



Peabody Investments Corp. *2024 Modern Slavery Statement*

Introduction

Modern slavery is a term used to cover a range of exploitative practices, including human trafficking, slavery, slavery-like practices, forced labour, child labour and the removal of organs.

Under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**), certain Peabody entities owned by Peabody Investments Corp. (**PIC, our or we**) are recognised as reporting entities and are required to prepare modern slavery statements.

This document is Peabody's fifth joint Modern Slavery Statement for its Australian operations and covers the reporting period of 1 January 2024 to 31 December 2024 (**FY24**).

This Modern Slavery Statement describes our structure, the risks of modern slavery in our operations and our supply chain, and the actions we have taken to address those risks during the FY24 reporting period based on steps from our previous Modern Slavery Statement for the FY23 period. This document also provides our assessment of these actions taken and their effectiveness, governance and risk management processes and sets out future identified actions planned for the FY25 reporting period.

Peabody's Operations

Peabody is a leading coal producer, providing essential products to fuel baseload electricity for emerging and developed countries and to create the steel needed to build foundational infrastructure.

Our commitment to sustainability underpins our activities today and helps to shape our strategy for the future.

Peabody has 17 active coal mining operations across Australia and the USA. In Australia, Peabody operates the following mines:

New South Wales

- Wilpinjong Mine
- Wambo Underground Mine
- Metropolitan Mine

Queensland

- Coppabella Mine (part of the Coppabella Moorvale Joint Venture)
- Moorvale Mine (part of the Coppabella Moorvale Joint Venture)
- Moorvale South Mine (part of the Coppabella Moorvale Joint Venture)
- Burton Mine (rehabilitation)
- Centurion Mine



Our Position on Modern Slavery

Integrity is one of Peabody's key values. It drives how we procure goods and services and the processes put in place to govern procurement activities. We strive to undertake our business dealings with suppliers fairly and want to ensure that the employees of our suppliers are dealt with appropriately and in accordance with applicable labour laws. We also want to ensure our suppliers are aware of modern slavery risks and are taking reasonable actions to detect such practices in their own supply chains.

Peabody has demonstrated its support for the principles of the United Nations Global Compact which, in part, supports labour practices that reject modern slavery in all its forms. This has been done through the Peabody Anti-Slavery Policy (available to view at www.peabodyenergy.com). We are committed to continuously improving transparency within our business and operations.

We do not tolerate any instance of modern slavery. Where the risk of modern slavery practices is identified in our supply chains, we will investigate and take corrective actions, including changing sources of supply as necessary. This is further outlined in this document below.

Our Organisational Structure

Peabody Energy Corporation (**Peabody**) is a listed company on the New York Stock Exchange. The majority of Peabody's mining operations in Australia are held by Peabody Australia Holdco Pty Ltd (ACN 154 820 130) (**PAH**).

This joint modern slavery statement is made by PIC on behalf of PAH and all of the entities listed in the tables below, which are reporting entities under the Modern Slavery Act.

PIC has 225 employees and is a holding company of PAH which is, in turn, the holding company of the following entities:

Name of reporting entity	Australian Company Number	Number of employees
Peabody Energy Australia Pty Ltd	096 909 410	-
Wambo Coal Pty Ltd	000 668 057	21
Metropolitan Collieries Pty Ltd	003 135 635	-
Peabody COALSLES Pacific Pty Ltd	146 797 408	13
Peabody Australia Mining Pty Ltd	002 818 699	-
Peabody Energy Australia PCI Pty Ltd	096 001 955	-
Peabody Coppabella Pty Ltd	095 976 042	-

PIC is the holding company of the following entity:

Name of reporting entity	Australian Company Number	Number of employees
Wilpinjong Coal Pty Ltd	104 594 694	456



The Board of Directors of PIC, as the principal governing body for the reporting entities listed above, have approved this Modern Slavery Statement through a board resolution dated 15 May 2025.

PIC does not own or control any other Australian entities considered a reporting entity under the Modern Slavery Act.

Supply chains

The supply chains of the reporting entities on whose behalf this statement is made vary across a broad range of goods and services categories. These include goods categories such as major capital equipment (e.g. trucks, excavators, drill rigs, conveyors), fuel, tyres, explosives, chemicals and structural support equipment as well as services categories such as maintenance, engineering, technical consulting, contract labour, project mining services and utilities.

