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## Vitrinite joint modern slavery statement

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Adopted on 22 December 2023

# Joint modern slavery statement

Vitrinite Pty Ltd ACN 167 744 578

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## Introduction

The *Modern Slavery Act 2018* (Cth) (**Act**) entered into force on 1 January 2019. The Act established a national modern slavery reporting requirement (**Reporting Requirement**).

This joint modern slavery statement (**Statement**), which is intended to meet the Reporting Requirements of the Act, is made on behalf of Vitrinite Pty Ltd ACN 167 744 578, Vitrinite Holdings Pty Ltd ACN 614 033 180 and Vitrinite Holdings LLC and the following entities in compliance with the Act:

- 1 Holston Pty Ltd ACN 166 910 925;
- 2 Callan Coking Coal Pty Ltd ACN 644 199 397;
- 3 Qld Coal Aust No.1 Pty Ltd ACN 135 731 154;
- 4 Queensland Coking Coal Pty Ltd ACN 129 600 004;
- 5 Ranger Equipment Pty Ltd ACN 630 099 302; and
- 6 Vulcan Mine Management Pty Ltd ACN 639 921 430,

(each a **Group Entity**, collectively referred to as **Vitrinite, we, us, our** in this Statement).

This is Vitrinite’s first modern slavery statement, which seeks to minimise the risk of modern slavery occurring in our business and supply chains and has been prepared for the financial year of 1 July 2022 to 30 June 2023 (**Reporting Period**).

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our business, operations and supply chains.

## What is Modern Slavery?

Modern slavery describes circumstances where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Forms of modern slavery include:

- 1 human trafficking;
- 2 forced labour;
- 3 child labour;
- 4 forced marriage;
- 5 debt bondage;
- 6 servitude;
- 7 barriers to free association; and
- 8 slavery and related practices.

These actions are a violation of human rights, are against the law, and contradict Vitrinite’s values.

## Our commitment

We have a zero-tolerance approach to any form of modern slavery within our business and supply chain. We are committed to working against modern slavery by:

- 1 identifying, assessing and mitigating modern slavery risks in our operations and supply chains; and
- 2 being compliant with all modern slavery legislation.

Effective management of modern slavery is an ongoing process, and we are dedicated to continually developing and improving our modern slavery practices.

## **Business overview**

### **Our structure**

Vitrinite is an Australian proprietary limited company established in 2014 and is based in Queensland, Australia. We explore and develop coking coal assets, produce hard coking coal and associated activities, employing approximately 120 people (including contractors).

We are jointly owned by Vulcan Partners Pty Ltd, Vitrinite Holdings LLC, Vitrinite Holdings Pty Ltd and the Phillips family.

### **Our operations**

We have interests and operations spanning coal mining and exploration, with sales from coal mining operations being the dominant source of Vitrinite’s earnings.

We operate the Vulcan Mine Complex, an open cut mine producing hard coking coal and employ approximately 120 people across our sites and offices.

A summary of our operations is as follows:

<b>Activity</b>	<b>Description and location</b>
Coal mining including development and exploration	We conduct exploration programs on our exploration permits for coal in the Bowen Basin, proving up coking coal assets for development. We also produce a high quality PLV coking coal from Vulcan Mine, by open cut methodologies, up to 1.95mtpa.
Coal sales and marketing	We sell our hard coking coal to nearby mines, on a raw basis, who then process the coal through their facilities, before railing the product to port.
Associated coal haulage and civil construction activities	Coal is hauled to our customers on public roads, which are nearby mines with surplus infrastructure and capacity. Other activities associated with mining coal include construction of required infrastructure or road works which relate to haulage routes.

### **Our supply chains**

Vitrinite’s procurement expenditure is dominated by the sourcing of transport services, diesel fuel, mining equipment and parts, tyres and explosives, all of which are key items used in the process of extracting and transporting our products.

Supply of these key items is provided by a range of suppliers including regional and local Australian entities, major Australian entities or Australian subsidiaries of larger multinational groups. These organisations have sophisticated supply chain policies and procedures in place and have published reports in accordance with the Act.

A smaller percentage of overall expenditure is applied to the sourcing of a multitude of other goods and services relevant to our activities. These include supply of consumables, logistics, utilities, mining services, cleaning, consultancy and technical services. Overwhelmingly the suppliers of these items are Australian companies, with many being local suppliers in the area of our operations.

Any goods which are imported for Vitrinite’s benefit are consumed within its operations. Vitrinite does not import any goods for resale.

Externally purchased materials, services and equipment represent a dominant share of our supply chain.

