

Reporting Entity

This statement is prepared on behalf of Batchfire Resources (ABN 84 607 340 189), together with the entities it owns or controls (together, '**Batchfire**') in response to the reporting requirements of Section 14 of the Modern Slavery Act 2018 (Cth).

This Statement outlines the actions taken by Batchfire to identify, assess and mitigate modern slavery risks in our operations and supply chains, over the financial year ending 31 December 2024.

Structure & Operations

At Batchfire, we recognise that respecting the human rights of those affected by our business activities matter to us and how we behave.

Batchfire Resources is a modern, privately owned transitional energy business producing energy coal from the Callide Mine, located in the Callide Basin in Queensland, Australia. Batchfire's Callide mining tenure covers 16,000 hectares and contains an estimated coal resource of up to 1.07 billion tonnes. The open-cut Callide Mine has been in operation since 1944, producing low sulphur coal. Batchfire's technology-driven approach delivers around 11 million tonnes of coal annually for domestic power generation, alumina refining and export to Asia. Batchfire Resources Pty Ltd is the holding entity for Batchfire Callide Pty Ltd and Batchfire Callide No.2 Pty Ltd which holds the mining tenure in the Callide Basin.

Batchfire is the Callide Valley's largest employer, with around 600 full time employees and 1250 local families supported directly and indirectly by our ongoing operations. Around 85 per cent of our direct employees live within the valley itself and our workforce is sourced from the local community.

Our Supply Chain

Batchfire works with many suppliers that source mining equipment and goods from several countries. Batchfire contracts directly with Australian based contractors and service entities and sources from the Australian market where possible. As a result, the majority of Batchfire's contractor and service providers are covered by Australian industrial relations legislation.

The main type of goods and services that Batchfire procures includes mobile mining equipment and associated parts, fuel and explosives, general industrial, logistics and freight, energy and utilities, general supplies, professional services and information technology. The supply chain also includes the services provided by contractors and consultants and their respective supply chains.

Batchfire generally seeks to engage suppliers on long term, stable contracts, but depending on business needs, it can also have short-term purchasing arrangements in place.

Modern Slavery Risks

Batchfire recognises that modern slavery may impact its business activities and it endeavours to take responsibility for reducing the risk that it might inadvertently contribute to modern slavery through the operations and supply chains. The mining industry in Australia is generally considered a low risk because its industrial environment is highly regulated and monitored by independent parties.

Batchfire has developed a risk assessment methodology to assess any modern slavery residual risks utilising the following recommended resources provided in the Federal Government's Modern Slavery guidelines:

- The 2017 Hidden In Plain Sight report by the Parliament of Australia which provides a list of both domestic and imported goods having a high risk of modern slavery.

- Global Slavery Index 2018, which reports the highest risk areas for Modern Slavery for goods imported to Australia.

The initial risk assessment indicated that Batchfire's operations and supply chain have a low potential for modern slavery risks. Key aspects of the risk profile are summarised in the table below.

