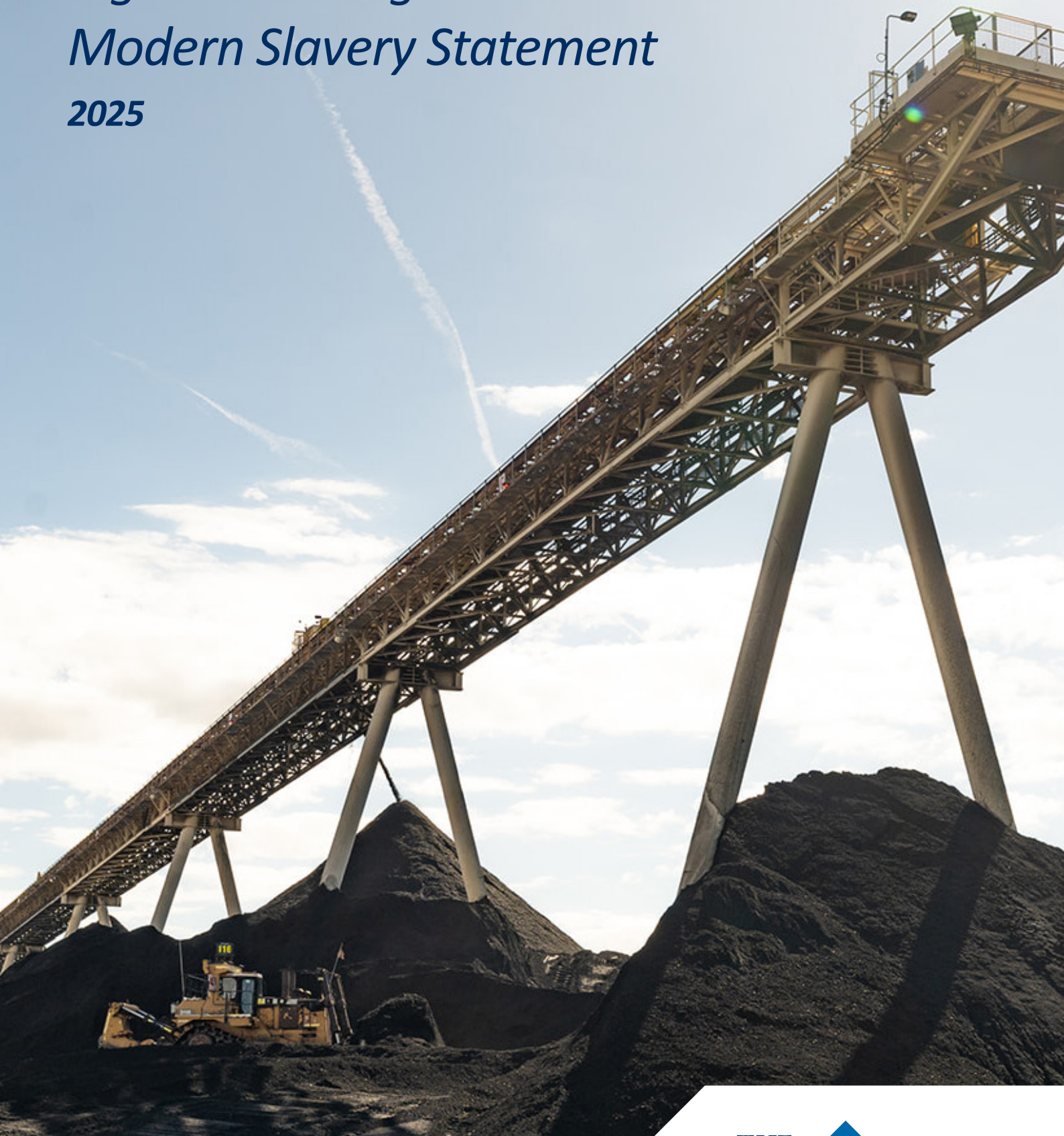


Big Ben Holdings Modern Slavery Statement 2025



THE
Bloomfield
GROUP

WE CARE. WE DELIVER.



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Our Structure and Reporting Entity

Big Ben Holdings Pty Ltd (ABN 63 008 434 562) ('BBH') is the head company of a consolidated tax group of companies which, taken together or individually, are commonly referred to in the Hunter Valley as "The Bloomfield Group".

