



# **QCoal Group Modern Slavery Statement 2024**

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## Scope

As an Australian business generating annual consolidated revenue in excess of \$100 million, QCoal Group is required to prepare and publish an annual Modern Slavery Statement in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* ('Modern Slavery Act' or 'The Act'). All references to 'QCoal', 'QCoal Group', 'the Company', 'the Group', 'we', 'us' and 'our' refer to QCoal Pty Ltd (ABN 99 010 911 234) and the entities it controls, unless otherwise stated.

## Reporting Entities

This Modern Slavery Statement ('Statement') has been prepared for the compliance period 1 July 2023 to 30 June 2024 and is a joint statement made under section 14 of the Modern Slavery Act on behalf of the following subsidiaries that qualify as reporting entities under the Act (i.e. minimum annual revenue of \$100 million):

- **QCoal Pty Ltd** (ABN 99 010 911 234)
- **Northern Hub (Drake) Pty Ltd** (ABN 86 609 547 033)
- **Jax Coal Pty Ltd** (ABN 89 133 499 500)

This Statement sets out the actions QCoal Pty Ltd and its subsidiary reporting entities (collectively 'QCoal Group' or 'the Group') have taken to identify, assess and mitigate any actual or potential modern slavery risks in QCoal Group's operations and supply chains for the 12 months ended on 30 June 2024.

## Consultation with Subsidiaries

All QCoal Group subsidiaries operate under common policies and procedures, including in relation to modern slavery and human rights. The subsidiaries within the Group also have at least one common Director. Accordingly, there is common oversight of all QCoal Group activities.

The FY24 Modern Slavery Statement was developed in consultation with our Modern Slavery Working Group with cross-functional collaboration between various teams including Finance, Procurement, Legal, Marketing and relevant operations personnel. These teams operate across all business functions for QCoal Group subsidiaries.

During the year, our environmental, social and governance ('ESG') Management team conducted a briefing and information exchange with representatives from each functional team to raise awareness and to enquire of modern slavery risk factors within our subsidiary operations. These representatives were also given the opportunity to review and comment on the Statement.

## Compliance

This Statement has been reviewed for internal legal compliance, however, has not been subject to external assurance or review.

**This statement was approved on 9 December 2024 by the board of QCoal Pty Ltd which is the principal governing body for the reporting entities named in this statement for the purposes of the *Modern Slavery Act 2018 (Cth)*.**

# Acknowledgement

QCoal acknowledges the Traditional Owners and Custodians of the land on which we operate and conduct our business.

We pay our respects to Elders past, present and emerging. We also recognise those Aboriginal and Torres Strait Islander peoples who make an important contribution to the ongoing success of QCoal.

As a mining company, we recognise the enduring connections that First Nations peoples have to Country and their unique role in the stewardship of these lands for thousands of years.

We are committed to engaging respectfully and collaboratively with Traditional Owners and communities to ensure the sustainable and responsible development of resources while protecting cultural heritage and promoting reconciliation.



Artwork by indigenous artist Chantelle Cooktown, a proud Yidinji woman and member of the Byerwen Sodexo team. Reproduced with permission.

# Managing Director's Message



QCoal Group is pleased to present its FY24 Modern Slavery Statement which outlines our actions to identify, assess and mitigate modern slavery risks within our operations and supply chains.

As we navigate an increasingly complex global marketplace, the mining industry's commitment to ethical business practices and human rights has never been more crucial. Modern slavery, in all its forms - whether forced labour, human trafficking, or exploitative practices - remains a pervasive issue worldwide. QCoal Group recognises that our reach extends far beyond our immediate operations, and the potential risks within our supply chain must be vigilantly identified, addressed, and eradicated.

This report represents our ongoing commitment to transparency and accountability. Within it, we outline the steps we have taken over the past year to assess, monitor, and mitigate modern slavery risks across our operations and supply chain. As a business, we are committed to a zero-tolerance policy as part of our ongoing management of modern slavery risks and we have taken steps during FY24 to strengthen our governance and decision-making processes in relation to human rights and modern slavery accountability.

Our approach to modern slavery is not just a matter of compliance; it is an expression of our core values and commitment to refining our practices and ensuring the highest standards are upheld in every corner of our business.

A handwritten signature in black ink, appearing to read 'C Wallin', with a small mark above the end of the signature.