Risk Profile & Mitigation

Risk Category	Description Of Risk Due Diligence and Remediation
Labour Hire	Batchfire utilises labour hire companies, which have the potential to conceal risks and reduce employment certainty. All labour hire workers engaged by Batchfire are engaged under enterprise agreements, approved by the Fair Work Commission, and as a result, there is low risk in terms of the employment arrangements. Further, in recognition of our commitment to conduct operations in an ethical and responsible manner, Batchfire did not contest the 'same job, same pay' application for our labour hire employees, with the order taking effect from 1 November 2024. This legislation, introduced in Australia through the Fair Work Legislation Amendment (Closing Loopholes) Act 2023, was designed to ensure labour hire workers receive the same pay and conditions as direct employees performing the same role. While it focuses on fair pay, this legislation also helps to eliminate situations where workers are exploited and as unfair working conditions can be a pathway into modern slavery.
Laptops, Computers, and Mobile Phones	While this is a high-risk category, the spend is less than half a percent of total annual spend. We have a low number of suppliers in this category but acknowledge they may have long supply chains in multiple countries where modern slavery risks may be higher. Risk mitigation is via increasing visibility into actions taken by these suppliers as they report in accordance with the requirements of the Modern Slavery Act.
Apparel and Clothing Accessories	While this is a high-risk category, the spend is less than half a percent of total annual spend and one supplier is responsible for most of the spend. Risk mitigation is via direct contact with this supplier for evidence lines of goods supplied to Batchfire are supplied in accordance with the requirements of the Modern Slavery Act.
Industrial Cleaning	Batchfire contracts to cleaning contractors to supply this high-risk service. Workers engaged by the contracting company are engaged under enterprise agreements, approved by the Fair Work Commission, and as a result, there is low risk in terms of the employment arrangements.
Natural Rubber	This high-risk category is a raw material for tyre and conveyor belt manufacture and spend in these categories is approximately 5% of total annual operating spend. Each of these spends is via one reputable supplier. Risk mitigation is via direct contact with these two suppliers for evidence that goods supplied to Batchfire are supplied in accordance with the requirements of the Modern Slavery Act.
General / Other	Batchfire maintains long term relationships with trusted suppliers. These relationships increase transparency and reduce the modern slavery risk in our supply chain. Batchfire is committed to continuing to invest in these types of lasting relationships. Batchfire is implementing a process of screening all new suppliers, and re-screening existing suppliers for modern slavery risks when it is identified that circumstances may have changed.

Policies & Procedures

Batchfire has several policies and procedures in place to provide a strong governance foundation upon which to base a framework for addressing modern slavery risks. These policies and procedures include:

- **Procurement Policy:** This Policy drives how we procure goods and services and the processes put in place to govern procurement activities. In addition, all procurement, contracting and supply chain management activities at Batchfire are conducted through a centralised Supply & Contracts Team on site.
- **ESG Policy:** We understand the importance of operating sustainably and conduct our operations in ethical, legal and responsible ways which demonstrate respect and care for our employees, the community and the environment.
- **Whistleblower Policy:** Batchfire encourages the reporting of instances of suspected unethical, illegal, fraudulent, or undesirable conduct via providing protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, recrimination, or disadvantage. This is backed by the Coal Mining Safety & Health Act 1999 which specifically addresses a person's protection from reprisal rights if safety or ethical concerns are raised.
- **Fair Treatment Policy:** Batchfire fosters a culture where employees and other workers feel safe and are encouraged to report workplace concerns, complaints, and grievances without fear of victimisation or recrimination.
- **Equal Employment Opportunity (EEO) and Anti-Discrimination Policy:** Batchfire recognise that a diverse workforce is vital to the long-term success of the Company. The EEO Policy empowers employees to report inappropriate conduct while prohibiting any retaliatory discrimination, harassment, bullying, vilification or victimisation of the reporter.
- **Employee Assistance Program (EAP)** which offers support and counselling to anyone who may experience stress or anxiety from reporting any suspected wrongdoing.

Actions Taken to Address Risks

Building upon actions taken in prior years, Batchfire has continued to strengthen its governance and risk mitigation controls by further embedding due diligence practices into our supplier onboarding and procurement processes and throughout the lifecycle of the supplier relationship, such as introducing site visits to supplier premises.

We also continue to educate personnel about modern slavery risks and the importance of ethical sourcing and transparency within our supply chain, particularly in the identified high risk categories.

Assessing Our Effectiveness

Batchfire has laid a solid foundation for the management of modern slavery risks in its supply chains and to date, has not had any known breaches of modern slavery requirements.

We are committed to reviewing the effectiveness of our actions by regularly reviewing our modern slavery processes. In the next reporting period, Batchfire will undertake a review of its standard terms and conditions for both long-form contracts and purchase orders to ensure each includes requirements in respect to modern slavery compliance obligations.

Modern Slavery Statement

Reporting Period: 1 January 2024 to 31 December 2024

Consultation

Prior to being put to Batchfire's Board of Directors for review and endorsement, Batchfire actively engaged and consulted with members of the Finance Team, Supply & Contracts Department and Executive Leadership Team regarding the development of this Statement.

Endorsement

This statement was approved by Batchfire's Board of Directors on 23/9/2025



Allan Fidock

Chief Executive Officer