

# Modern Slavery Statement

**Jellinbah Group Pty Ltd – June 2024**



## Introduction

This statement covers the activities of Jellinbah Group Pty Ltd (ABN 54 010 754 793) (**Jellinbah**) and its owned and controlled entities during the financial year ended 30 June 2024.

This is Jellinbah's annual statement under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and sets out the actions it has taken to assess and address modern slavery risks in its operations and supply chains.

## 2023/24 Modern Slavery Breaches

During the reporting period, Jellinbah did not become aware of any breaches by it, or by its supply chain, of either the provisions or spirit of the Modern Slavery Act. No potential breaches were brought to the attention of Jellinbah by its employees, service providers or suppliers.

An independent screening of new suppliers did not return any negative results.

## About us

At Jellinbah, we recognise that respecting the human rights of those affected by our business activities is essential and reflects the "Jellinbah Way" in terms of what matters to us and how we behave.

Jellinbah is a company incorporated in Australia and our registered office is located at Level 20, 66 Eagle Street, Brisbane City Queensland 4000.

Jellinbah has a number of subsidiary entities in its corporate group: Lake Vermont Resources Pty Ltd (ABN 28 114 286 841), QCMM (Lake Vermont Holdings) Pty Ltd (ABN 22 114 286 878), Lake Vermont Marketing Pty Ltd (ABN 30 114 286 850), QCMM Finance Pty Ltd (ABN 79 059 230 992), Tremell Pty. Ltd. (ABN 86 010 949 774), Jellinbah Mining Pty Ltd (ABN 63 052 251 000), Jellinbah Resources Pty Ltd (ABN 60 010 825 215), Bowen Basin Coal Pty. Ltd. (ABN 22 065 321 440) and JG Land Company Pty Ltd (ABN 20 114 286 869).

Established in 1988, Jellinbah is a privately owned independent Queensland based coal company, with operations in Central Queensland's Bowen Basin. The group has two operating mines, Jellinbah East Mine and Lake Vermont Mine, with a combined production capacity of 14 million tonnes per year. The mines produce metallurgical coals, which is all exported to be used in the steel making process. The head office for the business is in Brisbane.

As at 30 June 2024, Jellinbah directly employed 536 employees. Jellinbah also uses contract labour.

## Our supply chain

Jellinbah works with many suppliers that source mining equipment and goods from a number of countries. Its suppliers are all located in Australia. However, they import mining equipment and consumables from overseas, including Japan, the USA, China, and Europe. Jellinbah does not directly source goods from overseas.

Jellinbah's business model is to contract directly with Australian based entities and source from the Australian market if possible. As a result, the majority of its service providers are covered by Australian industrial relations legislation, which, overall, reduces the risk of employee underpayments.

## Modern slavery risks

Jellinbah 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 its operations and supply chains.

During this reporting period we continued to focus on identifying any risks present in our major supply categories.

Jellinbah is continuing to develop our understanding of the modern slavery risks across our supply chain.

### Risk assessment

Jellinbah's exposure to modern slavery risks is assessed each six months in conjunction with its half-yearly review of all corporate level risks.

Jellinbah has developed a risk assessment methodology, which considers a number of indicators of modern slavery risks, including sector and industry, the type of products and services, geographical location and specific entity risk.

The most recent assessment indicated that Jellinbah'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

Risk	Description of risk
Sector / Industry level risk	The mining industry in Australia is generally considered a low risk because its industrial environment is highly regulated and monitored by independent parties. There is, however, a presence of labour-hire employment arrangements, which have potential to conceal risks and might reduce employment certainty. All wage-based workers at both mine sites are engaged under enterprise agreements, approved by the Fair Work Commission.
Product / Service risk	Some services procured (for example, minor maintenance; office cleaning; freight delivery; international cargo ship charter) pose an elevated risk, due to the prevalence of unskilled workers.  Some products procured (for example, explosives, safety supplies and electrical supplies) pose an elevated risk, due to cost pressures and delivery timeframes, which may force suppliers to impose excessive working hours and low wages. We are also conscious that some of our products may be developed in countries where there is a risk of labour exploitation (see below).
Geographic risk	Every country has modern slavery risks. Some products used may originate from countries where there is a higher risk of labour exploitation. We are continuing to improve the traceability of goods and services in our supply chain, with a focus on countries with an elevated risk, due to the increased slavery risks there.
Specific Entity risk	We are not aware of any suppliers in our supply chain with modern slavery practices. However, we are continuing to engage with our suppliers to maintain confidence in their supply chain and to ensure that they understand Jellinbah's policies and expectations.