**Christopher Wallin**  
Managing Director



# About us

**QCoal Group is a proudly independent Queensland-based company, and our coal projects represent that focus.**

At QCoal we have been active in coal exploration, discovery and development in Queensland since 1989. As our mining projects are predominantly based in Central Queensland, each project supports thousands of workers, their families and the regional communities where they live. For each and every one of our coal projects, we strive to run our operations in an economically, socially and environmentally responsible way. This gives us the framework to ensure that we are continually focused on bettering Queensland and Australia as a whole. Our operations include the QCoal Northern Hub (consisting of the Drake, Jax, Sonoma and Cows mines), Cook Colliery and Byerwen Mine (refer to separate Modern Slavery statement).

## QCoal Group Values

### Safety

We create a safe workplace where our people are encouraged to lead others, be accountable and act responsibly. We strive to keep our operations injury and fatality free by monitoring plant, equipment and processes.

### Employee Choice

We believe allowing our people to choose to live locally or commute to work is an important factor in their decision to work for us, and to continue working for us.

### Integrity

Delivering on our commitments and holding ourselves to account earns the respect of our internal and external stakeholders.

### Innovation

An entrepreneurial approach is key to finding better ways to create value, in good times and bad.

### Trust

We work with capable, self-motivated people who enjoy the opportunity and freedom to do their job. The latitude we give our team makes for challenging and exciting work.

