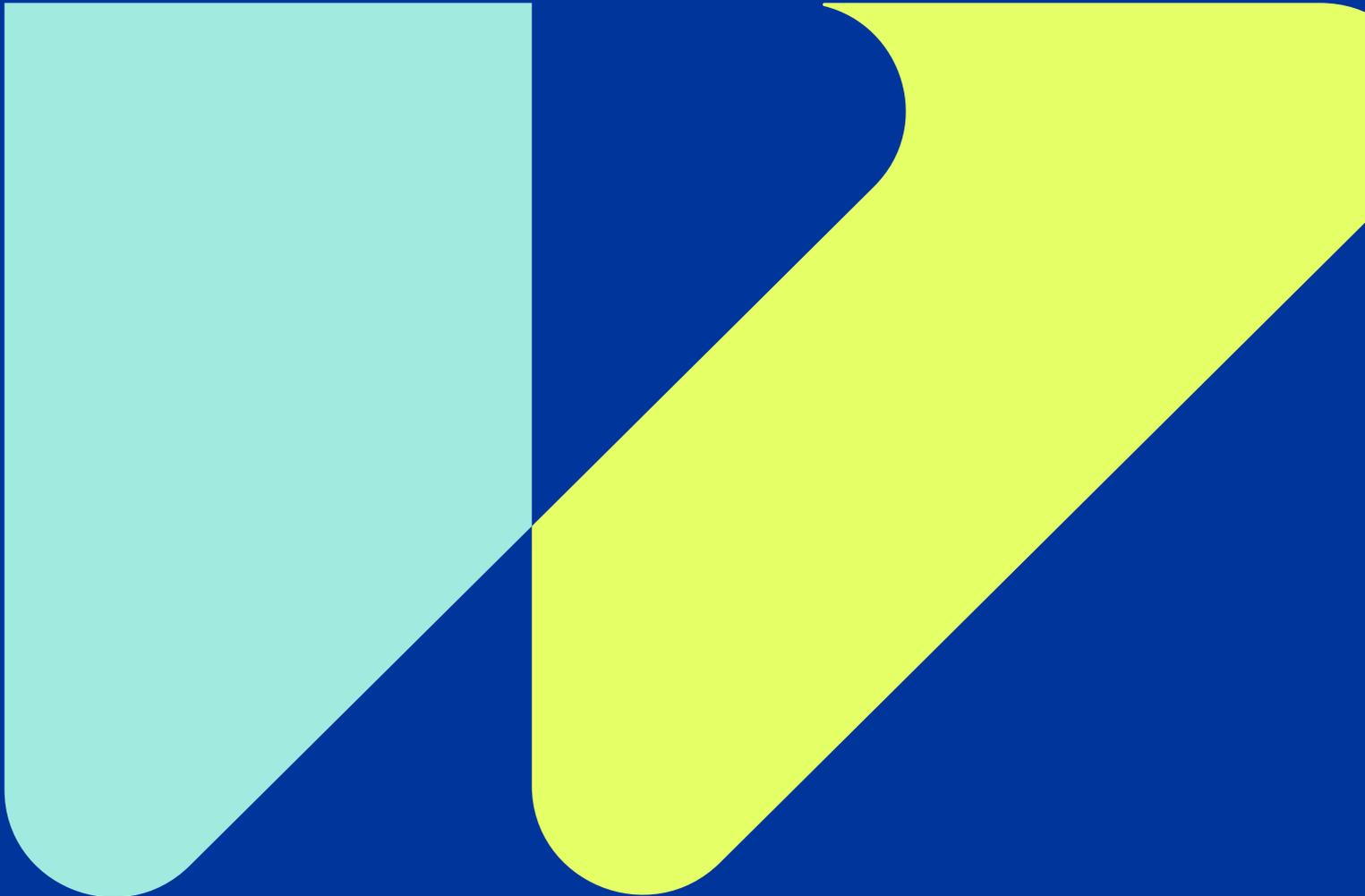


Modern Slavery Statement



Contents

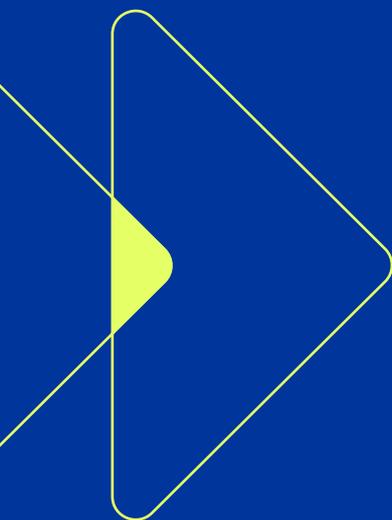
Reporting entities	1
Chairman's introduction	2
Our business	4
Our supply chains	6
Assessing and addressing modern slavery risks	8
Progress and FY26 action plan	12
Assessing effectiveness	12

