

Byerwen Group Modern Slavery Statement 2025



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Scope

As an Australian business generating annual consolidated revenue in excess of \$100 million, Byerwen Coal Pty Ltd 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 'Act'). All references to 'Byerwen', 'Byerwen Group', 'the Company', 'the Group', 'we', 'us' and 'our' refer to Byerwen Coal Pty Ltd (ABN 64 133 357 632) and the entities it controls, unless otherwise stated.

Reporting Entities

This Modern Slavery Statement ('Statement') has been prepared for the compliance period 1 July 2024 to 30 June 2025 and is a single statement made under section 13 of the Modern Slavery Act on behalf of the following entities that qualify as reporting entities under the Act (i.e. minimum annual revenue of \$100 million):

- **Byerwen Coal Pty Ltd** (ABN 64 133 357 632)

This Statement sets out the actions Byerwen Coal Pty Ltd and its subsidiary reporting entities (collectively 'Byerwen Group' or 'the Group') have taken to identify, assess and mitigate any actual or potential modern slavery risks in Byerwen Group's operations and supply chains for the 12 months ended on 30 June 2025.

Consultation with Subsidiaries

Byerwen Group is affiliated with the QCoal Group and operates under QCoal Group policies and procedures. All QCoal Group subsidiaries and related entities operate under common policies and processes, 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 Byerwen Group activities.

This FY25 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 Byerwen Group and 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 3 December 2025 by the board of Byerwen Coal 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

Byerwen 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 Byerwen.

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.



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

Managing Director's Message



On behalf of Byerwen Group, I am pleased to present our FY25 Modern Slavery Statement which outlines our actions to identify, assess and mitigate modern slavery risks within our operations and supply chain.

The mining sector operates within complex global supply chains and we understand that transparency and due diligence are critical to maintaining ethical procurement practices. Over the past year, the Group has continued to strengthen its governance framework through the review of key policies, refinement of supplier engagement processes and the implementation of technology solutions to assess modern slavery risks.

We acknowledge that addressing modern slavery is an evolving process that requires continuous improvement. As part of our commitment, the Group will continue to enhance its risk assessment tools, explore opportunities for broader staff training and review the effectiveness of our actions to ensure we continue to achieve meaningful progress on reducing supply chain risks.

Our approach reflects our broader Group values of integrity, trust and pragmatism. We remain committed to conducting our business ethically, supporting safe and fair working conditions, and contributing positively to the communities in which we operate.

I thank our employees, suppliers and partners for their continued commitment to these principles and for their role in helping us strengthen our approach to modern slavery and responsible business conduct.

Christopher Wallin
Managing Director

About us

As part of the QCoal Group, Byerwen Coal is a proudly independent Queensland-based company

Business Overview

Byerwen Coal Pty Ltd is a company limited by shares, incorporated in Australia, whose shares are privately held. The consolidated entity's principal activities are coal mining, handling and processing on the Byerwen Mine site.

Byerwen Mine is an open-cut mining operation producing both metallurgical coal and by-product thermal coal. The Byerwen Mine is situated west of Glenden in the Bowen Basin region of Queensland.

Vision

To be a leading independent Australian coal supplier, contributing to steel production for the energy transition and supporting electricity generation to meet global energy needs.