Procurement, contracting and supply chain management activities at Peabody in Australia are conducted through a centralised Supply Chain Management team based in our Brisbane Head Office. This team works closely with the operating entities and sites to ensure that ethical sourcing of goods and services to our operations is conducted in a well-governed and reliable manner and in accordance with Peabody's Anti-Slavery Policy. This centralised supply chain function is accountable for Peabody's governance, risk assessment and treatment activities in relation to modern slavery risks outlined in this Statement.

The nature of Peabody's numerous individual supply chains varies depending on the nature of the products or services procured. These range from highly sophisticated, mature and integrated global supply chains with our major equipment suppliers, to uncomplicated local supply arrangements with small to medium businesses within the communities proximate to our Australian operations.

As the relevant reporting entities covered by this statement have an operational footprint limited to Australia, Peabody's engagement of services is predominantly from within Australia, with some exceptions such as tyres and some chemicals which are sourced at a global level by Peabody's Global Head Office based in St Louis, Missouri, USA.

Modern Slavery Risk Management

Key Risks

Peabody has identified the key risks of modern slavery in our operations, including the operations of all entities on whose behalf this statement is made, as follows:

Counterparty Risks – Through sales, marketing and business development activities, Peabody engages with counterparties both domestic and international. Some of these counterparties operate in parts of the world where modern slavery risks are more prevalent and also in industries where cases of modern slavery have been previously documented.

Labour Risks – Through our engagement of labour, particularly contractor and temporary labour, there is the risk that workers are exposed to modern slavery practices through non-compliance with labour laws. The area of our business considered to be most exposed to these risks is our employment of support workers such as cleaners, caterers and clerical staff engaged on casual terms.



Procurement Supply Chain Risks – Through the engagement of local suppliers that source products overseas or direct sourcing activities from suppliers based overseas in the Asia Pacific emerging markets, there is the risk that the workers producing such products are exposed to modern slavery practices. Procurement of textile products (such as through the purchase of work uniforms) and rubber-based products (such as earthmoving tyres and conveyor belt) are considered to be products more exposed to modern slavery risks due to the countries where raw materials are sourced.

During this reporting period in FY24, we did not become aware of any instances of modern slavery in our supply chain or operations. We continue to be mindful and aware of any additional modern slavery key risks within our supply chain for future reporting periods.

Risk Mitigation

During the FY24 period Peabody has continued to implement the following key control measures to identify risks that may cause, contribute to or be directly linked to modern slavery practices, whilst also mitigating and monitoring the key risks identified in our operations and global supply chain:

Ongoing Supplier Screening Processes – Peabody’s standard supplier screening questionnaire includes a section focused on modern slavery. As part of this process, we ask each new supplier to confirm that they have viewed Peabody’s Anti-Slavery Policy and are willing and able to align to those requirements. We also pose a series of questions to help Peabody identify at-risk suppliers through source of supply or exposure to high-risk products such as textiles or use of piece workers or casual labour. Any non-conforming responses are escalated for review by the Head of Supply Chain for the Australian business prior to the supplier being added to our systems. This enhanced process has been in place since 1 January 2020 and was applied to all new suppliers to Peabody during FY24.

Contractual Protections – Peabody’s Supply Contract Template and Purchase Order Terms and Conditions were applicable during FY24 to 100% of new physical supply contracts and purchase orders negotiated and issued included a positive obligation on our suppliers to comply with the Modern Slavery Act, implement a due diligence process to identify modern slavery in their supply chains, report any potential breaches of modern slavery requirements and maintain records that may be subject to future review and audit by Peabody.

Policies – As previously noted, Peabody has in place an Anti-Slavery Policy, along with a Whistleblower Policy and Code of Conduct (**Peabody’s Policies**) which provides additional employee and contractor support and guidance in identifying modern slavery risks. Our Code of Conduct and Whistleblower Policy also assists in facilitating anonymous and confidential reporting, which is encouraged for any suspected wrongdoing, unethical or improper conduct or dangers at work. Peabody’s Policies are regularly reviewed and updated to allow for continuous improvement as the risks of modern slavery heighten. The Peabody Policies can be accessed at www.peabodyenergy.com.

Vendor Code of Conduct – Peabody’s Vendor Code of Conduct serves as a risk control mechanism by requiring all vendors to adhere to a range of ethical, legal, and safety standards prior to initial engagement for supply of goods and services. These standards include specific requirements relating to labor, human rights, and employment, referencing globally-recognised protocols such as the International Bill of Human Rights, the United Nations (UN) Guiding Principles on Business and Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.



