

Bravus Mining & Resources

Modern Slavery Statement

Reporting year ended 31st March 2024

1. Introduction

This Modern Slavery statement is for Adani Mining Pty Ltd ACN 145 455 205, trading as Bravus Mining & Resources (**Bravus Mining & Resources**), which is a reporting entity under the *Modern Slavery Act 2018* (Cth) (the “**Act**”).

Bravus Mining & Resources is an Australian business and part of the global **Adani Group**. Both Bravus Mining & Resources and the Adani Group are committed to combating the risk of modern slavery in our supply chains and in any part of our business.

As one of the goals of the Adani Group is to act with integrity, we strive to act fairly, ethically, and openly in everything that we do. Bravus Mining & Resources is committed to:

- operating its business in accordance with the Act;
- ensuring our people understand modern slavery and the risk it presents to our operations;
- providing our people with appropriate avenues for reporting potential instances of modern slavery within our operations, or the operations of our suppliers and/or clients;
- mitigating modern slavery risk within our operations;
- eliminating potential and/or actual modern slavery practices from our operations and supply chain;
- ensuring appropriate transparency with our people, clients, suppliers, and stakeholders regarding the maturity of our modern slavery due diligence process and the findings arising from this; and
- enhancing our plan for measuring the effectiveness of our existing modern slavery risk framework.

This Modern Slavery statement is prepared in accordance with the Act and describes the risks of modern slavery within the Bravus Mining & Resources business. It outlines the steps we have taken, and the next steps to be completed during the financial year (ended 31 March 2023) to identify, manage and mitigate the risks in our operations and supply chains.

For the purposes of this Modern Slavery statement, references to ‘**we**’, ‘**us**’ and ‘**our**’ collectively refer to Bravus Mining & Resources and its reporting entity covered by the statement.

2. Modern Slavery Law

The Act identifies seven (7) relevant mandatory criteria (**Mandatory Reporting Criteria**) that the Bravus Mining & Resources’ Modern Slavery statement must address, each of which are considered in turn below, as follows:

- 1) identify the reporting entity;
- 2) describe the reporting entity’s structure, operations and supply chains;
- 3) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity;
- 4) describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes;
- 5) describe how the reporting entity assesses the effectiveness of these actions;
- 6) describe the process of consultation with any entities that the reporting entity owns or controls; and
- 7) any other information the reporting entity considers relevant.

3. Mandatory Reporting Criteria

3.1. Identity of reporting entity

This is the Modern Slavery statement for Adani Mining Pty Ltd ACN 145 455 205 trading as Bravus Mining & Resources, an Australian proprietary company, registered in Queensland, and with its registered office at Level 9, 120 Edward Street, Brisbane Queensland 4000.

3.2. Describe the reporting entity's structure, operations, and supply chains

Structure

Bravus Mining & Resources is wholly owned by Adani Global Pte Ltd (a proprietary company registered in Singapore) and is part of the **Adani Group** of diversified Australian businesses (known as “**Bravus**”) delivering integrated energy and infrastructure services. Bravus has been in Australia for more than a decade, bringing investment, new ways of operating, and working with communities since 2010.

Operations

Bravus Mining & Resources supports the reliable and affordable energy mix of the future by producing and transporting high-quality Australian coal for export to nations around the world that want to lift their people out of energy poverty.

Bravus Mining & Resources operates the Carmichael mine, which is an open-cut thermal coal mine in the Galilee Basin (the “**Carmichael Mine**”). The nearest town is Clermont, about 160km away, and the Carmichael Mine is more than 300km inland from the Queensland coast.

The Carmichael Mine produces in the order of 10 million tonnes of coal each year for the export market. It is one of more than 100 coal mines in Australia.

Bravus Mining & Resources adheres to strict environmental approvals for its operations across regional Queensland. These approvals require us to monitor and manage groundwater and water systems, maintain management plans for specific species, and conduct environmental research.

Bravus Mining & Resources is proudly local, supporting regional communities and businesses to grow sustainably. We have a focus on local jobs and procurement, ensuring we make a positive contribution to the communities in which we operate, and we work in partnership with Traditional Owners to ensure we respect the rights, history, future intentions, and requests of First Australians.

Supply chains

We are a mining company with employees and contractors living across Queensland but operating from our bases in Brisbane, Rockhampton, Townville, and at the Carmichael Mine. We facilitate the mining of minerals essential to human progress and development, and by doing so efficiently and effectively, we aim to deliver superior returns to our shareholders while safeguarding the environment and meeting our wider obligations to society.

Our website (www.bravusmining.com.au) provides more detailed information about our business, including our strategy, philosophy, and operations, as well as our approach to sustainability. Bravus Mining & Resources engages with approximately 655 suppliers primarily located within Australia. Our commercial and legal teams support operations in managing our suppliers.

Bravus Mining & Resources continues to enhance its processes aimed at ensuring that we only work with appropriate suppliers who can meet the standards that we expect. Most of our direct, large-value suppliers are Australian entities.

As part of our commitment to local procurement, where needed, we provide prospective suppliers with technical support to help them meet our procurement standards.

3.3. Risks of modern slavery practices in the operations and supply chains of the reporting entity

Given the majority of our suppliers operate within Australia, the geographical risk is assessed as low regarding modern slavery. Risk-based frameworks are still being considered as additional tools to identify and review high-risk supply chains and ensure suppliers are acting in line with Bravus Mining & Resources expectations.

3.4. Actions taken by the reporting entity to assess and address the above risks, including due diligence and remediation process

Supply chain due diligence

Bravus Mining & Resources' primary suppliers are subject to contract reviews (monthly) and executive steering-committee meetings (monthly), which provide an opportunity to raise modern slavery awareness and discuss the risks associated with it.

