

Big Ben Holdings

Modern Slavery Statement 2024



THE  Bloomfield GROUP

WE CARE. WE DELIVER.

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Our Approach

Our company Values: **WE CARE. WE DELIVER** underpin our commitment to the safety and wellbeing of our people, our local community and the environment. We believe that all people involved in our operations and supply chain should be free from modern slavery.

Our Modern Slavery Statement has been developed in accordance with our company Values and the Modern Slavery Act 2018 (Cth) 'the Act'. Our Modern Slavery Statement sets out the process and actions we have taken to assess and address risks of modern slavery practices in our operations and supply chains for the year ending 31 March 2024 (YEM24).



Key Areas of Action

- ✓ Additional risk mitigation strategies related to the engagement of overseas team members to work in our PWG King & Sons Pty Ltd (Kings Engineering) business continued. These include conducting and reporting on regular well-being checks with our new team members. The results indicate that they feel safe and supported and that no additional modern slavery risks have been identified.
- ✓ We added new enquiries to both the tendering and contractor mobilisation process to strengthen detection and evaluation of any potential rise in modern slavery risk.
- ✓ The procurement team and contract owners continued to conduct targeted performance reviews with relevant suppliers and maintained regular engagement with other suppliers.
- ✓ Policies and Systems related to human rights are continually reviewed and improved.
- ✓ The Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting the annual modern slavery risk review.



Our Structure, Operations and Supply Chains

Big Ben Holdings Pty Ltd (ABN 63 008 434 562) ('BBH') is the head company of a consolidated tax group of companies which, taken together or individually, are commonly referred to in the Hunter Valley as "The Bloomfield Group". The Bloomfield Group is a proud and successful Australian mining and engineering group. Australian owned and operated, we have been part of the community for more than 85 years and employ hundreds of local people.

Our success has been built on a simple desire to seek excellence in all we do, respecting our history as we shape our future. Our company values underpin our approach: **WE CARE. WE DELIVER.**

We respect and care about the safety and wellbeing of our people, our local community and the environment. We work together with integrity to deliver safety, operational best practice, customer satisfaction and compliance.

Our supply chain has remained largely unchanged during the year. A number of dormant group and associated companies including Genesis Coal Resources Pty Ltd were deregistered during the year.

We moved from 45% to 100% ownership of Biodiesel Industries Australia Pty Ltd, a Rutherford company which manufactures biodiesel for commercial sale. Additionally, BBH acquired Ashtonfields Pty Ltd which is a landholding company.

The risk review included consideration of these changes and found there to be no increased modern slavery risk.

This Modern Slavery Statement is made by BBH as a reporting entity in compliance with the Act and on behalf of its related bodies corporate as defined by the Corporations Act.

The following entities are included:

MINING

Northern Waggons Pty Ltd

Bloomfield Collieries Pty Ltd

Rix's Creek Pty Ltd

Goonbri Coal Company Pty Ltd

Curlewis Coal & Coke Pty Ltd

ENGINEERING & OTHER ENTITIES

Four Mile Pty Ltd

PWG King & Sons Pty Ltd

Four Mile Management Services Pty Ltd

McDougalls Hill Development Holdings Pty Ltd

Ashtonfields Pty Ltd

Biodiesel Industries Pty Ltd

("the Group Companies")

The Boards of each of the Group Companies comprise one or more of the Directors of BBH and consultation between the Group Companies required by the Act occurs at BBH's board meetings.

About us



The Group's main business is mining and engineering. Mining activities include the extraction of coal by open cut truck and excavator mining methods, beneficiation of thermal and semi-soft coal and loading the coal onto rail for transport to Port Waratah where the coal is loaded onto vessels for sea-borne transport to our Asian customers. Title to the coal passes to the customers when it is loaded onto the vessels.

Our engineering business provides general engineering solutions to Australian customers across a range of industries including mining, tunnelling and infrastructure, rail and manufacturing.

The Group engages approximately 750 suppliers who provide goods and services across a number of different areas including labour, plant and equipment, consumables, components, clothing and PPE.

Because we aim to develop relationships with local suppliers, our suppliers are predominantly Hunter Valley based companies. Most of the Group Companies have no direct external interfaces or supply chain themselves. In these cases, any contracts and purchases are executed by Four Mile Pty Ltd such that the supply chain for Four Mile Pty Ltd is effectively the supply chain for the Group Companies.