Objective

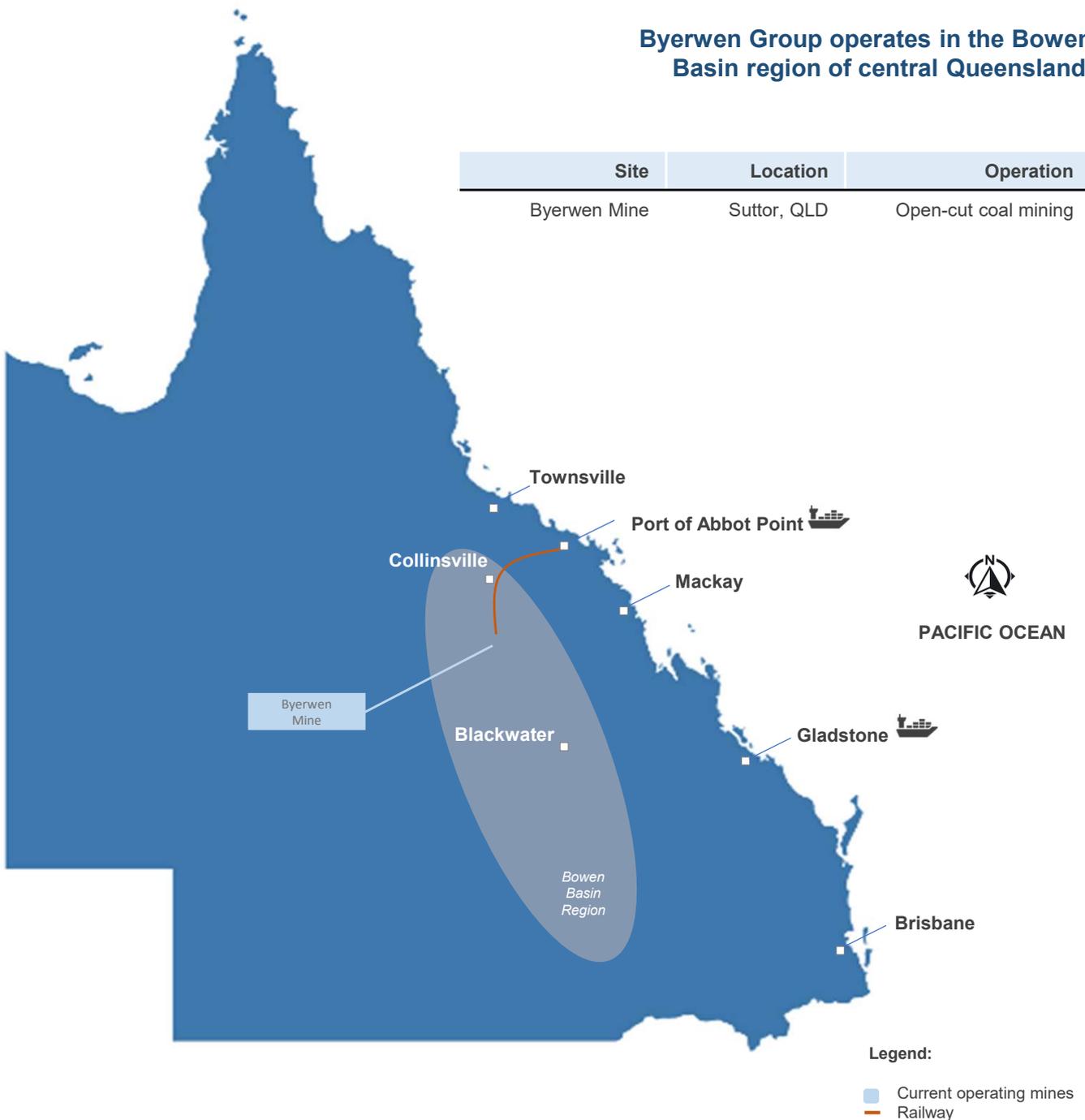
To operate safely, responsibly and efficiently to deliver the coal products required for global steelmaking and electricity generation, while managing our environmental and social impacts.



1 Structure, Operations and Supply Chain

Byerwen Group operates in the Bowen Basin region of central Queensland.

Site	Location	Operation
Byerwen Mine	Suttor, QLD	Open-cut coal mining



Byerwen Mine is a contract mining operation. The majority of Byerwen's coking coal and by-product thermal coal is exported to foreign markets in Asia, Europe and the Middle East. Over 86 per cent of Byerwen's sales in FY25 (by tonnage) were to the Asian region.

In FY25, the Byerwen Mine exported 3.4 Mt of coking and thermal coal from its operations. This excludes coal exported from QCoal Group mines during the year¹ (please refer to the *QCoal Group Modern Slavery Statement* for further details).

The entire Byerwen workforce and operations are located in Queensland, Australia with the majority located in Brisbane. Byerwen employs certain key management positions through a related party entity and indirectly employs over 800 workers through its key contractors at the Byerwen Mine.

Byerwen Group's corporate head office is located in Brisbane.

The core activities within our operations include coal mining, handling and processing on the Byerwen Mine site.

¹ QCoal Group mines are reported separately for Modern Slavery reporting purposes under the Act.

Key projects

Byerwen Mine

The Byerwen Mine is an open-cut mining operation located in the northern Bowen Basin, approximately 20 kilometres west of Glenden. The mine is situated along the State-controlled Collinsville-Elphinstone Road and the Newlands rail system, which connects to the Port of Abbot Point.