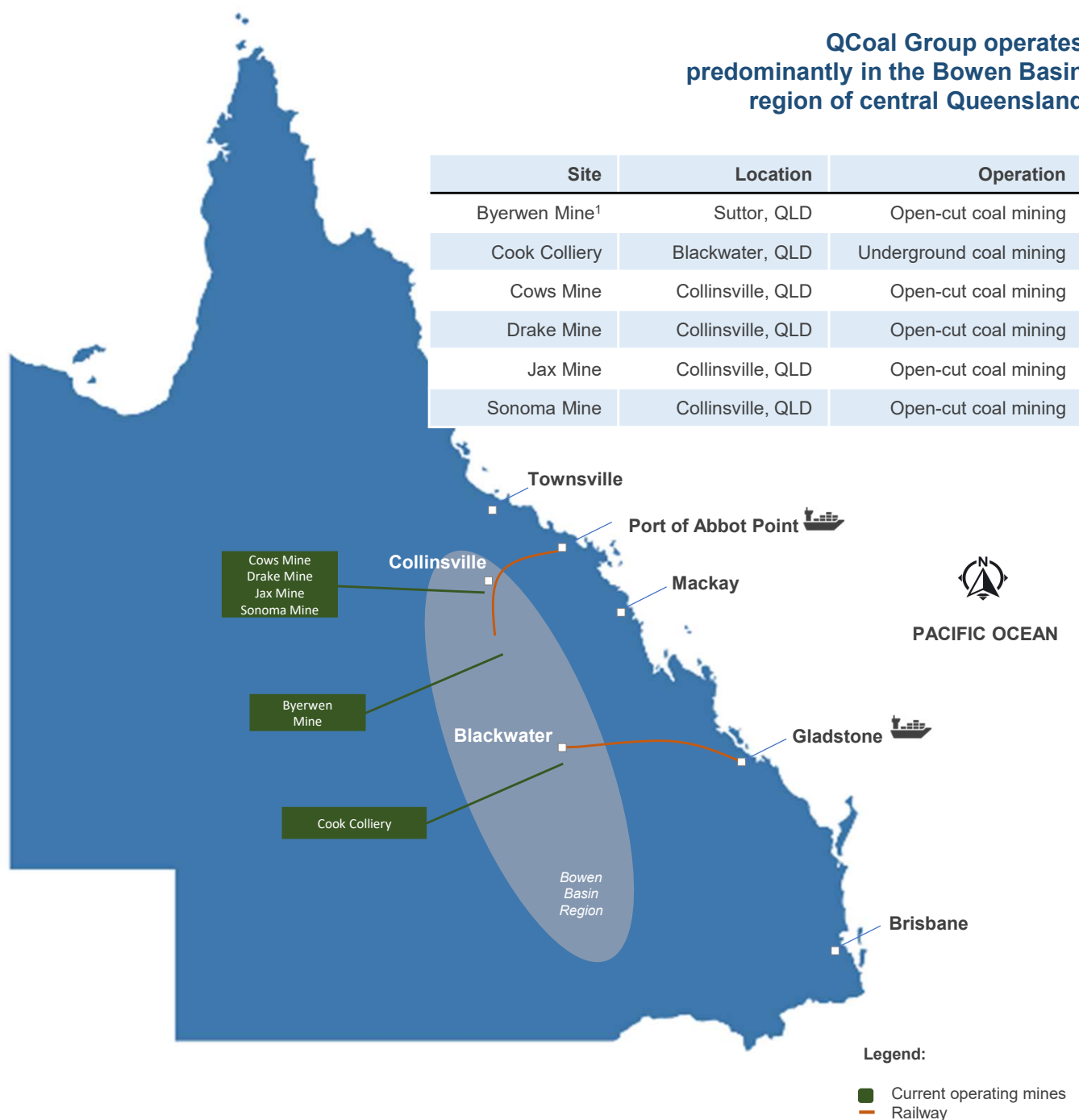
### Pragmatism

We don't hide behind hierarchy, processes or systems that hinder rather than help.



# 1 Structure, Operations and Supply Chain

**QCoal Group operates predominantly in the Bowen Basin region of central Queensland**



The QCoal Group is a Queensland-based, privately owned mining company which has been active in coal exploration, project development and coal production in Queensland since 1989. The Group's assets consist of a portfolio of open-cut and underground mines with operations located in Queensland's Bowen Basin as well as a number of exploration projects in the same region.

The Group's operations are located near Collinsville, comprising the Sonoma, Drake and Jax Mines (collectively the '**QCoal Northern Hub**') and the Cook Colliery ('**Cook**') near Blackwater. Both operations are contract mining operations.

In FY24, the QCoal Group exported 5.1 MT of coking and thermal coal from its operations. This excludes coal exported from the Byerwen Mine during the year (please refer to the *Byerwen Group Modern Slavery Statement* for further details).

The majority of QCoal's coking coal and by-product thermal coal is exported to foreign markets in Asia, Europe and the Middle East. Over 99 per cent of the Group's sales in FY24 (by tonnage) were to the Asian region.

The QCoal Group had 75 direct employees as at 30 June 2024 and indirectly employed approximately 700 further workers through its key contractors.

The QCoal Group's corporate head office is located in Brisbane.

The core activities within our operations include coal mining, handling, and processing and general exploration of mining assets. Other functions within the Group include leasing, maintaining and dry-hire of mobile mining equipment.

# 1 Structure, Operations and Supply Chain

## QCoal Northern Hub

The QCoal Northern Hub is based in Queensland's Bowen Basin region near Collinsville and includes the Drake, Jax, Sonoma and Cows mines.

The Northern Hub is an excellent example of QCoal Group's hub model for world-class operations which minimises environmental disturbance and vastly improves our capital and operating efficiency. It also ensures the long-term viability of our operations in the Bowen Basin.

Our open-cut mines seamlessly transform raw materials into high-grade coal which is railed to Abbot Point Coal Terminal near Bowen for export to customers around the globe.

Location	South of Collinsville, Bowen Basin, Queensland
Method	Open-cut
Product	Hard coking coal and thermal coal
Traditional Owners	Birriah People
First coal	2008

## 6 million tonnes

Production capability per year

## 600 jobs

Workforce consisting of employees and contractors at peak capacity



## Cook Colliery

The Cook Colliery is located approximately 27 kilometres south of Blackwater in Queensland's Bowen Basin and was added to QCoal's portfolio following its acquisition from Bounty Mining in 2020. At the time of its acquisition the underground metallurgical mine had been in care and maintenance since December 2019. However, under QCoal's stewardship Cook Colliery returned to operational status in February 2022.

The mine site has a long history that stretches back to the 1970s with both longwall and bord and pillar mining methods in use during this time. At the centre of Cook Colliery's output is a high-quality coking coal (which boasts high fluidity, medium volatility and a low sulphur profile) and a high-quality thermal coal by-product.

Location	South of Blackwater, Bowen Basin, Queensland
Method	Underground – bord and pillar extraction, transitioning to place-change
Product	Hard coking coal and thermal coal
Traditional Owners	Ghungalu Nation People
First coal	1970, 2022 (QCoal restart)

## 1 million tonnes

Production capability per year

## 220 jobs

Workforce consisting of employees and contractors at peak capacity



# 1 Structure, Operations and Supply Chain

During FY24, QCoal Group conducted a review of its supplier base which included an assessment of approximately 500 suppliers. These suppliers have been categorised into a broad range of procurement categories covering goods and services relating to exploration, drilling, mining services, equipment, logistics and business support functions.

Procurement activities within the QCoal Group are conducted through a central function based in the Brisbane head office. These activities include procurement governance, contract administration, supplier engagement, invoice processing and payments.