**Modern slavery risk assessment and management**

The most significant modern slavery risks associated with our supply chain during the Reporting Period were identified as being:

<b>Technology</b>	Software licences, computer hardware, electronic equipment – mobile phones, tablets, office supplies/printing
<b>Services</b>	Labour services, professional services – engineering, legal, finance, project management, maintenance services, fabrication services, drilling services
<b>Bulk materials</b>	Diesel, oils, greases, explosives, steel, timber and cement
<b>Maintenance, repair and operations</b>	Mining equipment, fixed plant equipment, conveyors, pumps, hydraulic equipment and components, industrial supplies/tools
<b>Personal protective equipment</b>	Uniforms, respiratory safety equipment, auditory and sight safety equipment
<b>Facilities management</b>	Accommodation services including catering, facilities services – cleaning, cleaning chemicals and equipment
<b>Energy and shipping</b>	Retail electricity supply, shipping activities of product and consumables

During the Reporting Period, various measures were in place to manage the risks of modern slavery practices occurring in our operations and supply chains including:

- (a) policies and procedures;
- (b) contract terms;
- (c) engaging with suppliers; and
- (d) employee and supplier training and engagement.

**Policies and procedures**

We have a number of key policies in place to manage the risks of modern slavery within its operations or supply chain. These include our:

- (a) modern slavery policy, which is designed to assist us in ensuring that any suspected or actual modern slavery taking place within our business or in any of our supply chains is reported so it can be addressed; and
- (b) whistleblower policy, which affords certain protections against reprisal, harassment or demotion for making reports about behaviour that contravenes law and Vitrinite’s policies, including reports of modern slavery.

**Contract terms**

All of the terms of our largest contracts include modern slavery compliance obligations, however, many of our existing smaller contracts and purchase orders do not contain such provisions. Our intention is to undertake a review and moving forward incorporate these provisions into our standard purchase order terms and conditions, as well as in any future extensions and re-negotiations of other contracts to ensure our, and our supplier’s, ongoing compliance with the Act.

**Engaging with suppliers**

We are considering introducing a supplier due diligence questionnaire for our supply chains to assist us in identifying potential or actual instances of modern slavery. We intend to investigate the viability and practicableness of introducing a supplier due diligence questionnaire by engaging with the suppliers in our immediate supply chains to understand the implications and potential outcomes of such an initiative.

**Employee and supplier training and engagement**

From 1 July 2023 onwards, we intend to incorporate regular training to the board (delivered by an external supplier), relevant employees and contractors regarding the risks of modern slavery within our business into our broader training programmes. This will include training on how to identify modern slavery practices and the particular parts of our operations and supply chains that are subject to a greater risk of modern slavery. This training will also form part of the induction process for relevant individuals, whether as an employee or a contractor.

**Assessing our effectiveness in combating modern slavery**

We measure how effective we have been to ensure that modern slavery is not taking place in any part of our business or supply changes using various metrics which have been summarised in the following table:

Action	Metric	Details
Policies and procedures	Number of instances of issues concerning modern slavery identified from ongoing monitoring under relevant policies and procedures and in the general course of business. Number of people who reported issues concerning modern slavery.	During the Reporting Period, there were no incidents identified or reported concerning allegations of modern slavery within our operations or supply chains.
Contract terms	Contracts entered into by Vitrinite or extension of existing contracts containing modern slavery compliance obligations.	Our largest contracts entered into or extended in the Reporting Period contained modern slavery obligations. We are also investigating incorporating modern slavery obligations into our standard purchase order terms and conditions.
Employee and supplier training and engagement	Number of people within our business who received modern slavery training.	During the Reporting Period, we did not deliver modern slavery training. We intend to deliver modern slavery training to the board and senior managers in the next reporting period.

**Future focus**

This is our inaugural modern slavery statement. Vitrinite recognises that there are further steps to be taken to assess and address the risks of modern slavery in our operations and supply chains and is committed to further development and improvement each year.

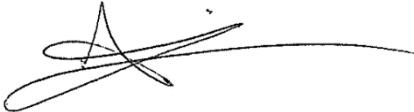
We intend to continue reviewing and updating all policies and procedures adopted by us.

**Consultation**

During the Reporting Period, Vitrinite has been engaging with each of the Group Entities covered by this Statement to ensure they understand their obligations under the Act and that they are taking appropriate steps to identify and mitigate risks of modern slavery in their supply chains and operations. Each Group Entity has also reviewed this Statement to ensure it accurately reflects key risks of modern slavery and steps in mitigating these risks.

**Oversight and governance**

This Statement was approved by the Board of Directors of each of the Group Entities on or about 22 December 2023.



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Signature

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Name of director

22 December 2023

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Date