The Byerwen Mine is permitted to extract up to 15 million tonnes per annum ('Mtpa') of run-of-mine ('ROM') coal to produce approximately 10 Mtpa of combined metallurgical and thermal coal products for the export market.

QCoal has a proud partnership with JFE Steel Corporation (part of the JFE Group), Japan's second-largest steel mill. JFE first invested in Byerwen Mine in 2009 when the project was a greenfield site. This mutually beneficial investment has enabled JFE to secure a stable supply of high-quality coking coal for its steel plants and as well as enabling the ongoing development and productivity of the Byerwen mine.



Location	West of Mackay, Bowen Basin, Queensland
Method	Open-cut
Product	Hard coking coal
Traditional Owners	Jangga People and Birriah People
First coal	2018



10 million tonnes

Production capability per year

800 jobs

Workforce consisting of employees and contractors at peak capacity

1 Structure, Operations and Supply Chain

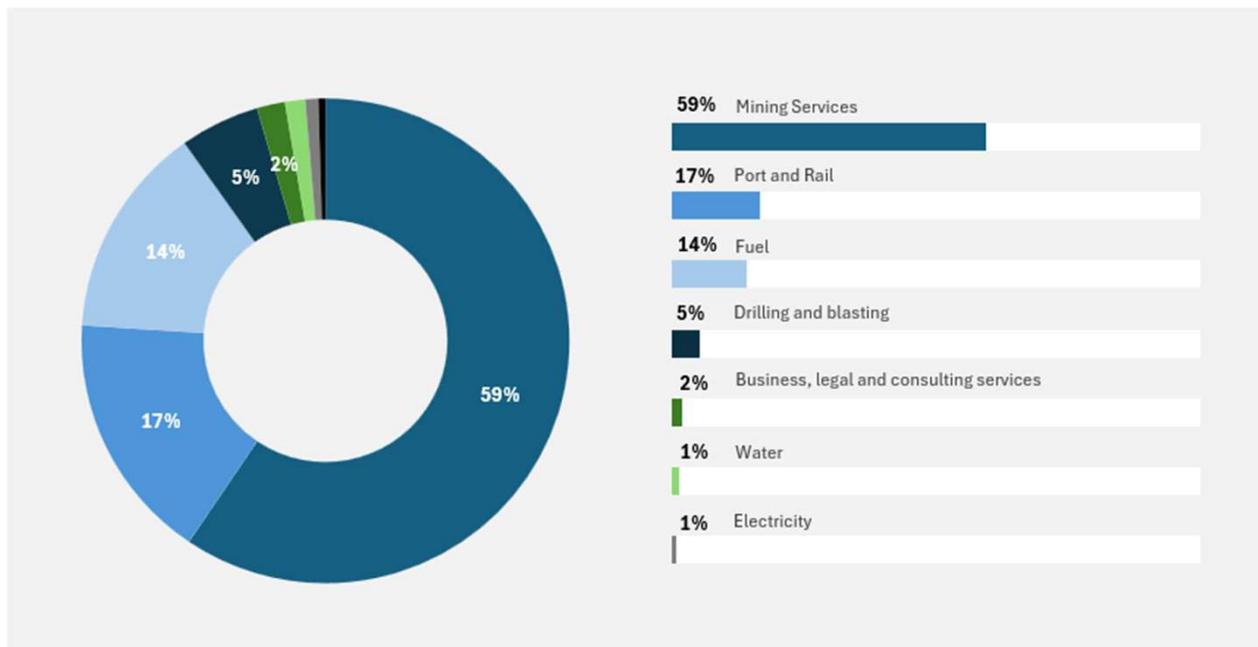
During FY25, the Byerwen Group continued to operate within its core activities spanning exploration, drilling, mining services, associated logistics and business support functions. The Group's head office and principal management functions are located in Brisbane, Queensland.

Procurement across the Byerwen Group is managed through a centralised procurement function within the Brisbane head office, which is responsible for procurement governance, contract administration, supplier engagement and payment processing. This central structure ensures consistent application of procurement standards and oversight across all business units.

In FY25, Byerwen maintained oversight of approximately 130 active suppliers, representing a broad range of goods and services across exploration, drilling, mining services, equipment supply, logistics and corporate support. Byerwen's expenditure continues to be concentrated with a small number of large Australian-based contractors and suppliers that operate under established corporate governance frameworks and documented procurement and labour practices.