This Modern Slavery Statement is made by BBH as a reporting entity in compliance with the *Modern Slavery Act 2018* (Cth) (the Act), and on behalf of its related bodies corporate as defined by the Corporations Act 2001.

The Boards of each of the Group Companies comprise one or more of the Directors of BBH and consultation between the Group Companies required by the Act, occurs at BBH's board meetings.

The following entities are included:

MINING

Northern Waggon Pty Ltd

Bloomfield Collieries Pty Ltd

Rix's Creek Pty Ltd

Goonbri Coal Company Pty Ltd

Curlewis Coal & Coke Pty Ltd

ENGINEERING & OTHER ENTITIES

Four Mile Pty Ltd

PWG King & Sons Pty Ltd

Four Mile Management Services Pty Ltd

McDougalls Hill Development Holdings Pty Ltd

Ashtonfields Pty Ltd

Biodiesel Industries Australia Pty Ltd

("the Group Companies")



Our Approach

Our company values **WE CARE. WE DELIVER.** underpin our commitment to the safety and well-being of our people, our local community and the environment. We believe that all people involved in our operations and supply chain should be free from modern slavery.

Our Modern Slavery Statement has been developed in accordance with our company Values and the Act. Our Modern Slavery Statement sets out the process and actions we have taken to assess and address risks of modern slavery practices in our operations and supply chains for the year ending 31 March 2025 (YEM25) (the Reporting Period).

Our values **WE CARE. WE DELIVER.** are embedded in our key Policies and underpin our commitment to human rights.

Key Policies and Management Systems within our business that relate to Modern Slavery include:

- Code of Business Conduct
- Safety and Health Policy
- People Policy
- Risk Management Policy
- Environment Policy
- Whistleblower Management System



Our Operations and Supply Chains

OUR OPERATIONS

The Bloomfield Group is a proud and successful Australian mining and engineering group. Australian owned and operated, we have been part of the community for more than 85 years and now employ hundreds of local people.

Our success has been built on a simple desire to seek excellence in all we do, respecting our history as we shape our future. Our company values underpin our approach: **WE CARE. WE DELIVER.**

We respect and care about the safety and well-being of our people, our local community and the environment. We work together with integrity to deliver safety, operational best practice, customer satisfaction and compliance.

ABOUT US



The Bloomfield Group’s main business is mining and engineering. Mining activities include the extraction of coal by open cut truck and excavator mining methods, beneficiation of thermal and semi-soft coal and loading the coal onto rail for transport to Port Waratah where the coal is loaded onto vessels for sea-borne transport to our Asian customers. Title to the coal passes to our customers when it is loaded onto the vessels.

Our engineering business provides general engineering solutions across a range of industries including mining, tunnelling and infrastructure, rail and manufacturing.

Biodiesel Industries Australia Pty Ltd manufactures biodiesel for use as fuel and in other industrial applications and provides toll refining services to companies who wish to transform waste oils or surplus feedstock into biodiesel but who do not have in-house refining infrastructure.

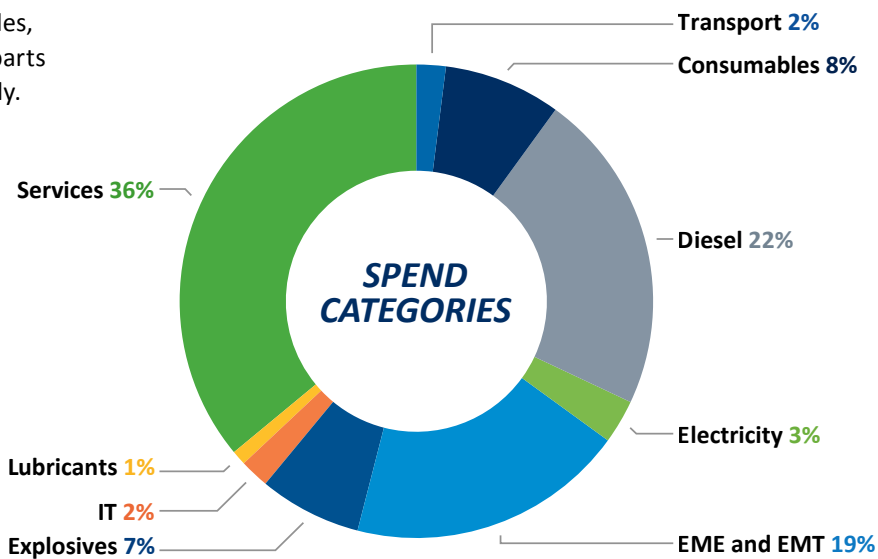
Our website bloomcoll.com.au provides further detail on our operations.

