



QMETCO LIMITED MODERN SLAVERY STATEMENT

QMetco Limited and its operating subsidiary (QMetco) are committed to taking the issue of modern slavery seriously, including identifying, assessing and mitigating modern slavery risks in our operations and supply chains, by being compliant with all modern slavery legislation and by using our commercial leverage to reduce and contribute towards the elimination of modern slavery.

Forms of modern slavery include (but are not limited to) people trafficking, slavery, forced marriage/labour, child labour, debt bondage, servitude, and deceptive recruiting for labour or services are a violation of human rights, against the law and are completely at odds with the Company's Core Values:

- No Games,
- Be Resourceful,
- Care & Respect,
- Deliver Together,
- Challenge the Norm.

QMetco expects our employees, contractors, suppliers and business partners to:

- comply with all applicable laws, awards and agreements relating to the employment of their workers and modern slavery;
- take steps to identify, address and mitigate modern slavery existing in their operations and supply chains; and
- be transparent about modern slavery risks or occurrences, including by answering relevant questions and providing relevant information when reasonably requested.

Identification of Reporting Entities

Principal Governing Entity: QMetco Limited ABN 98 008 124 025

Reporting Entity: Foxleigh Coal Pty Limited ABN 24 125 986 549 (subsidiary)

This is a joint statement for QMetco Limited and its subsidiary.

MODERN SLAVERY REPORT 2022

QMetco structure, operations and supply chains

QMetco is a privately owned company incorporated under the Corporations Act 2001.

There is one operating asset, being the Foxleigh Coal mine in central Queensland, with a small head office in Brisbane.

The mine is operated by, a subsidiary, Foxleigh Management Pty Ltd (FoxMan) on behalf of an unincorporated Joint Venture (JV) comprising:

- Foxleigh Coal Pty Ltd (FoxCoal) (70%) – subsidiary and reporting entity
- POSCO Australia Pty Ltd (20%)
- Nippon Steel Australia Pty Ltd (10%)

Other non-operating assets are in Canada and the United States.

QMetco supply chain relates to procurement of good and services to operate a coal mine with the following general expenditure categories:

- Mining equipment
- Explosives
- Diesel fuel
- Mining consumables
- Labour and other contract services
- Maintenance services
- Port and Rail access
- Water and Electricity supply
- Finance, insurance, and other professional services

Risks of modern slavery in operations and supply chains

QMetco operations are carried out entirely within Australia and all employees are engaged on terms and conditions which comply with Australian laws and are free to join and be represented by unions.

The majority of procurement items are sourced from suppliers which are Australian based or have operations within Australia and operate under Australian laws. For the most part, these organisations have sophisticated supply chain policies and procedures in place.

However, some organisations tend to have long supply chains in multiple countries, and we acknowledge that modern slavery

risks can be present further down these supply chains. We expect increasing visibility into the actions taken by these suppliers as they move to report in accordance with the requirements of the Modern Slavery Act 2018 (Cwth).

QMetco supports local businesses and contractors within regional communities for minor procurement of goods and services, which operate under Australian laws and may not have extensive supply chains procedures.

Actions taken by QMetco during the reporting period.

QMetco is committed to operating ethically and legally, partnering with suppliers that are aligned to the values of the company and adhere to the terms of the company's commercial agreements.

The following actions were actions undertaken by QMetco during the reporting period:

1. The QMetco Board approved a Modern Slavery Statement and 2022 report that outlines the company's commitment to addressing modern slavery, expectations of suppliers, employees and business partners and procedures for reporting instances of modern slavery.
2. All new Directors and Senior Leaders, including key procurement personnel undertook on-line Modern Slavery awareness and education.
3. QMetco and FoxMan Risk Committees have Modern Slavery as a standing agenda item.
4. Using the resource *Walk Free Tool 4*, 4 high-risk procurement items were identified. Suppliers of these items were engaged with to determine their understanding or Modern Slavery; asked to confirm origin and if it was a country nominated in Tool 4, to provide comfort that Modern Slavery was not an issue in the source country.

Measuring Effectiveness

QMetco will measure effectiveness through:

- Presence of the modern slavery risk as a standing item on Risk Committee agendas
- Monitoring key and large suppliers' implementation of Modern Slavery Statements.
- Continue promotion of a greater level of awareness within our business of the nature and risks of modern slavery.

Consultation with subsidiaries and JV partners

While the Foxleigh JV is not a reporting entity, QMetco, through FoxMan with JV partner support, has added Modern Slavery as a standing agenda item for JV Management Committee meetings and there is a



Gordon Galt
Chair - QMetco Ltd



Michael Rosengren
Director – Foxleigh Coal Pty Ltd

commitment to share statements and actions to promote awareness and learning.

COVID-19 impact

In 2022 the Government imposed COVID-19 pandemic restrictions were removed, reducing potential impacts. QMetco and Foxleigh continued to comply with any Health Orders and ensure the safety of the workforce

Approval of Statement and Report

This statement and report has been authorised and approved by the QMetco Board which is the principal governing body for the reporting entity named in this statement for the purposes of the Modern Slavery Act 2018 (Cwth).