While Byerwen periodically reviews its supplier base to confirm the nature and location of key suppliers, no material changes to the Group's supply chain structure or operating model occurred during the reporting period. Accordingly, the Group considers that the nature and level of modern slavery risk exposure within its operations and supply chains remains substantially consistent with that identified in the prior reporting period.

Summary of percentage spend by procurement category ^{1 2}



Procurement categories

Mining Services consists of expenditure related to contract mining, drilling and blasting services.

Business, legal and consulting includes expenditure on professional advisory services such as geological, engineering, environmental, legal and other technical advisory support.

Port and rail comprises expenditure related to the transportation of coal including rail haulage, port operations and associated logistics services.

Fuel includes expenditure on the supply and delivery of diesel used in mining equipment, machinery and vehicles to support mine operations.

Equipment and maintenance includes expenditure on the servicing and repair of mining machinery, vehicles and other ancillary equipment.

Drilling and blasting covers contract drilling, explosives supply and handling, blasting design and technical support.

Electricity includes supply and delivery of electrical power to support mining operations and associated infrastructure.

¹ Excludes government, tax and other regulatory payments.

² Excludes intercompany payments between Byerwen Group entities and other related parties.

2 Risks of Modern Slavery

Risks in Operations

During FY25, all mining operations of the Group were conducted in Queensland, Australia. The Group has assessed that the risk of modern slavery within its direct operations is low.

Labour and Human Resources

All employees of Byerwen are engaged via a related party QCoal Group entity on terms and conditions that comply with Australian employment law, including minimum wage, working hours, leave entitlements, and workplace health and safety requirements. Employees are able to join and be represented by unions.

Byerwen maintains human resources controls (as part of QCoal Group's policy) to mitigate labour-related risks, including formal recruitment and onboarding procedures. Where external recruitment partners are used, the Group engages long-term providers and ensures that all necessary background checks and compliance requirements are completed before employment. Policies and procedures are reviewed periodically to ensure they remain effective in managing risks and complying with employment and human rights requirements.

Contractor Workforce

Byerwen engages contractors to support operational mining requirements, including site labour, technical services and specialised equipment operation. The majority of contractors are engaged through our established mining contractor partners, with whom we maintain formal contractual arrangements. These arrangements include requirements for compliance with applicable employment and labour laws, workplace health and safety standards, and other relevant policies to ensure that contractor personnel are managed consistently with the Group's operational and human rights standards.

Sea Freight and Shipping

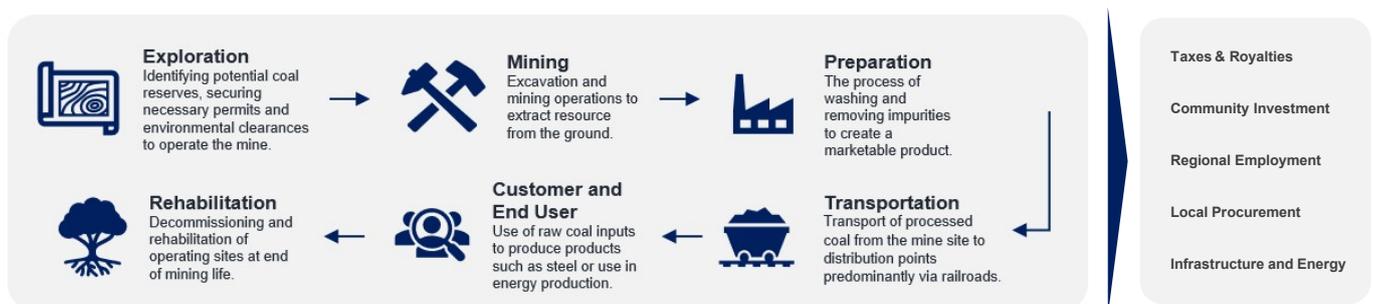
Byerwen's coal is exported via sea freight, an industry where there are recognised inherent risks of modern slavery. While the Group does not directly procure shipping services (and is therefore not directly exposed to modern slavery risks within the shipping industry), we engage with external parties that coordinate with shipping providers on behalf of our customers for the export of coal.

Grievance Mechanisms

Byerwen also provides a grievance mechanism and reporting channel through its Whistleblowing Policy to allow employees, contractors and other workers to raise concerns about workplace practices or potential breaches of labour standards.