OUR SUPPLY CHAIN

The Bloomfield Group engages approximately 800 suppliers who provide goods and services across various categories including, labour, plant and equipment, fuel and lubricants, explosives, consumables, components, clothing, and PPE.

During the Reporting Period, our main categories of spend were:

- Consumables: including industrial consumables, clothing and PPE, mechanical and electrical parts supply, and hydraulic fittings and hoses supply.
- Diesel
- Electricity
- Earthmoving Equipment (EME) and Earthmoving Tyres (EMT): including heavy mechanical equipment and parts.
- Explosives
- IT: including IT equipment and systems.
- Lubricants
- Services: including consultants, contract labour, human resources and training, environmental services and farming.
- Transport

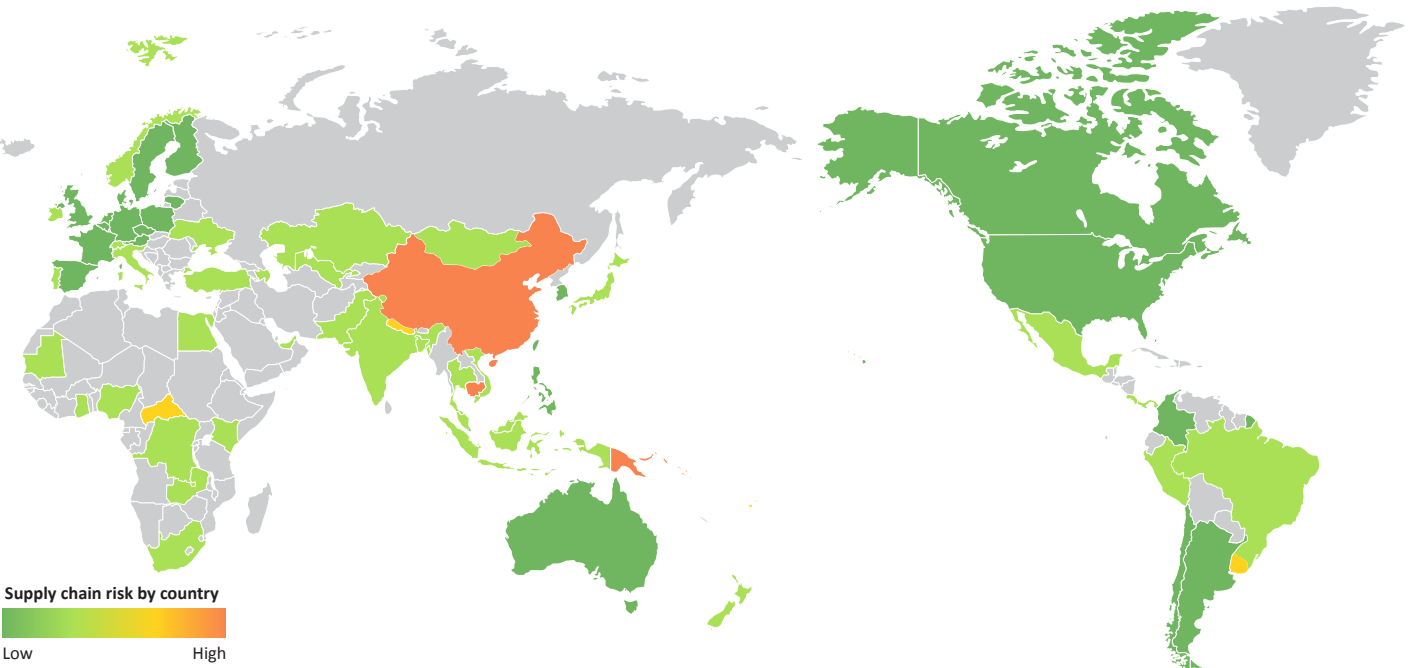


Most of the Group’s Companies do not have direct external interfaces or supply chains. Most contracts and purchases are managed and executed by Four Mile Pty Ltd, making its supply chain effectively the supply chain for the Group’s Companies. The exceptions are coal sales and rail and port contracts which are executed by Bloomfield Collieries Pty Ltd.