Acknowledgement of Country and Traditional Owners

Whitehaven acknowledges Australia's Traditional Owners, recognising their ancient and enduring connection to land, waters and community.

We pay our respects to the Indigenous peoples of Australia, and to their Elders past and present.

We acknowledge the Gomeri people of North West New South Wales and the Gaangalu and Barada Barna Peoples of Central Queensland.



Reporting entities

This Joint Modern Slavery Statement 2025 (Statement) is made on behalf of Whitehaven Coal Limited and its controlled subsidiaries that are reporting entities under the Australian *Modern Slavery Act 2018* (Modern Slavery Act) for the financial year ended 30 June 2025 (FY25).

Reporting entities	ABN
Whitehaven Coal Limited	68 124 425 396
Whitehaven Coal Holdings Pty Ltd	84 124 452 571
Whitehaven Coal Mining Limited	65 086 426 253
Narrabri Coal Pty Ltd	76 107 813 963
Aston Resources Limited	91 129 361 208
Aston Coal 2 Pty Ltd	14 139 472 567
Vickery Coal Pty Ltd	74 626 224 495
Whitehaven Blackwater Pty Ltd	66 672 142 997
Whitehaven Daunia Pty Ltd	28 672 143 583
Whitehaven MetCoal Holdings Pty Ltd	76 666 288 384

Registered office

The registered office of all reporting entities covered by this Statement and their controlled entities is:

Level 28
259 George Street
Sydney NSW 2000

In this Statement, unless expressly mentioned otherwise, references to Whitehaven, the Group, the Company, 'we', and 'our', refer to Whitehaven Coal Limited, its subsidiaries and its controlled entities, and Whitehaven Coal Limited operated joint operations as a whole as outlined on pages 101 and 102 of our Annual Report 2025.

This Statement is Whitehaven's sixth under the Modern Slavery Act.

Modern Slavery Act mandatory reporting criteria

This statement was prepared to meet the mandatory criteria in section 16 of the Modern Slavery Act. The table below identifies where each criterion of the Act is addressed within this Statement.

Consultation with reporting entities

Whitehaven takes a Group-wide approach to how we assess and manage modern slavery risk across all of our controlled entities—this includes our policies, systems and due diligence framework.

Mandatory criteria	Page number/s
1. Identify the reporting entity	1
2. Describe the structure, operations and supply chains of the reporting entity	4-7
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	8-11
4. Describe the actions taken by the reporting entity and any entities it owns or controls, to assess and address those risks, including due diligence and remediation processes	12
5. Describe how the reporting entity assesses the effectiveness of such actions	12
6. Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultations with the entity giving the statement)	1
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant	11

The Modern Slavery Act defines modern slavery as including eight types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruitment for labour or services, and
- the worst forms of child labour: situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Chairman's introduction

Whitehaven is a proudly Australian company. Our purpose is to support and sustain regional communities by exporting metallurgical and high-quality thermal coal from Australia to the world. We strive to leave a lasting and positive legacy, and respecting human rights is a fundamental part of fulfilling this goal.

We acknowledge our role in supporting socially responsible operational and supply chain practices and are committed to taking action to prevent and mitigate the risk of modern slavery in our supply chains.

With an estimated 50 million individuals affected by modern slavery worldwide—including 27.6 million subjected to forced labour¹—we understand the importance of vigilance in our supply chain oversight.

This Statement is our sixth under the Modern Slavery Act, and we continue to build on the actions reported on in our previous statements. Our focus remains on strengthening our practices to minimise exposure to modern slavery risks in our supply chain, including by working collaboratively with our suppliers.

In FY25, we conducted an inherent risk assessment on the supply chain that supplies goods and services to our Queensland mines, Blackwater and Daunia. This is consistent with the approach used for the risk assessment of our New South Wales operations in FY22.