Byerwen's Mine to Market Lifecycle

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



2 Risks of Modern Slavery

Risks in Supply Chains

Byerwen's suppliers and contract mining providers operate across a range of sectors. Some of these sectors are considered high-risk for modern slavery and human trafficking, based on findings from the *Global Estimates of Modern Slavery and Child Labour: Global Estimates 2020, Trends and the Road Forward (ILO and UNICEF, 2021)*.

Byerwen's supply chain encompasses a wide range of goods and services that are critical to the ongoing operations of the business. These include mining contractor services, specialised equipment and machinery, equipment maintenance and repair services, fuel and energy supply, logistics, and other operational requirements. Mining contractor arrangements form a significant portion of the Group's supply chain expenditure and are essential to maintaining operational continuity and efficiency. Contractors provide both skilled and semi-skilled labour, technical expertise, and support services that enable the safe and effective extraction and processing of coal.

While Byerwen's mining operations are conducted entirely in Queensland, Australia, where labour regulations, workplace health and safety standards, and human rights protections are generally robust, we recognise that the broader supply chain is exposed to varying levels of risk for modern slavery. These risks are influenced by factors including the geographic location of suppliers, the sector or industry in which they operate, the type of labour used, and the complexity of their own supply chains.

Image 1 illustrates the high-risk sectors associated with the Group's suppliers and contractors, showing the number of suppliers operating, producing, or sourcing within each identified sector¹.

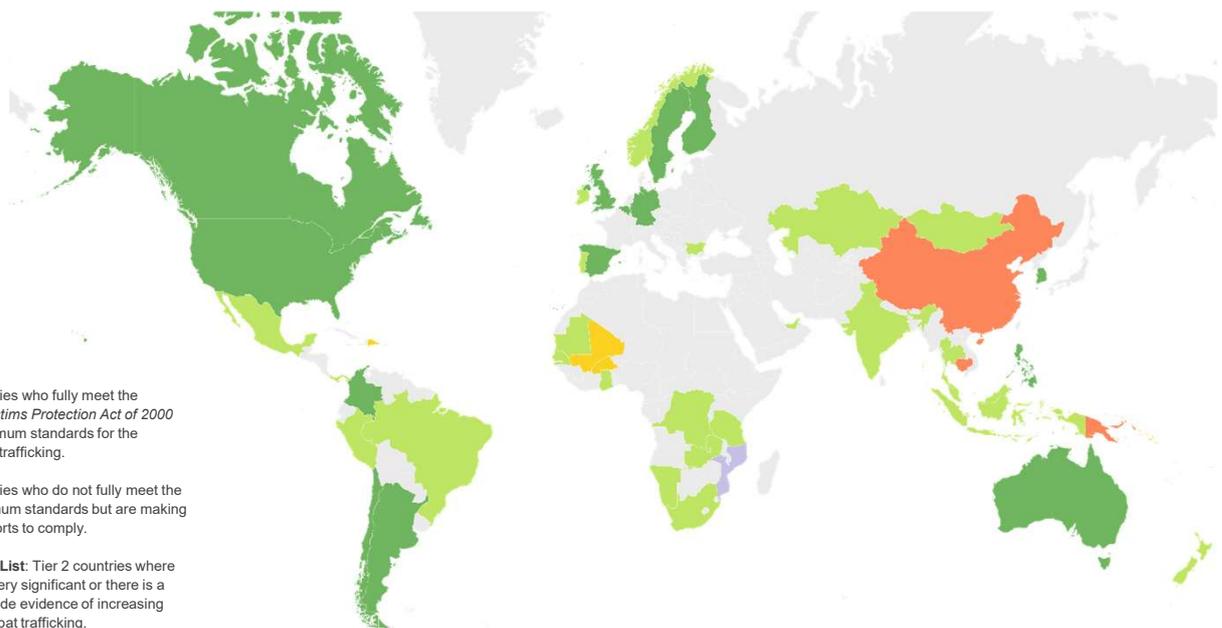


Image 1: High-risk sectors

¹ QCoal Group and Byerwen Group supplier assessments are conducted as a combined questionnaire.

Geographical Risk

Some countries or regions where our suppliers operate can be described as high-risk due to the possibility of a link to human trafficking. The geographical regions where our supply chain partners operate are shown in the map below.