Clearly outlining Peabody's expectations and providing a range of independent communication channels for concerns to be raised, Peabody further reduces risks associated with non-compliance and fosters a culture of accountability and responsibility among business partners. Failure to comply may result in termination of business relationships. Further information on the Vendor Code of Conduct can be found at the above link.

Due diligence and supplier engagement – In the FY24 period, and as a part of our regular operations, Peabody continued to review and improve due diligence processes on modern slavery risks and practices. Our actions undertaken during the FY24 reporting period are included in this Statement below, and we further aim to improve due diligence within this space by identifying gaps in our risk assessment mechanisms and maintaining supplier relationships.

Effectiveness in combatting modern slavery

To date, and in particular within the FY24 period, Peabody has not had any known breaches of modern slavery requirements through its contracting instruments, nor have any modern slavery risks been flagged through our enhanced due diligence process or supplier screening processes. Whilst we have additional improvements planned to further strengthen our controls and diligence activities, Peabody is satisfied that the controls implemented to date have been effective in mitigating (though not eliminating) potential modern slavery risks in supply chains.

Actions completed in FY24

During FY24, we continued to strengthen our governance and risk mitigation controls through the following key tasks:

- Actively worked with the 16 suppliers assessed as medium-risk within the FY23 audit, closing out the range of policy and execution gaps identified. All items were closed in a satisfactory manner, with some suppliers ceasing to trade with Peabody through the natural course of business.
- Conducted one 'in-country' site audit of one of Peabody's key mainland China suppliers of rock cutting tools, drawing on specialised and local expertise to improve the comprehensiveness of responses. The outcomes of this audit were discussed between local Peabody management and the supplier, with an overall medium risk rating determined. Key action items agreed for progression in FY25 relate to curtailing employee-requested overtime work on consecutive days, regardless of whether overtime is requested by employees.
- Expanded our supplier audit program with support from Bureau Veritas to a third tranche of suppliers, which included an additional 20 suppliers over and above the 110 suppliers audited during FY22-23. The 130 suppliers audited to date represent approximately 70% of our supply-side annual spend for the Australian business. Suppliers beyond this point were either short-term or small local businesses and therefore considered low risk.
- The summary results of the FY24 audit were that 19 of the 20 suppliers were given a low risk rating with no further action required, and one supplier was given a medium risk rating with some follow up actions agreed to be closed out during FY25.
- Ensured that our largest suppliers committed to the latest version of Peabody's Anti-Slavery Policy and Vendor Code of Conduct through ongoing contract negotiations and supplier engagements.
- As member of the Mineral Council of Australia in FY 24, Peabody self-assessed against the Towards Sustainable Mining (TSM) protocols. The Australian minerals industry has adopted the TSM protocols as a globally recognised accountability framework which supports minerals companies to evaluate, manage and communicate their sustainability performance. The TSM includes a verification protocol to aid the



prevention of child and forced labour, and to provide guidance to member companies on verification requirements regarding systems to prevent child and forced labour.

Future Actions Planned for FY25

- Continue to engage with the one Australian supplier given a medium risk rating in FY24 to complete agreed closure actions by year end.
- Monitor and review progress of agreed actions relating to our China-based supplier audit, supported by leadership from our China office.
- Should Peabody's recently announced acquisition of Anglo American's Queensland-based mines be completed in 2025, conduct a review of Anglo American's Modern Slavery governance regime with an objective to integrate and refresh the organisation's top 100 suppliers and merge governance processes and systems.
- Target an audit review of at least 30 suppliers from the refreshed supplier list.

Assessing effectiveness of actions

We understand that in order to continue to assess the qualitative and quantitative effectiveness of our actions in mitigating the risk of modern slavery occurring in our supply chain and operations, we need to implement key performance indicators and mechanisms.

All contractual terms included for suppliers and contractors have been accepted, and in the FY24 reporting period we did not receive any reports on modern slavery instances within our operations of supply chain.

Consultation process

In preparing this statement, Peabody has consulted with the entities on behalf of whom this joint statement is submitted through discussions with key stakeholders.

This FY24 Modern Slavery Statement has been approved by the Board of Directors of PIC on behalf of all reporting entities listed in the section titled 'Our Organisational Structure'.

The signatory is a Director and responsible member of PIC and is authorised to sign this FY24 Modern Slavery Statement by the Board of Directors of PIC.

A handwritten signature in blue ink, appearing to read 'M J Jasutis', is written over a light blue horizontal line.

Michael Jasutis
Director
Peabody Investments Corporation