All major expenditure is procured in Australia from a small number of large contractors and suppliers who are Australian entities with documented procurement policies and procedures. QCoal Group is satisfied that our identified risks of modern slavery arising are substantially the same as for the FY23 reporting period.

**75**

**Direct employees of QCoal Group as at 30 June 2024**

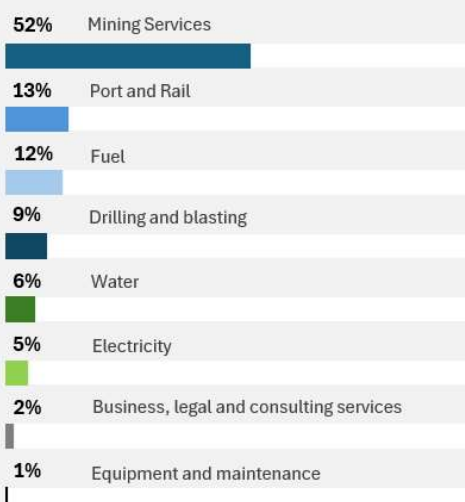
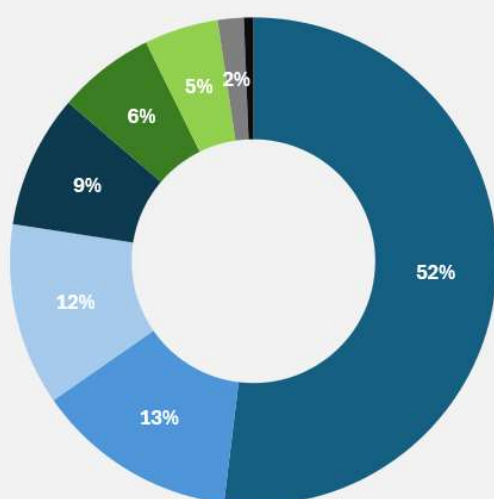
**730**

**Contractors employed across our operations as at 30 June 2024 <sup>1</sup>**

**440**

**Suppliers paid during the period ended 30 June 2024 <sup>2</sup>**

**Summary of percentage spend by procurement category <sup>3 4</sup>**



## QCoal's Mine to Market Lifecycle

The mine to market lifecycle for QCoal Group involves several stages from the extraction of coal to its ultimate delivery to end users and rehabilitation of operating sites.



<sup>1</sup> Excludes contractors employed at the Byerwen Mine.

<sup>2</sup> Excludes suppliers paid relating to Byerwen Mine procurement.

<sup>3</sup> Excludes government, tax and other regulatory payments.

<sup>4</sup> Excludes intercompany payments between QCoal Group entities and other related parties.



## 2 Risks of Modern Slavery

### Risks in Operations

During FY24, the mining operations of the QCoal Group were carried out entirely within Queensland, Australia. Accordingly, we have assessed that risks of modern slavery are more significant in our broader supply chain than in our local mining operations. All QCoal Group employees are engaged on terms and conditions which comply with Australian employment law. Employees are also free to join and be represented by unions.

### Risks in Supply Chains

Sourcing and procurement of goods and services through sustainable supply chain practices is a key priority of QCoal Group. In doing so, we are committed to maximising local industry participation and our contractors give preference to suppliers of Australian-sourced goods, services and equipment that is competitively priced and complies with Group procurement policies and vendor purchasing requirements.

Despite this, we recognise that even if a supplier is based in Australia, it may have supply chains and/or related entities in foreign jurisdictions which may increase the risk of modern slavery. QCoal Group's risk assessment therefore incorporates a holistic approach to supplier risk management that considers a range of factors such as procurement category, country of origin, supplier governance and total spend metrics. This is important as a supplier operating in a higher-risk jurisdiction, for example, may have robust and effective control frameworks in place to mitigate the risks of modern slavery. It also highlights the need for effective ongoing engagement with suppliers to ensure risk assessments are up-to-date and that emerging risks are identified in a timely manner.

Our ongoing due diligence processes include an annual assessment of both Tier 1 suppliers and other potential high-risk suppliers within our supply chain. These risks are evaluated based on QCoal's modern slavery Supplier Risk Matrix.

### Modern Slavery Supplier Risk Matrix

During FY24, QCoal Group implemented a Supplier Risk Matrix to assess and evaluate our operational risk and supply chain risk. The matrix is based on various factors such as geography, industry, labour practices, supplier size, and transparency of reporting. The matrix helps identify high-risk suppliers and prioritise actions accordingly.