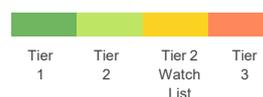


Tier 1: Countries who fully meet the *Trafficking Victims Protection Act of 2000* ('TVPA') minimum standards for the elimination of trafficking.

Tier 2: Countries who do not fully meet the TVPA's minimum standards but are making significant efforts to comply.

Tier 2 Watch List: Tier 2 countries where trafficking is very significant or there is a failure to provide evidence of increasing efforts to combat trafficking.

Tier 3: Countries who do not fully meet the TVPA's minimum standards and are not making significant efforts to do so.



3 Assessing and Addressing Modern Slavery Risks

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

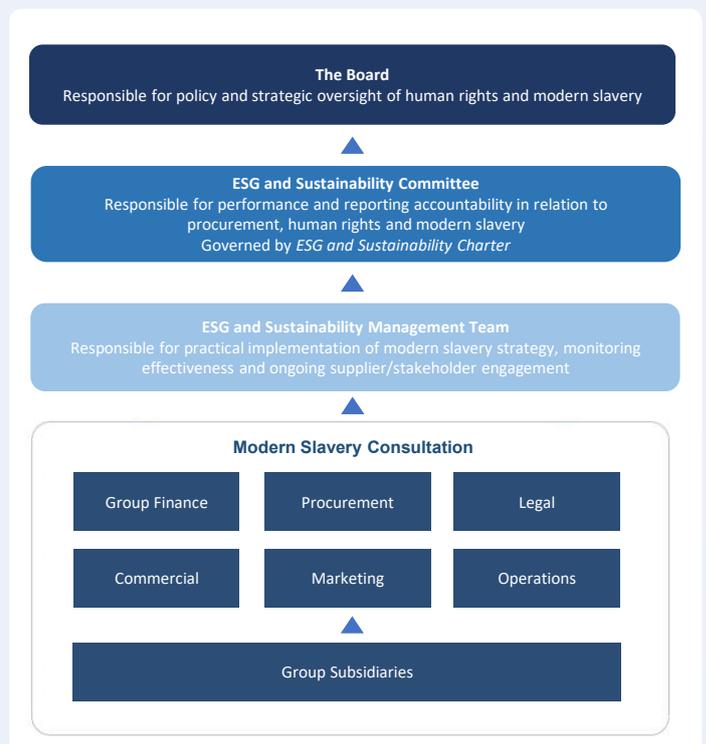
Strong sustainability governance plays a critical role in ensuring all human rights and modern slavery risks are appropriately identified and addressed throughout our operations and supply chains.

Byerwen leverages the shared governance and policy framework of the QCoal Group. 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 has 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.

The Group'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 Byerwen 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

Key Achievements

During the reporting period, Byerwen made significant progress in strengthening its approach to identifying, assessing and addressing modern slavery risks across our operations and supply chain. Key achievements included:

Achievement	Description
Implementation of a Modern Slavery Assessment Software Tool	We invested in a dedicated risk assessment tool to enhance the way we monitor and evaluate modern slavery risks, resulting in greater supplier engagement and strengthening our understanding of potential risk areas.
UN Guiding Principles on Business and Human Rights Gap Analysis	We undertook a comprehensive gap analysis to identify opportunities to improve our assessment and management of modern slavery risks in line with the UN Guiding Principles on Business and Human Rights.
Rollout of a Supplier Code of Conduct	We implemented a new Supplier Code of Conduct which outlines our expectations regarding ethical behaviour, human rights, and labour practices. The Code serves as a key mechanism for communicating our commitment to responsible sourcing and ethical business practices with our supply chain partners
Review of Contractual Terms and Clauses	We reviewed and updated modern slavery clauses and terms within a number of mining services contract arrangements to ensure they strengthen accountability within our supply chain.
Review of Modern Slavery Policy	We conducted a comprehensive review of our Group Modern Slavery Policy to ensure it remains current and effective in addressing the risks of modern slavery and human trafficking across our operations and supply chains.

Assessing Modern Slavery Risks

The Group used the iPRO Modern Slavery Assessment Tool in FY25 to assess and manage modern slavery risks within our supply chain. All risks identified in the previous section were determined using this tool. During the reporting period, we engaged iPRO to conduct a bulk assessment of 125 suppliers¹.