Where feasible, we prefer to procure goods and services locally. We assess the risk of modern slavery within The Bloomfield Group’s operations and supply chains as relatively low. Our operations are based in New South Wales (NSW), Australia, where the Global Slavery Index 2024 reports a low

incidence of modern slavery (1.6 instances per 1,000 people) compared to other countries.

However, we acknowledge that some countries and regions where a small number of our suppliers source or produce goods may present higher risks due to potential links to human trafficking. These regions are classified as “high-risk” based on their association with modern slavery risks. The geographical regions where our supply chain partners operate are shown in the map below. This map has been overlaid with the colour tier system of the [Trafficking in Persons Report](#).





Risk Assessment and Mitigation

Our approach to modern slavery risk assessment and mitigation is supported by the belief that all people involved in our operations and supply chain should be free from modern slavery.

During the Reporting Period, the Bloomfield Group's cross functional Modern Slavery Risk Review Committee continued to lead our modern slavery response. This included considering any changes across The Bloomfield Group's operations and supply chains, reviewing best practice guidance, conducting the annual modern slavery risk review and introducing third-party Modern Slavery Software (MSS), to assess modern slavery risks in our operations and supply chain.

There has been limited change to our structure, operations and supply chains during the Reporting Period and no negative or material impact on our modern slavery risk profile.

We commenced a trial of the MSS risk assessment tool during the reporting period to conduct a bulk assessment of 384 suppliers, representing over 90% of our total spend. The response rate to the assessment was 62.5%, with 240 suppliers completing it by the end of the campaign. The intention of this engagement is to assess the applicability of this tool to our operating environment and its usefulness as a risk reduction tool to our group of companies and to our suppliers.

We are very aware of the cost and productivity implications for small and medium businesses of larger business requirements. It is a matter for each supplier as to whether they find the recommendations useful and cost effective to implement and, in their judgement,

potentially useful to assist them to establish systems and documentation that larger businesses may prefer. We plan only to use a light touch, not to add a significant cost and time burden.

As we are still early in the review process, we plan to continue verifying the data outputs and working closely with our suppliers to assess the suitability of the MSS risk assessment tool in the next reporting period.

The risk review process also confirmed that we continue to maintain strong controls that mitigate a range of modern slavery risks. These controls include, but are not limited to, our Values, Policies and Management Systems, our operational locations, continuing to engage and develop strong relationships with local suppliers, and our adherence to relevant Australian legislation concerning safety, employment and industrial relations and the environment.

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire. If implemented, they will reduce the unmitigated risks identified during the assessment.

These action items were also aggregated to provide The Bloomfield Group with a focused view of the most impactful actions suppliers could be take across the supply chain. These include conducting annual training for employees on modern slavery, human trafficking, and child labour risk awareness, issuing a modern slavery risk compliance policy to suppliers, and implementing both a vulnerability assessment policy and a modern slavery risk assessment policy.

Steps that we have taken during the Reporting Period to further mitigate modern slavery risks include:

- Trialled the MSS risk assessment tool in a bulk assessment of our suppliers
- Conducted a review of our information technology contracts with suppliers to identify and minimise any potential modern slavery risks.
- Continued to collect Manufacturer Compliance Statements from our clothing and personal protective equipment (PPE) suppliers.
- Reviewed and continuously improved Policies and Systems related to human rights.
- The Modern Slavery Risk Review Committee continued to drive The Bloomfield Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review.

The effectiveness of current and future controls implemented is assessed by The Bloomfield Group on an ongoing and annual basis. This assessment is managed by the Modern Slavery Risk Review Committee, a management-level body that produces the draft report for review by executive directors initially and then by the full Board. The membership of the Committee may vary each year depending on priority topics, as outlined in the risk assessment process.



Looking forward

The Bloomfield Group aims to continue working with its suppliers and their supply chains to promote continued awareness of the risks of modern slavery and will check in with its supply chain to see whether any of the suggested action items from the MSS assessment have or will be implemented in the future.





Modern Slavery Statement Approval

As required by the Act, this statement has been reviewed by and approved by the Big Ben Holdings Pty Ltd board of directors as the principal governing body of the reporting entity and signed by its Chair.

John Richards
Chair

7 May 2025



bloomcoll.com.au

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