After evaluating a supplier on each of the risk factors categories, each factor is assigned a score from 1 (low risk) to 3 (high risk). The total score helps determine the overall risk level of the supplier.

**Low Risk (Total Score 5-7):** Routine monitoring and standard due diligence are sufficient, with periodic checks and engagement to ensure ongoing compliance.

**Medium Risk (Total Score 8-11):** Further due diligence and targeted risk mitigation efforts are prioritised. This may include more frequent engagement with the supplier to address identified gaps.

**High Risk (Total Score 12-15):** Immediate action is required, including detailed audits, corrective action plans, and potentially re-evaluating or discontinuing the business relationship if the supplier is unable to address the identified risks.

Risk Factor	Low Risk (1)	Medium Risk (2)	High Risk (3)
Geography (location of supplier)	<ul style="list-style-type: none"><li>Supplier operates in a low-risk country with strong labour laws (e.g. Australia, Western Europe, North America, etc.)</li></ul>	<ul style="list-style-type: none"><li>Supplier operates in countries with moderate risk of labour exploitation (e.g. Eastern Europe, some parts of Latin America)</li></ul>	<ul style="list-style-type: none"><li>Supplier operates in high-risk countries with weak labour laws or known for modern slavery risks (e.g. parts of Southeast Asia, sub-Saharan Africa)</li></ul>
Industry sector	<ul style="list-style-type: none"><li>Low-risk industries with strong labour standards (e.g. technology, finance, professional services)</li></ul>	<ul style="list-style-type: none"><li>Moderate-risk industries where labour abuses are occasionally reported (e.g. retail, food processing, manufacturing)</li></ul>	<ul style="list-style-type: none"><li>High-risk industries known for exploitative labour practices (e.g. agriculture, textiles, construction, domestic work)</li></ul>
Supplier size and resources	<ul style="list-style-type: none"><li>Large, well-established suppliers with established ethical sourcing programs and certification (e.g. ISO, Fair Trade)</li></ul>	<ul style="list-style-type: none"><li>Medium-sized suppliers with some risk mitigation practices but lacking full certifications or clear policies</li></ul>	<ul style="list-style-type: none"><li>Small or informal suppliers, often with limited resources for risk management or no certifications</li></ul>
Labour practices	<ul style="list-style-type: none"><li>Supplier has clear policies and practices in place to prevent forced labour, child labour, or exploitation</li></ul>	<ul style="list-style-type: none"><li>Supplier has some labour policies, but practices or monitoring are inconsistent across operations</li></ul>	<ul style="list-style-type: none"><li>Supplier has no clear labour policies, poor monitoring, or history of non-compliance with labour standards</li></ul>
Transparency and reporting	<ul style="list-style-type: none"><li>Supplier is transparent about operations and regularly publishes reports on labour conditions, sustainability, and compliance</li></ul>	<ul style="list-style-type: none"><li>Supplier provides some transparency but lacks detailed reporting or regular updates on labour practices</li></ul>	<ul style="list-style-type: none"><li>Supplier is non-transparent or opaque about operations and has not provided labour practice reports or certifications</li></ul>

## 2 Risks of Modern Slavery

### Higher-risk Supplier Categories

Using our Supplier Risk Matrix, we identified the following supplier categories which are considered 'higher-risk' in relation to modern slavery practices in our supply chains.

Risk Category	Key Risk Factors
Facility management	<ul style="list-style-type: none"> <li>This category encompasses office, site and mining support such as cleaning, catering, on-site security and other mining support involving manual or low-skilled labour.</li> <li>This workforce is often structured through sub-contract arrangements with the risk of misleading and exploitative recruitment and retention practices.</li> </ul>
Blasting supplies	<ul style="list-style-type: none"> <li>Blasting explosives and chemicals are used throughout various stages of QCoal's mining operations and in our coal handling and preparation plants.</li> <li>Key risks relate mainly to the materials and inputs used to manufacture the chemical and explosives which are often extracted and refined in high-risk countries.</li> </ul>
Shipping	<ul style="list-style-type: none"> <li>The majority of QCoal's product is exported to foreign markets. Our customers are responsible for utilising shipping agents and port services for ship loading and other logistics.</li> <li>Ports and shipping agents generally don't have operational control or oversight of conditions onboard vessels, resulting in limited visibility on labour practices.</li> </ul>
Personal protective equipment (PPE)	<ul style="list-style-type: none"> <li>PPE and other apparel used on site is often manufactured in higher-risk jurisdictions utilising a lower skilled and lower paid workforce.</li> <li>Key risks relate to vulnerable and at-risk migrant workers where supply chains are long and complex.</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>QCoal Group utilises a range of technology that enables us to operate our business across multiple operating sites.</li> <li>Technology supply chains can be complex, and hardware products are often manufactured in multiple locations and higher-risk jurisdictions with potential for forced and/or child labour.</li> </ul>