Additionally, Bravus Mining & Resources has a '*Supplier Modern Slavery Questionnaire*.' The Supplier Modern Slavery Questionnaire ensures that all our major business partners and supply chain stakeholders are aware of their own responsibilities and those of Bravus Mining & Resources regarding managing the risk of modern slavery in the supply chain and to elicit information that Bravus Mining & Resources will use to ensure compliance and assess modern slavery risks in its supply chain.

The commercial team review the responses to the Supplier Modern Slavery Questionnaire to ensure we understand our exposure and mitigate the risks of modern slavery in our supply chain.

Modern slavery awareness reference guide

Bravus Mining & Resources is committed to ensuring that our people and suppliers understand what modern slavery is, and the key role they play in delivering on our commitments.

To support the education of our employees, a reference guide was created to provide an overview of local and global modern slavery trends in related industries and the types of risks our business should consider. The reference guide also provides a view of the legislation applicable to Bravus Mining & Resources, how we deliver on our commitment to the underlying principles, and the key commitments in our reporting.

Supply chain management and supplier on-boarding processes

Bravus Mining & Resources has an annual review of its '*Standard Purchase Contract*' and '*Standard Service*

Contract (General Terms and Conditions) with an ongoing commitment to refining our precedent agreements in relation to our modern slavery compliance obligations for our direct suppliers and sub-suppliers. This review, while something that will always be evolving, has progressed, and the standard suite contracts now include modern slavery compliance clauses that obligate the counterparty to take reasonable actions and measures to identify, assess and address the risk of modern slavery practices in the operation's supply chains used in connection with goods or services the subject of the contract.

If the supplier or contractor becomes aware of any such practices, that party must take all reasonable action to address or remove these practices, including where relevant, by addressing any practices of other entities in its supply chains.

Remediation, grievances, and complaints

Bravus Mining & Resources has a '*Whistleblowing Policy*' in place with the reporting route available for both internal and external reports to raise concerns about compliance obligations, corporate governance, bullying and harassment, including any complaint or concern regarding our modern slavery obligations.

The Board and senior management of Bravus Mining & Resources encourage everyone who works with Bravus Mining & Resources to speak up and report any conduct they believe to be inappropriate. We are committed to ensuring that individuals who disclose can do so safely, securely and with confidence that they will be protected and supported.

Our dedicated '*Whistleblowing Hotline*' is one of those formal channels. This service is available to any individual who is, or has been a director, employee, secondee, contractor, consultant, supplier, the service provider (or their employee or subcontractor), associates of Bravus Mining & Resources and relatives, spouses, dependents of these individuals.

The Whistleblowing Policy is regularly reviewed and updated to ensure an effective and transparent grievance process and compliance with relevant laws.

Policies and guidelines

Bravus Mining & Resources takes guidance from the Adani Group policies and code of conduct (the "**Guidelines**"). The Guidelines require the entities and its people to conduct business in a manner that respects human rights, for employees and contractors treat each other with dignity, respect, and consideration at all times, and to not engage in modern slavery practices.

All procurement engagements for the business are required to demonstrate that the spending of the company funds is justified, is done so in accordance with the Guidelines, achieves the best value and is fit for purpose.

The Guidelines also prohibit discrimination based on any protected attribute under law. Our employees and contractors must understand and adhere to the Guidelines throughout their employment or engagement.

The objective of the Guidelines is to ensure that the procurement of all goods and services is conducted in an honest, competitive, full, fair, reasonable, transparent, and ethical manner.

3.5. How the reporting entity assesses the effectiveness of the above actions

To date, Bravus Mining & Resources has not become aware of any occurrences where a supplier has engaged in practices in breach of their modern slavery obligations, and therefore assessment of effectiveness can be challenging.

Notwithstanding the above, we recognise that the assessment of our actions to identify and address our modern slavery risks is an ongoing process and accordingly. Bravus Mining & Resources continues to assess the effectiveness of actions taken by us and our suppliers to respond to modern slavery risks with respect to supply chains and operations, and in doing so, we conduct reviews on the following areas:

- Procurement and supply chain:
 - percentage of contracts which include modern slavery clauses;
 - percentage of major suppliers completing the modern slavery questionnaire.
- Grievances and reporting:
 - number of modern slavery cases identified and remediated.
- Bravus Mining & Resources' obligations to ensure that modern slavery processes are being complied with.

Further to the above, Bravus Mining & Resources undertakes a continual process of improving the way it distributes information and implements training to key staff involved in the procurement and engagement of contractors, consultants, and suppliers, in order to ensure such staff are aware of the measures that are currently in place, and those that are to be implemented.

3.6. The process of consultation with any entities that the reporting entity owns or controls

Bravus Mining & Resources consulted with the key leadership team members in preparing this Modern Slavery Statement and circulated a draft of this statement for review and comment, prior to it being put to the Board of Directors for final review and approval.

3.7. Any other relevant information

Bravus Mining & Resources continues implementing an improved framework to assess and monitor the Modern Slavery Risks in our operations and supply chain.

Bravus Mining & Resources recognises that the risks of modern slavery are complex and evolving. We will continue to work to identify and address these risks in our business and engage with a range of stakeholders to assess the effectiveness of our actions and enhance our approach.

4. Reporting Entity Board Approval

This Modern Slavery statement was approved by the Board of Directors on 26 November 2024.

5. Reporting Entity Signature of Responsible Member

A handwritten signature in black ink, appearing to read 'S. Vora', with a horizontal line drawn through it.

Samir Vora
Director
Adani Mining Pty Ltd