We continue to improve our approach to identifying and managing the risks of modern slavery. Our efforts are informed by ongoing engagement with our suppliers and other stakeholders, and are guided by evolving expectations.

This Statement was approved by Whitehaven Coal Limited's Board of Directors as the parent entity on 3 December 2025 in their capacity as principal governing body of the Group, and was signed by the Hon. Mark Vaile in his role as Chairman.



Pleasingly, there were no suppliers in our Queensland supply chain that were rated as a high risk of Modern Slavery practices.

During the year we also published our Supplier Code of Conduct, which can be found on the Whitehaven website, reinforcing our expectations for ethical conduct across our supply base.

We continue to improve our approach to identifying and managing the risks of modern slavery. Our efforts are informed by ongoing engagement with our suppliers and other stakeholders, and are guided by evolving expectations.

This Statement outlines further opportunities to refresh and strengthen our approach, as outlined in our FY26 action plan on page 12.

We welcome feedback on our Statement—feedback can be sent to sustainability@whitehavencoal.com.au

A handwritten signature in black ink, appearing to read 'Mark Vaile'.

The Hon. Mark Vaile, AO
Chairman

1. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, by International Labour Organization, Walk Free, and International Organization for Migration 2022.



Our business

Whitehaven is a leading producer of Australian metallurgical coal and high-quality, high-calorific value (CV) thermal coal. Our metallurgical (steelmaking) and thermal coal products are exported predominantly to Asia.

Whitehaven's high-quality steelmaking coal from Queensland supports mature and developing Asian economies, including meeting steel demand to build renewable energy and critical infrastructure.

Whitehaven produces amongst the highest quality seaborne thermal coal. Our thermal coal from New South Wales allows superior performance in Ultrasupercritical (USC) power plants in Asia, delivering lower emissions per unit of sent-out power produced than other coals.

Whitehaven Coal Limited is incorporated in Australia and its shares are publicly traded on the Australian Securities Exchange. All reporting entities under the Modern Slavery Act within the Group are also incorporated in Australia.

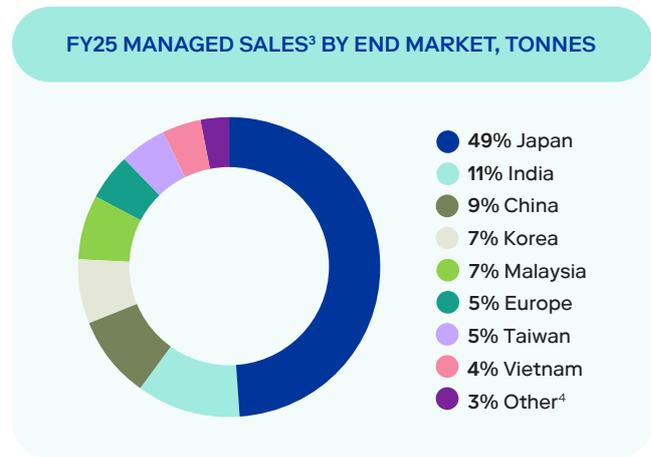
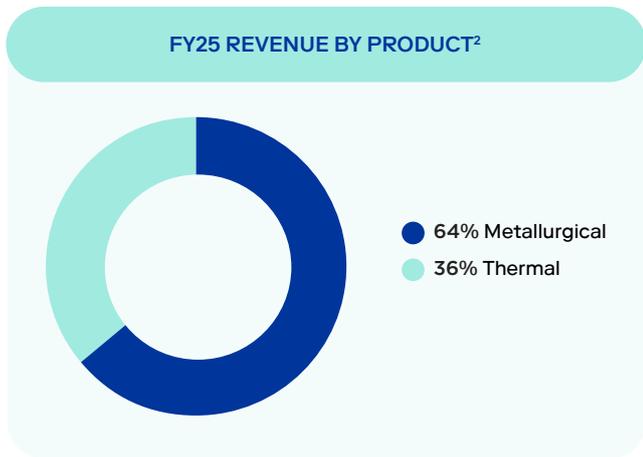
In FY25, Whitehaven reported revenue of \$5.8 billion¹ and run-of-mine (ROM) managed coal production of 39.1 million tonnes.

Our purpose is to support and sustain regional communities by exporting metallurgical and high-quality thermal coal from Australia to the world.