### FY24 Supplier Assessment Results<sup>1</sup>

During FY24, we found the majority of assessed suppliers were categorised as 'low' or 'medium' risk based on the Supplier Risk Matrix, with no suppliers meeting the risk definition of 'high' risk.

#### Low risk Suppliers

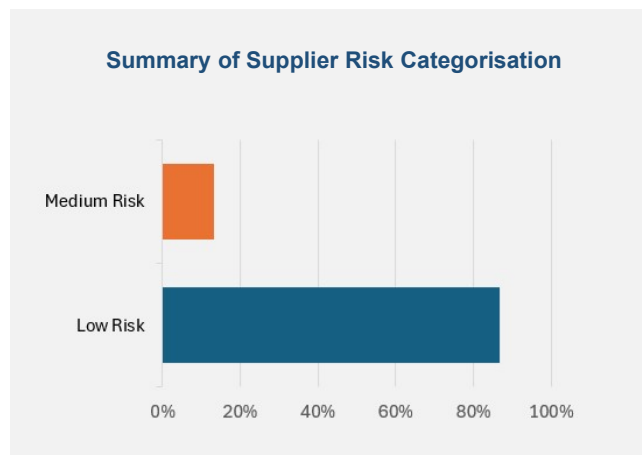
A significant portion of our suppliers were assessed as low risk, meaning that they demonstrated strong labour practices, complied with applicable employment laws and showed clear commitment to preventing modern slavery through established policies, processes and frameworks. These suppliers had transparent operations, provided good working conditions for employees, and actively engaged in ethical sourcing practices.

#### Medium risk Suppliers

A smaller proportion of suppliers were categorised as medium risk. These suppliers operated in regions or industries where the risk of modern slavery was more prevalent, but they had demonstrated efforts to mitigate those risks through policies, audits, and supplier agreements.

#### High risk Suppliers

No suppliers were identified in the assessment as 'high' risk for the FY24 reporting period.



#### Risk Controls

- 100 per cent of assessed suppliers had frameworks and processes in place to understand and map supply chain risks.
- 93 per cent of assessed suppliers had a formal Modern Slavery policy and/or a commitment to address modern slavery supply chain risks.
- 60 per cent of assessed suppliers had a formal corrective action protocol or policy outlining actions to be taken if modern slavery risks are identified in their supply chain.
- 7 per cent of assessed suppliers sourced products and/or services from high-risk jurisdictions with lower labour standards and protections for workers.

<sup>1</sup> QCoal Group and Byerwen Group supplier assessments are conducted as a combined questionnaire.

### 3 Assessing and Addressing Modern Slavery Risks

**Modern slavery governance at QCoal is underpinned by a robust risk management and corporate governance framework to ensure effective oversight of our human rights and modern slavery risks.**

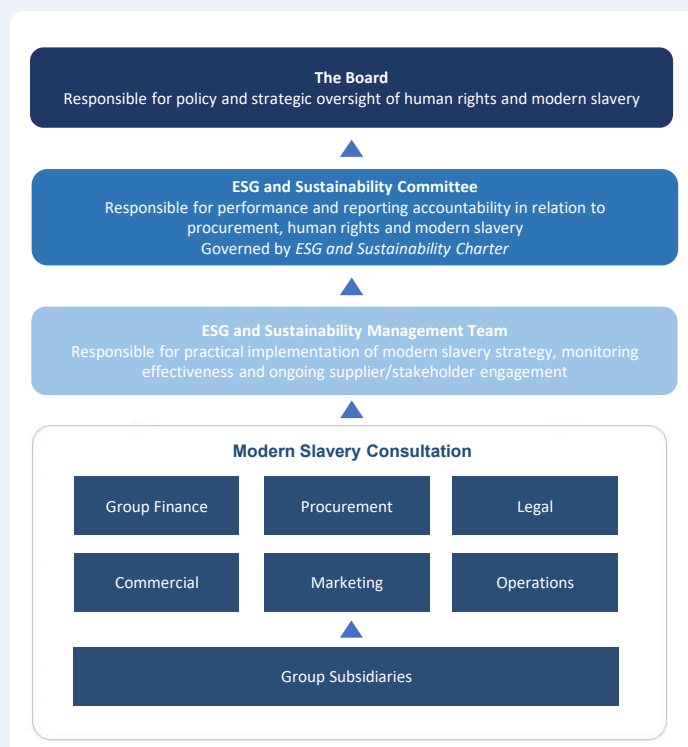
Strong sustainability governance plays a critical role in ensuring all human rights and modern slavery risks are appropriately identified and addressed throughout our operations and supply chains.