Participating suppliers completed an online self-assessment questionnaire and their responses were analysed to determine modern slavery risk scores and assign each supplier to one of five risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

Risk categorisation was based on two key scores. The Inherent Risk Score assessed risks associated with a supplier’s operations, production, and sourcing, considering factors such as geography, goods type, industry sector, and workforce. The Unmitigated Risk Score evaluated the adequacy of each supplier’s policies and procedures to manage these risks. Aggregated Inherent and Unmitigated Risk Scores were then calculated to provide an overall view of modern slavery risk across our supply chain.

Supplier Assessment Results FY25

In FY25, the completion rate for modern slavery risk assessments was 76%, representing a notable increase from the previous reporting period. This improvement reflects progress in implementing our new assessment processes and engaging more broadly with different areas of the business and our supply chain. The increased completion rate also provides us with a broader understanding of our modern slavery risk profile to help support more informed risk management actions.



¹ QCoal Group and Byerwen Group supplier assessments are conducted as a combined questionnaire.

3 Assessing and Addressing Modern Slavery Risks

Supplier Assessment Results FY25 (continued)

In FY25, supplier risk assessments were completed to evaluate both inherent and residual modern slavery risks across the supply base. Of the total respondents:

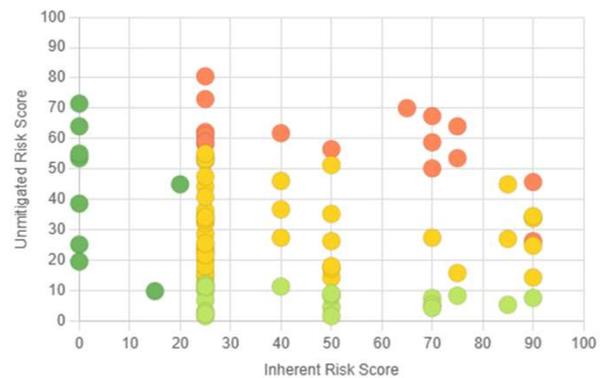
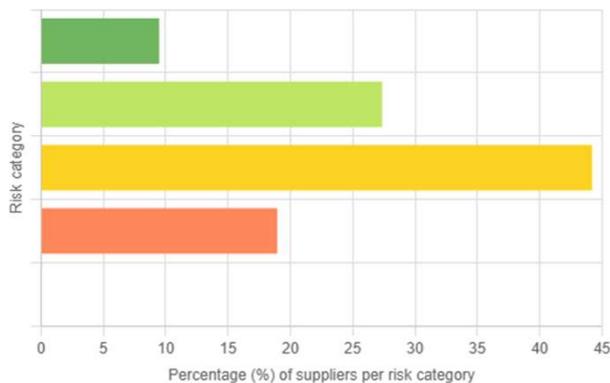
- 36.84% were classified as **Low-risk**, indicating no inherent risk or the presence of adequate risk controls.
- 44.21% were classified as **Medium-risk**, meaning partial risk controls are in place.
- 18.95% were classified as **High-risk**, with inadequate risk controls currently in place.

Across all suppliers, the average inherent risk score was 40.16 out of 100, reflecting the baseline level of risk based on supplier characteristics such as geography, industry and workforce profile, before risk controls are considered. After accounting for existing controls, the average unmitigated (residual) risk score was 31.73 out of 100, indicating that while controls have reduced risk exposure, there remains scope to further strengthen supplier risk management and due diligence processes.

Analysis of the FY25 supplier assessment results identified several recurring factors contributing to medium and high-risk scores. These factors indicate areas where suppliers may not yet have sufficient systems or controls in place to manage modern slavery risks effectively. Common themes included:

- Lack of formal modern slavery policies and procedures, resulting in limited governance or oversight of modern slavery risk management.
- Inadequate awareness and limited workforce training on identifying and addressing modern slavery indicators within operations or supply chains.
- Absence of structured risk assessment processes, meaning potential risks are not consistently identified, assessed or monitored.
- Limited organisational policies and procedures related to recruitment, worker verification, grievance mechanisms and remediation pathways, which are essential for preventing and responding to instances of exploitation.

Supplier risk category



- Low-Risk (No inherent risk)
- Low-Risk (Adequate risk control)
- Medium-Risk (Partial risk control)
- High-Risk (Inadequate risk control)
- High-Risk (High levels of inherent risk)

3 Assessing and Addressing Modern Slavery Risks

Addressing Modern Slavery Risks

To support ongoing efforts to address the risks of modern slavery in our supply chain, the Modern Slavery Assessment tool enables systematic assessment of supplier responses and provides tailored feedback to each participant based on their individual risk profile. Following completion of the assessment, suppliers receive a targeted action plan outlining practical steps to strengthen governance and risk mitigation in areas identified as requiring improvement.