Our strategy is to own and sustainably operate large, cost-efficient mines producing high-quality coal to meet the needs of our customers and support economic development.

On a revenue basis, our portfolio is weighted towards metallurgical coal for steelmaking

We supply established and emerging countries in Asia, that are exposed to longer-term structural supply shortfalls



1. The Group total includes \$125 million of unallocated revenue.
2. On an equity basis excluding unallocated revenue (i.e. excluding third-party purchases).
3. Managed sales including third-party purchases.
4. Other coal sales destinations include Indonesia, Brazil, Thailand, Argentina and Australia.

Our operations

Our operations are located in the Gunnedah Basin in North West New South Wales, and the Bowen Basin in Central Queensland. In FY25, we operated four coal mines (including one underground mine) and the Gunnedah Coal Handling Preparation Plant (CHPP) in New South Wales, and two coal mines in Queensland.

Our long-held strategic goal to grow in metallurgical coal advanced in FY25 following the successful integration of Blackwater and Daunia mines into Whitehaven's portfolio and solid results delivered in the first full year of ownership. Our high-quality thermal coal business in New South Wales also delivered solid financial and non-financial results.

From an equity ownership perspective, we have:

- 75% equity interest in the Maules Creek open cut mine, 77.5% equity interest in the Narrabri underground mine, and 100% interest in the Gunnedah Open Cut mines in New South Wales.
- In Queensland, 100% interest in Daunia open cut mine and 70% interest in Blackwater open cut mine.

The Gunnedah Open Cut mines include Vickery and Tarrawonga.

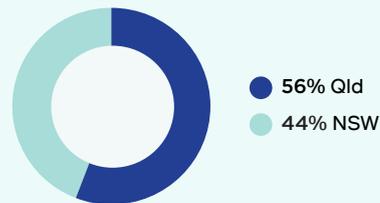
Our operating assets are complemented by two high quality, development projects, the Vickery Extension Project near Gunnedah in New South Wales, and the Winchester South Project in Queensland's Bowen Basin.

Beyond our coal operations in New South Wales and Queensland, we also have offices in Newcastle, Sydney, Gunnedah, Brisbane, Tokyo, Japan, and representation in India.

Our workforce²

We have a workforce of 6,444 mostly working in regional Queensland and New South Wales

FY25 employees and contractors



3,349

employees

3,095

total contractors

10.4%

of employees identify as Indigenous

24.1%

Women in leadership roles³



1. Early mining of Vickery commenced in late FY24. Full-scale mining of Vickery is a fully approved development project.
2. Whitehaven's Sustainability Report 2025 notes a total workforce of 6,444 which includes total employees of 3,349 and total contractors of 3,095. Contractors include 1,185 embedded contractors hired via labour hire firms or individual contracts.
3. Leadership roles are defined as anyone with direct reports or those reporting to an Executive General Manager or General Manager.

Our supply chains

In FY25, we engaged 2,398 suppliers and spent \$4.8 billion in contestable spend¹ at our New South Wales and Queensland operations, with the majority of our spend with Australian-based companies.

\$4.8 billion

Contestable spend

98%

Australian-based suppliers

96%

Spend with
Australian-based suppliers

39

International-based suppliers

14

International countries
sourced from

Spend categories

Our largest contestable spend categories are:

Rail, port, sales and marketing

Includes rail transport to the Port of Newcastle, coal export terminal costs, port-related costs, and the payment of selling commissions and agents fees. We use five export terminal providers; Newcastle Coal Infrastructure Group (NCIG) and Port Waratah Coal Services (PWCS) in New South Wales, and Hay Point, Dalrymple Bay and Gladstone ports in Queensland, to store and load coal onto ships for export to our customers.

Coal

We purchase Australian-produced coal from third parties, largely to optimise the blend of our own coal or due to production shortfalls.

Mining services

Includes engineering, operations and professional services.

Energy and utilities

Comprises fuels such as diesel for use in our mining fleet and operations, and electricity from utilities and electricity retailers.

Mining equipment

Comprises heavy mine haulage trucks, earth moving equipment and heavy mining equipment, parts, components, and equipment hire.

Labour hire

Comprises the recruitment of skilled workers hired in our operations.

Drilling and blasting

Includes drilling and blasting services, explosive materials and related consumables.