The QCoal Board has overall responsibility for our Modern Slavery Policy and the strategic oversight of human rights across our operations. The Board is regularly informed by the ESG and Sustainability Committee which is responsible for performance and reporting accountability as governed by the Group's ESG and Sustainability Charter. The ESG and Sustainability Management Team have accountability over the practical implementation of modern slavery strategy, monitoring effectiveness and ongoing supplier and stakeholder engagement.

Management consults regularly with departments and stakeholders across the Group to understand and assess the risks of modern slavery. This includes engagement with the Group Finance, Procurement, Legal, Commercial, Marketing and Operations teams.

QCoal's Corrective Action Protocol (summarised below) provides guidance in responding to instance of modern slavery identified within our operations and supply chains. In the event QCoal is found to have contributed to an actual instance of modern slavery, our immediate priority would be to ensure the safety and security of affected individuals. We would then work with relevant suppliers involved to investigate and facilitate changes to existing processes to prevent instances of recurrence.

#### Modern Slavery Governance



#### Corrective Action Protocol



### 3 Assessing and Addressing Modern Slavery Risks

2024 Progress	2025 Priorities
<ol style="list-style-type: none"> <li>Investigated and assessed options for implementing a modern slavery assessment tool across our business for evaluation of modern slavery risks and supplier risk profiling.</li> <li>Implemented a modern slavery Supplier Risk Matrix to assist in evaluating and prioritising the risks associated with suppliers based on various factors and to prioritise actions accordingly.</li> <li>Undertook a gap analysis to identify opportunities for improvement in the way we assess and address modern slavery risks in line with the <i>UN Guiding Principles on Business and Human Rights</i> ('UNGPs').</li> </ol>	<p>Progressively implement a modern slavery assessment tool to expand the scope of supplier risk engagement and develop a more in depth understanding of risks in our supply chain.</p> <p>Expand supplier and contractor engagement efforts to broaden depth and understanding of supply chain risks, transparency and traceability.</p> <p>Review and assess supplier onboarding and engagement processes including updating Supplier Code of Conduct and ensuring related procurement requirements align with UNGPs.</p>

#### Supplier Risk Assessment and Due Diligence

As part of our ongoing supplier engagement process, Tier 1 suppliers and other suppliers considered to be in a 'high-risk' procurement category were asked to complete a Supplier Assessment Questionnaire ('SAQ'). The questionnaire is designed to determine the effectiveness of governance and controls of key suppliers with the view to mitigating risks of modern slavery in our supply chains. This includes obtaining an understanding of areas such as:

- Utilisation of technology to assess supply chain visibility;
- Existence of modern slavery policy and/or frameworks to assess modern slavery compliance;
- Internal resourcing to monitor and address modern slavery risks;
- Processes for supplier engagement and collaboration on supply chain issues;
- Key sources of inputs for manufacture or delivery of products and services;
- Strategies for internal training and awareness of modern slavery risks; and
- Frameworks in place for identifying, assessing and responding to instances of modern slavery.

Upon receipt of supplier responses, an internal review is conducted to assess the suitability of information provided. Where necessary, subsequent follow up and additional information is requested to ensure QCoal Group is able to make a thorough determination on the risk profile of each supplier. A further review of publicly available governance documents is also conducted. Work is also undertaken to support and guide suppliers where necessary to improve areas of unmitigated risks.

#### Awareness Training

QCoal Group is committed to ensuring all key personnel are appropriately trained and aware of modern slavery risk factors within our operations and supply chains. Targeted training ensures that the Group is able to address the risks of modern slavery and equips our workforce with the capacity to respond appropriately where required. These sessions are delivered as part of the Group's broader efforts to raise internal capability on ESG and sustainability matters, with a focus on modern slavery awareness, regulatory reporting requirements, human rights trends and their application to the mining industry.