Examples of action plan recommendations provided to suppliers from the FY25 assessment include:

- Developing and implementing modern slavery risk compliance policies;
- Providing annual awareness and training sessions to workers to improve understanding of modern slavery indicators;
- Updating contractual terms and conditions in supplier agreements to include modern slavery compliance requirements;
- Establishing risk identification and assessment processes to ensure ongoing monitoring; and
- Implementing or enhancing broader organisational policies, such as those related to recruitment, worker verification, grievance handling, and remediation.

By providing a structured and data-driven approach, the tool assists suppliers in prioritising actions and tracking progress over time, thereby contributing to a more consistent and effective management of modern slavery risks across the supply chain.

Awareness Training

The Group provides periodic training to key employees¹ to ensure awareness of modern slavery risks within our operations and supply chains. This targeted training supports our ability to identify and manage potential risks and ensures staff understand how to respond appropriately when issues arise. The sessions form part of the Group's broader program to build internal capability on ESG and sustainability matters, including modern slavery awareness, regulatory reporting obligations, human rights developments and their relevance to the mining industry.

The Group is currently exploring options to implement systematic online training modules in future to provide consistent and scalable training across all business areas.

Internal Policies and Procedures

The Group regularly reviews and updates its policies on human rights, whistleblower protections and supplier standards. This continuous review helps ensure our approach remains relevant and effective as stakeholder expectations and modern slavery risks evolve.

During the FY25 compliance period, the Group reviewed its Modern Slavery Policy as part of a broader review of its Code of Conduct and related internal policies to ensure ongoing alignment with our governance framework and evolving regulatory expectations. Employees were invited to participate in this review via a consultation process and the updated policies were communicated across the business and published on the staff intranet to ensure easy access and understanding.

¹ Mining contractors are responsible for providing training to contractor personnel.

4 Assessing Effectiveness

Byerwen reviews the measures outlined in this statement at least annually and whenever material changes occur within the business or supply chain that may alter our exposure to modern slavery risks. This review is governed by the requirements set out in our Modern Slavery Policy and broader processes outlined in the Group's Sustainability Policy.

Byerwen will continue to review and assess effectiveness through the following:

Assessment Area	Actions
Risk scores	<ul style="list-style-type: none"> Ongoing monitoring of inherent and unmitigated risk scores assigned to suppliers as part of the annual supplier due diligence process to determine progress in reducing overall supply chain risk.
Peer review	<ul style="list-style-type: none"> Evaluating our own processes, procedures and governance frameworks against peers within the mining industry to provide insight into the effectiveness of supplier engagement, reporting transparency and risk mitigation actions.
Cross-functional engagement	<ul style="list-style-type: none"> Feedback and consultation from cross-functional engagement across the business to ensure risks mitigation activities are driving operational awareness of modern slavery risks.
Governance documents	<ul style="list-style-type: none"> Periodic evaluations of key governance documents, such as the Group's Modern Slavery Policy and Supplier Code of Conduct by incorporating internal feedback and developments in regulatory expectations and industry practice.
Complaints and grievances	<ul style="list-style-type: none"> Monitoring of any modern slavery related complaints or grievances received through our whistleblower mechanism as they arise. While no substantiated modern slavery-related grievances were reported during the reporting period, this process remains an important safeguard and a means of identifying potential areas of concern within our operations or supply chains.

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"> Identify the reporting entity. 	1 – 2
Section 16 (1)(b)	<ul style="list-style-type: none"> Describe the reporting entity's structure, operations and supply chains. 	6 – 8
Section 16 (1)(c)	<ul style="list-style-type: none"> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns. 	9 – 10
Section 16 (1)(d)	<ul style="list-style-type: none"> 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. 	11 – 14
Section 16 (1)(e)	<ul style="list-style-type: none"> Describe how the reporting entity assesses the effectiveness of these actions. 	15
Section 16 (1)(f)	<ul style="list-style-type: none"> 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). 	2
Section 16 (1)(g)	<ul style="list-style-type: none"> Provide any other relevant information. 	2, 5

Approval of this statement

This statement has been approved by the board of Byerwen Coal 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



For more information, visit
www.qcoal.com.au