Procurement management

Whitehaven's procurement is managed Group-wide by our Procurement team, led by the General Manager Procurement.

We procure goods and services from suppliers through various types of arrangements, which range from short and long-term procurement agreements managed by our centralised Procurement function, to purchase order terms and conditions for low-value purchases that are managed by our operations.

We support Australian small businesses by offering 21-day payment terms to our small and medium-sized local suppliers in the areas around our operations, and report in compliance with the Payment Times Reporting Scheme.

International suppliers

In FY25, we sourced goods and services from 39 international-based suppliers located in 14 countries. The majority of this spend, which accounted for 4% of our contestable spend, related to purchases of coal produced in Australia, selling commissions, port charges and financing activities.

1. Contestable spend includes capital and operating expenditure on 100% operating control basis. It excludes payments to government, taxes, and employee payments and expenses, and demurrage charges. Spend data is for New South Wales and Queensland operations.

Non-Australian sourcing countries	Spend categories
Austria	Technology
Belgium	Technology
Canada	Technology
China	Finance, agents fees/commissions, mining equipment/components, technology
Germany	Port charges, coal purchases
Hong Kong	Agents fees
Japan	Agents fees
Netherlands	Technology
Republic of Ireland	Technology
Singapore	Technology, port charges, coal purchases
South Africa	Subscriptions
Switzerland	Port charges, subscriptions
United Kingdom	Subscriptions, technology
United States	Subscriptions, technology, agents fees/commissions



Assessing and addressing modern slavery risks

We assess the risk of modern slavery practices based on the potential for Whitehaven to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains, as set out in the UN Guiding Principles on Business and Human Rights.

Modern slavery practices that are most likely to occur in supply chains are debt bondage, serious child labour and forced labour.

We are committed to upholding internationally recognised human rights and complying with all applicable local human rights laws. This includes complying with the UN International Labour Organization (ILO) Conventions on minimum age of work and the prohibition of the worst forms of child labour, including hazardous child labour.

We respect human rights, including people's right to freedom from all forms of modern slavery and recognise our responsibility to mitigate and prevent modern slavery practices in our supply chains and operations.

Risk in operations

We assess the risk of modern slavery practices relating to our workforce as low due to strong human resources controls in place. All of our operations are located in Australia, where there are strong workplace rights and legal protections relating to labour management.

Whitehaven's approach to human resources management is underpinned by robust policies and procedures, training and grievance mechanisms.

Our recruitment and onboarding processes include appropriate checks relating to working rights and age requirements. In FY25, 63% of our employees were also covered by enterprise agreements.

Contractors

We engage skilled contractors to support our operational requirements, perform specialist and generalist trades, and provide professional and administrative services. Some contractors are engaged via our labour hire providers with which we have established contractual arrangements.