Our website bloomcoll.com.au provides further detail on our operations.

Our Key Policies

Our values **WE CARE. WE DELIVER.** are embedded in our key Policies and underpin our commitment to human rights.

Key Policies and Management Systems that relate to human rights include:

- ▶ Code of Business Conduct;
- ▶ Safety and Health Policy;
- ▶ People Policy;
- ▶ Risk Management Policy;
- ▶ Environment Policy; and
- ▶ Whistleblower Management System.

Risk Assessment and Mitigation

Our approach to modern slavery risk assessment and mitigation is supported by our belief that all people involved in our operations and supply chain should be free from modern slavery.

During the reporting period, the Group's cross functional Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review across our operations and supply chains. The Committee considered any changes that occurred throughout the Group's operations and supply chains and risk ranked our current controls against key risk indicators for modern slavery across four (4) risk areas: sector and industry risks, product and service risks, geographic risks and entity risks.

The risk assessment found that the probability of modern slavery within our Group's operations and supply chains is low. Our operations are based in NSW, Australia. According to the Global Slavery Index 2023, Australia has a relatively low rate of modern slavery (1.6 instances per 1000 people) compared to other countries worldwide.

The Global Slavery Index 2023 highlighted certain key imported products with a high risk of involving forced labour, including electronics and garments, which are relevant to our business. We focused on these areas during our risk assessment.

We had previously identified our clothing and personal protective equipment (PPE) suppliers as areas needing extra oversight. To address this, we have continued to collect Manufacturer Compliance Statements from these suppliers. This approach is consistent with the findings of the Global Slavery Index 2023, which lists garment supplies as one of the top five product categories at risk for modern slavery.

Electronics also appear in the top five at-risk categories according to the Global Slavery Index 2023. Consequently, our Risk Review Committee explored whether we need more stringent controls around our electronics supplies. Although our current risk in this area is deemed low, we plan to review our information technology contracts with suppliers to identify and reduce any potential risks of modern slavery.

The risk review process identified that we continue to have strong controls in place that mitigate a range of modern slavery risks. These controls include but are not limited to our Values, Policies and Management Systems and our adherence to relevant Australian legislation concerning safety, employment and industrial relations and the environment.



Steps that we have taken during the period to further mitigate modern slavery risks include:

- ✓ Additional risk mitigation strategies related to the engagement of overseas team members to work in our PWG King & Sons Pty Ltd (Kings Engineering) business continued. These include conducting and reporting on regular well-being checks with our new team members. The results indicate that they feel safe and supported and that there have been no additional modern slavery risks identified.
- ✓ To enhance measures to pinpoint any heightened risk of modern slavery concerning suppliers and the labour provided by contracting companies, we added new enquiries to both the tendering and contractor mobilisation process to detect and evaluate any potential rise in modern slavery risk.
- ✓ The procurement team and contract owners continued to conduct targeted performance reviews with relevant suppliers and maintained regular supplier engagement with other suppliers.
- ✓ Review and continuous improvement of Policies and Systems related to human rights.
- ✓ The Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review.

The effectiveness of current and future controls implemented has been and will continue to be assessed by the Group, on an ongoing and annual basis. This assessment is managed through the Modern Slavery Risk Review Committee which reports to the relevant Boards.

As part of the Group's commitment to reducing modern slavery risks in our operations and supply chain, consultation is undertaken with the relevant Board on an annual basis.



Looking Forward

Whilst the Group has again identified that the modern slavery risk across our operations and supply chains remains low, we recognise that efforts in relation to reducing modern slavery require us to continuously review and improve our practices.

Looking forward, the Modern Slavery Risk Review Committee recognised that there is an increased product risk in relation to the supply of electronic equipment. Although the risk review determined that the BBH risk remains low in this area, it was identified that a review would be conducted in relation to information technology contracts with suppliers to identify and minimise any potential modern slavery risks.

We will continue our ongoing welfare check program for our overseas team members to allow us to review, action and report on any issues affecting safety, wellbeing or modern slavery risks.

The Group will continue to review, assess and address modern slavery risks through our Modern Slavery Risk Review Committee.





Modern Slavery Statement Approval

As required by the Act, this statement has been reviewed by and approved by the Big Ben Holdings board as the principal governing body of the reporting entity and signed by its Chairperson.

John Richards
Chair

18 April 2024





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GROUP

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