



Peabody Investments Corp.

2023 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 fourth joint Modern Slavery Statement for its Australian operations and covers the reporting period of 1 January 2023 to 31 December 2023 (**FY23**).

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 FY23 reporting period based on steps from our previous Modern Slavery Statement for the FY22 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 FY24 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 (formerly North Goonyella) Mine



Our Position on Modern Slavery

Integrity is one 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 224 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 COALSALLES Pacific Pty Ltd	146 797 408	14
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	441



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 June 21, 2024 .

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, 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 FY23, 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 FY23 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 completed by all new suppliers to Peabody during FY23.

Contractual Protections – Peabody’s Supply Contract Template and Purchase Order Terms and Conditions were applicable during FY23 to 100% of new 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 regularly 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 FY23 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 FY23 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 FY23 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.

Impact of COVID-19

As at the date of this FY23 Modern Slavery Statement we are not aware of the COVID-19 pandemic giving rise to any additional modern slavery risks in our operations or supply chains.

Actions completed in FY23

During FY23, we continued to strengthen our governance and risk mitigation controls through the following key tasks:

- 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.
- Building on the supply base risk assessment and audit program commenced in FY22, in FY23 Peabody worked with our Top 50 suppliers by spend to close out any policy and execution gaps identified as part of the FY22 audit process.
- Conducted a second tranche of supplier audits broadening the scope to include our top 100 higher risk suppliers with support from Bureau Veritas as an independent, third-party audit and quality assurance organisation specialising in modern slavery risk assessments. An additional 53 suppliers were surveyed in FY23, from which a total of 16 suppliers were identified as containing some element of their response judged to be medium risk. The significant majority of identified -risk flags related to the adequacy of demonstrable modern slavery guidelines, policies and procedures being clearly communicated within those businesses. These suppliers require further follow-up to close identified gaps during FY24.

Of note, zero suppliers evaluated during FY23 were assessed as being high risk.

- As member of the Mineral Council of Australia, in FY23 Peabody committed to comply and report 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. During FY23 Peabody conducted a review of the TSM protocols relating to child and forced labour to ensure our existing modern slavery governance and controls satisfied TSM requirements.

Future Actions Planned for FY24

- Actively work with the 16 suppliers assessed as medium-risk within the FY23 audit, in order to close the range of policy and execution gaps identified.
- Conduct one 'in-country' audit of one of Peabody's key mainland China suppliers, drawing on specialised and local expertise to improve the comprehensiveness of responses.
- Expand our supplier audit program to a third tranche of suppliers, to include an additional 50 suppliers. This will bring our total number of suppliers under audit to 150 suppliers, equating to 85% of our total supply side spend for the Australian business.
- Continue our relationship with the HRREC forum, seeking opportunities to embed good practice within our own business and share our own insights with industry peers.
- Explore alternative audit options provided by Bureau Veritas and other third party platforms, as market knowledge and expertise relating to these services evolves.

Assessing effectiveness of actions

We understand 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 FY23 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 FY23 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 FY23 Modern Slavery Statement by the Board of Directors of PIC.

A handwritten signature in blue ink, appearing to read "Mike Jasutis", is written over a light blue horizontal line.

Mike Jasutis
Director
Peabody Investments Corporation