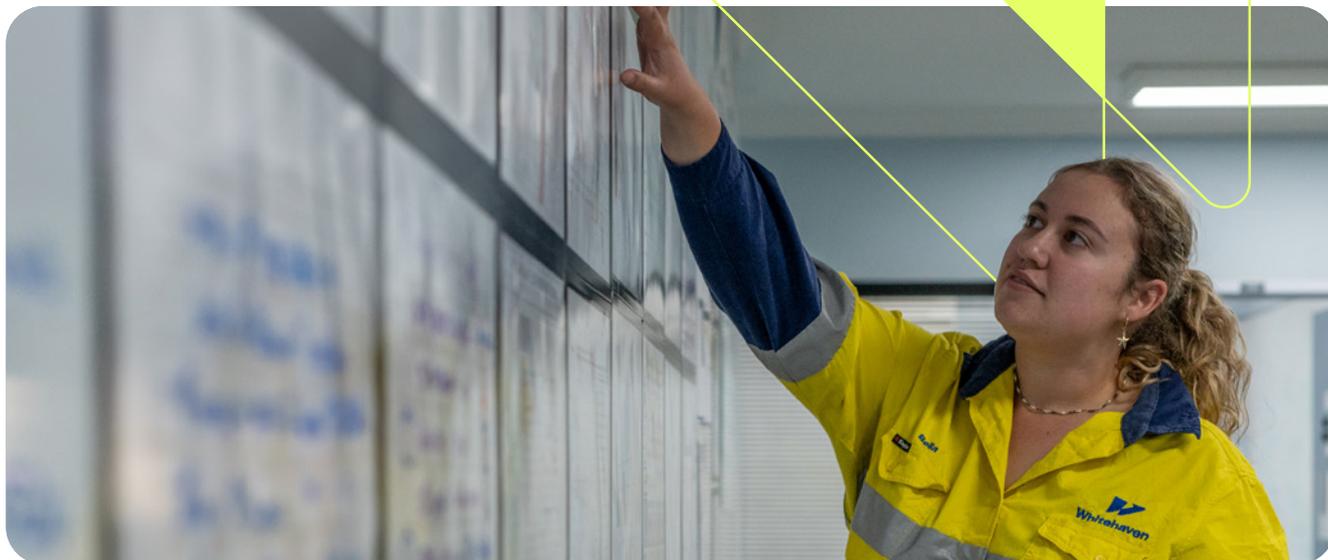
Shipping

Maritime shipping has been recognised as susceptible to modern slavery, with seafarers working in an environment with a high-risk of labour exploitation.¹

Whitehaven does not procure any shipping arrangements or have any direct contractual relationship with the shipping operators, as our customers procure shipping services for the coal that they purchase from Whitehaven.

In FY23, we reviewed the most recent Modern Slavery Statements published by NCIG, PWCS and the Port of Newcastle.

We remain committed to working with New South Wales and Queensland port facilities to ensure the right governance framework is in place to monitor and report on modern slavery risk.



1. Modern Slavery within Maritime Shipping Supply Chains, by the UN Global Compact Network Australia and Maritime Union of Australia, December 2022.

Risks in supply chains

In FY22, we engaged Unchained Solutions Pty Ltd (Unchained) to conduct an inherent modern slavery risk assessment and mapping exercise of our Tier 1 suppliers.

The risk of modern slavery was analysed based on:

- Country risk—where the suppliers' activities are based and the risks that represent the country of operation.
- Category—the type of goods or services supplied by the suppliers and the known risks associated with the product or service.

Country risk was assessed based on the Walk Free Global Slavery Index 2018, which aims to assess countries' prevalence of modern slavery, vulnerability to modern slavery, and government responses to modern slavery.

Category risk was assessed based on the Global Slavery Index 2018, the International Labour Organization's dataset, and information from the United States Department of Labor on goods produced by child labour and forced labour. Higher risk categories are typically characterised by a high number of vulnerable workers, largely migrant and low-skilled workers who are employed in low-paying and often higher risk work.

We consider country risk as the key determinant of our risk of contributing to or being directly linked to modern slavery practices.

Supplier assessment and contract terms

When selecting new suppliers, we assess a range of matters including how the business manages modern slavery in their business and supply chains, the location of the supplier and what country the goods and services provided are sourced from.

Our standard contract terms include a general obligation for suppliers and contractors to comply with all laws, site rules and policies, as well as meet modern slavery laws and provide Whitehaven the right to conduct an audit of, or perform due diligence in respect of, modern slavery risk.

FY25 risk assessment

During FY25 we engaged Unchained to undertake an inherent modern slavery risk assessment and mapping exercise on our Tier 1 suppliers to our Queensland operations. This risk assessment used the same methodology as was applied to our New South Wales suppliers during FY22.

The review focused on our top 250 Queensland suppliers by spend value, which accounted for 72% of spend to our Queensland operations.

This risk assessment did not identify any high-risk suppliers in our Queensland supply chain.



Assessing and addressing modern slavery risks

Governance

Our modern slavery risk assessment and mitigation process is led by our Procurement and Sustainability teams, with oversight from the Audit and Risk Management Committee of the Board.

Unchained supports Whitehaven with our modern slavery risk assessment and due diligence processes. Unchained is a modern slavery consulting firm that provides business solutions around strategy, training, analysis, documents and research to assist Australian organisations comply with the Modern Slavery Act.