To further support the education of our employees, we aim to develop a modern slavery guide which provides a comprehensive overview of local and international modern slavery trends and types of risks within the mining industry. The guide is also intended to provide an overview of QCoal Group's internal policies, commitments to addressing modern slavery risks in our operations and supply chains and a yearly review of outcomes across the group.

#### Internal Policies and Procedures

QCoal Group continues to refine its internal policies and procedures in relation to human rights compliance, whistleblower protections and supplier codes of conduct. This ongoing process is key to maintaining compliance with evolving stakeholder expectations and the dynamic nature of modern slavery risks and human rights requirements. It is also important in the context of the recent Australian Government review into the effectiveness of Australia's modern slavery legislation. Of the 30 recommendations arising from the review, the Government has provided full, part or in-principle support to 25 of the recommendations resulting in likely future changes to the modern slavery reporting regime in Australia.

During the FY25 reporting period, we aim to review our Modern Slavery Policy, internal processes and readiness to respond to enhanced statutory requirements in future reporting periods.



## 4 Assessing Effectiveness

QCoal Group is committed to the ongoing improvement of our modern slavery risk management approaches including measuring the effectiveness of risk mitigation initiatives. We acknowledge that measuring effectiveness of our actions is an evolving process that requires careful consideration of the growing complexities of our supply chains.

QCoal Group will continue to mature our modern slavery risk management framework and assess effectiveness through the following:

Assessment Area	Actions
Monitoring and assessment	<ul style="list-style-type: none"> <li>Ongoing monitoring and assessment of industry best practice and keeping up to date with emerging regulatory changes and compliance requirements.</li> </ul>
Peer review	<ul style="list-style-type: none"> <li>Evaluating our own processes, procedures and governance frameworks against peers within the mining industry and other related sectors.</li> </ul>
Cross-functional engagement	<ul style="list-style-type: none"> <li>Continuing cross-functional engagement across the business to ensure risks are mitigated and driving operational awareness of modern slavery risks.</li> </ul>
Training and awareness	<ul style="list-style-type: none"> <li>Ongoing training and awareness sessions for targeted teams to embed modern slavery in decision-making processes and fostering a culture of continuous improvement where gaps and opportunities are identified and addressed.</li> </ul>
Complaints and grievances	<ul style="list-style-type: none"> <li>Monitoring of any modern slavery related complaints or grievances received through our whistleblower mechanism and other channels as they arise.</li> </ul>
Due diligence	<ul style="list-style-type: none"> <li>Continuing to ensure targeted due diligence is undertaken across our Tier 1 supplier group and other higher-risk suppliers through ongoing engagement and evaluation of supply chain visibility.</li> </ul>

### Modern Slavery Act Reporting Criteria

This Modern Slavery Statement was prepared to comply with the mandatory reporting criteria outlined in *the Modern Slavery Act 2018 (Cth)*. The table below identifies where each mandatory criterion of the Act is disclosed within this Statement.

Legislative Reference	Mandatory Criteria	Page No.
Section 16 (1)(a)	<ul style="list-style-type: none"> <li>Identify the reporting entity.</li> </ul>	1, 2
Section 16 (1)(b)	<ul style="list-style-type: none"> <li>Describe the reporting entity's structure, operations and supply chains.</li> </ul>	6, 7, 8
Section 16 (1)(c)	<ul style="list-style-type: none"> <li>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns.</li> </ul>	9
Section 16 (1)(d)	<ul style="list-style-type: none"> <li>Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes.</li> </ul>	9, 10
Section 16 (1)(e)	<ul style="list-style-type: none"> <li>Describe how the reporting entity assesses the effectiveness of these actions.</li> </ul>	13
Section 16 (1)(f)	<ul style="list-style-type: none"> <li>Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).</li> </ul>	2
Section 16 (1)(g)	<ul style="list-style-type: none"> <li>Provide any other relevant information.</li> </ul>	2, 5

### Approval of this statement

This statement has been approved by the board of QCoal Pty Ltd which is the principal governing body for the reporting entities named in this statement for the purposes of the *Modern Slavery Act 2018 (Cth)*.

## Corporate Directory

### Country of incorporation and domicile

Australia

### Business address

Level 15, 40 Creek Street  
Brisbane, Queensland 4000  
Australia

Telephone: +61 7 3002 2900

We are open to receiving input on how we can further enhance our strategies in this domain. Feel free to share your feedback by sending an email to [info@qcoal.com.au](mailto:info@qcoal.com.au)



For more information, visit  
[www.qcoal.com.au](http://www.qcoal.com.au)



QCOAL GROUP