## 2024 Actions to assess and address risk

During the reporting period, Jellinbah addressed the risk of modern slavery in its operations and supply chains in a number of ways.

We continue to subscribe to an international Compliance Catalyst database (Compliance Database) to use as an independent screening tool for Modern Slavery risk in our supply chain. We conducted

searches of our new suppliers for Modern Slavery/Human Rights/Business Crimes. No negative results were returned.

We invested in an expert, external training provider (SafeTrac) to provide a range of training to our workforce, including in relation to modern slavery. During the reporting period, Jellinbah rolled out specific modern slavery training to our workers involved in procurement decisions.

During this reporting period, we also engaged KPMG to provide a 24/7, independently monitored whistleblower hotline. FairCall enables employees or other whistleblowers to make disclosures anonymously, should they wish to do so, including in relation to modern slavery issues. No reports were received for modern slavery in this reporting period.

## **Assessing our effectiveness**

We are committed to reviewing our processes to ensure we are appropriately identifying and evaluating our modern slavery risks. This review is led by our senior management, including our General Counsel and Chief Financial Officer.

To facilitate this commitment, the Modern Slavery Compliance Working Group (which contains representatives from legal, mining operations and business operations) continues to meet regularly to identify and manage modern slavery risks.

As part of monitoring the effectiveness of our current systems, we review:

- our Modern Slavery Policy to ensure it is up to date;
- geographic and industry trends, in consultation with our supply chain partners, to identify 'hot spots' with a high risk of modern slavery practices;
- our training content to ensure it is up to date with both the legislation and our own internal processes; and
- our supply chain contracts to ensure modern slavery provisions are included.

We have also monitored our performance against a number of key performance indicators including:

- the percentage of workers who have completed training addressing modern slavery; and
- the proportion and number of complaints (if any) resolved by our grievance procedures and our whistleblower hotline, FairCall which relate to modern slavery.

## **2025 Focus**

For the 24/25 Reporting Period our focus will be the management of the risk modern slavery as it relates to shipping.

We will:

- review our standard voyage charter for compliance with the Maritime Labour Convention
- put our relevant logistics personnel through a training course which will outline red flag indicators on the standard Q88 Dry Questionnaire which the chartering team will need to review before accepting a Vessel

The main focus for the 24/25 reporting period will be to continue to risk assess our supply chain for modern slavery risks and to continue to monitor the implementation of our current initiatives, including the SafeTrac modern slavery training module and FairCall, to ensure their effectiveness over the long term.

It is the intention to continually review these processes to identify and implement improvements, recognising that such actions will never truly be 'finished', but will need constant evolution to respond to changing environments.

## Supporting Policies and procedures

Jellinbah has in place a number of policies and procedures to serve as a strong governance foundation, upon which to base a framework for addressing Modern Slavery risks including:

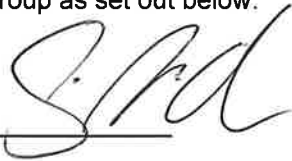
- The Jellinbah Way – Our Code of Conduct: This makes it clear that Jellinbah is committed to do business in a way that earns respect for our business within our communities and that we are appreciative and supportive of the communities in which our business operates. This includes doing everything we can to avoid modern slavery risk in our supply chain.
- Grievance procedures: The business has in place mechanisms for employees and contractors to raise concerns, without fear that their future employment prospects will be adversely affected.
- Jellinbah's contracting and procurement standards include ethical business practices, to ensure that decisions are not just based on supply costs.
- Whistleblower Policy: This policy provides a framework for the reporting (including anonymous reporting via FairCall) of fraudulent, corrupt, unethical or other unacceptable behaviour.

## Consultation

This statement has been prepared by the Modern Slavery Compliance Working Group, in consultation with appropriate executives and the Chief Executive Officer of Jellinbah.

This statement was approved by the Board of Jellinbah Group and signed by the Chief Executive Officer of the Jellinbah Group as set out below.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

17/4/25

Craig McCabe, Chief Executive Officer – Jellinbah Group Pty Limited