Policies

Our suite of policies, which are supported by processes and grievance mechanisms, relating to mitigating and remediating the risk of modern slavery include:

Code of Conduct	Defines the standards of behaviour expected by all our employees and people working for, or on behalf of, Whitehaven—this includes our contractors, consultants and directors. The Code's principles include to act with honesty, integrity and fairness; treat others with respect and dignity; and maintain a safe working environment.
Speak Up Policy	Encourages anyone with information about potential misconduct to report that information.
Anti-Corruption Policy	Establishes a standard of behaviour of integrity, honesty and transparency which applies to the Company and its directors, officers, employees, agents, and any other party representing the Company.
Diversity and Inclusion Policy	Outlines our commitment to support and encourage a diverse workforce and inclusive workplace which is free from unacceptable behaviour, and our approach to diversity and inclusion. Whitehaven also captures, monitors and reviews employee complaints related to breaches of this policy.
Workplace Behaviour Guidelines	Outlines what constitutes discrimination, vilification, sexual harassment, workplace harassment, bullying and victimisation (together known as unacceptable behaviour) and the process of raising any concerns about unacceptable behaviour. Whitehaven's Workplace Behaviours Complaints Procedure contains the process to manage and resolve workplace bullying, harassment and/or discrimination complaints within Whitehaven.
Supplier Code of Conduct	Defines the minimum requirements for Whitehaven's suppliers of goods and services. This includes workplace health and safety, environmental protection, labour and human rights, integrity and anti-corruption, and modern slavery.

We expect all our suppliers and contractors to share our commitment to ethical conduct and integrity. All contracted and on-site suppliers are required to comply with our Code of Conduct, policies and procedures.



Grievances and remediation

Our Speak Up Policy encourages anyone to speak up with information about potential misconduct and to report that information. Potential misconduct includes any improper state of affairs or circumstances in relation to the Company and therefore includes potential modern slavery practices.

The policy applies to our employees and contractors; suppliers of goods and services and their employees; any associates of the Company; and a relative or dependent, or spouse of a dependent, of any of the above.

The policy outlines how to report concerns relating to business conduct, the processes we follow to respond to reports, and the protections a reporter receives.

Concerns of potential misconduct can be raised either via our external independent hotline service or Whitehaven's Executive General Manager – People & Culture, General Counsel and Company Secretary or Chief Financial Officer. Our independent whistleblower hotline, operated by Navex Global, provides individuals the opportunity to anonymously report potential misconduct.

All reports made are received and treated sensitively and seriously, and are dealt with promptly, fairly and objectively.

Where a concern of modern slavery relating to a direct or indirect supplier is raised, this is reported to Whitehaven's General Manager Procurement and Legal team to initiate further investigation.

In FY25, we did not receive any concerns related to modern slavery practices in our operations or direct suppliers.

Training and awareness

During FY22, Whitehaven's Procurement team, Commercial Managers and key purchasing staff completed Unchained's e-learning module to deepen their understanding of the issue of modern slavery and the requirements of the Act. Key personnel from Procurement, Commercial and Site management also took part in a skills training workshop to discuss the impact of modern slavery on the mining sector and good practice in engaging with vendors.

During FY24, modern slavery refresher training was provided to Procurement staff and Commercial Managers.



Progress and FY26 action plan

We continue to focus on improving our approach to assessing and managing modern slavery risks. Our FY25 progress and our FY26 planned actions are outlined below.

FY25 progress	Status
Conduct an inherent risk assessment on new suppliers following the acquisition of mining sites in Queensland	Complete
Conduct due diligence on high-risk suppliers identified through this assessment	No high-risk suppliers identified
Publish the Supplier Code of Conduct	Complete

FY26 action plan

Obtain and review Modern Slavery Statements for Queensland suppliers that were identified as medium risk during the FY25 review.

Select 20 Queensland suppliers to send a targeted questionnaire to better understand modern slavery risks in their organisation.

Assessing effectiveness

In FY25, we continued to assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking performance and outcomes against our action plan, and through our learnings from engaging with suppliers and other stakeholders. In particular, we reviewed:

- Risk identification—the results of our supplier risk assessment for our Queensland supply chain, to identify any suppliers with high inherent risk of modern slavery practices.
- Awareness and training—the proportion of our Procurement team and operational staff involved in procurement processes that have completed modern slavery training program, and the need for refresher training.
- Applying learnings—how we have applied learnings to further improve our approach and obtain a better understanding of our supply chains.

In FY26, we intend to continue our review on the suppliers that provide goods and services to our Queensland mines.





Nussy

Whitehaven

King Gee

MaxiCut
Grip
Safety
Gloves

MaxiCut
Grip
Safety
Gloves

Whitehaven Coal

Level 28, 259 George Street

Sydney NSW 2000

P +61 2 8222 1100

ASX Code: WHC

whitehavencoal.com.au