

Big Ben Holdings

Modern Slavery Statement 2022



THE
Bloomfield
GROUP

WE CARE. WE DELIVER.

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Our Approach

Our company Values: **WE CARE. WE DELIVER.** underpin our commitment to the safety and wellbeing 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 Modern Slavery Act 2018 (Cth) 'the Act'. We will be providing periodic statements in line with our corporate governance commitments. 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 2022 (YEM22).



Key Areas of Action

- ✓ A COVID-19 steering committee continued to manage the Group's response and implemented a range of measures to continue to maintain the health and safety of our workforce, the resilience of our business and the businesses that we work with, whilst mitigating potential modern slavery risk
- ✓ The procurement team and contract owners continued to conduct targeted performance reviews with relevant suppliers and maintained regular supplier engagement with other suppliers
- ✓ Review and continuous improvement of Policies and Systems related to human rights continued
- ✓ The Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review



Our COVID-19 Response

COVID-19 continued to present daily challenges for everyone. The Group continually recognised that the ongoing global pandemic had the potential to increase modern slavery risks within industries generally.

The Group continued to prioritise maintaining the health and safety of our workforce, building the resilience of our business, and the businesses we work with, to put us in the strongest possible position to navigate our way forward safely.

The Group's COVID-19 steering committee continued to manage our response including ongoing review of detailed emergency response plans, in line with Public Health Orders and best practice, aimed to protect the health and safety of workers.

We engaged regularly with our suppliers to understand the impact of COVID-19 on their businesses and we continued to work with them to provide support where we could.

The procurement team continued to manage critical suppliers and categories to support the operations, including sourcing personal protective equipment (PPE) and rapid antigen test kits (RAT) during periods of supply chain disruption and supply scarcity.

We maintained relationships with existing screened suppliers including using existing NSW based suppliers to obtain additional PPE supplies. The period from Christmas 2021 to end of January 2022 was particularly challenging to source RATs. We developed partnerships with local distributors of RAT kits made in Germany and USA.

This strategy of maintaining a local supplier base and sourcing products manufactured in low risk first world countries mitigated the increased potential of introducing modern slavery risk into our supply chain during periods of global product shortages of critical health supplies.



Our Structure, Operations and Supply Chains

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". 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 80 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 wellbeing of our people, our local community and the environment. We work together with integrity to **deliver** safety, operational best practice, customer satisfaction and compliance.

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

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

The following entities are included:

MINING

Northern Waggons Pty Ltd

Bloomfield Collieries Pty Ltd

Rix's Creek Pty Ltd

Goonbri Coal Company Pty Ltd

Curlewis Coal & Coke Pty Ltd

Genesis Coal Resources 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

("the Group Companies")

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.

About us



The 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 the customers when it is loaded onto the vessels.

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

The Group engages approximately 700 suppliers who provide goods and services across a number of different areas including: labour, plant and equipment, consumables, components, clothing and PPE.

Because we aim to develop relationships with local suppliers, our suppliers are predominantly Hunter Valley based companies. Most of the Group Companies have no direct external interfaces or supply chain themselves. In these cases, any contracts and purchases are executed by Four Mile Pty Ltd such that the supply chain for Four Mile Pty Ltd is effectively the supply chain for the Group Companies.

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

Our Key Policies

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

Key Policies and Management Systems that relate to human rights include:

- ▶ Code of Business Conduct;
- ▶ Health, Safety and Welfare Policy;
- ▶ Risk Management Policy;
- ▶ Harassment, Bullying and Discrimination Policy;
- ▶ Environment Policy; and
- ▶ Whistleblower Management System.



Risk Assessment and Mitigation

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

During the reporting period, the Group's cross functional Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review across our operations and supply chains. The Committee considered any changes that occurred throughout the Group's operations and supply chains and risk ranked our current controls against key risk indicators for modern slavery across four (4) risk areas - sector and industry risks, product and service risks, geographic risks and entity risks.

The risk review determined that the modern slavery risk across the Group's operations and supply chains remains low. The Group maintains its operational base in NSW. According to the Global Slavery Index 2018, Australia has a low prevalence of modern slavery risks (0.6 per 1000 population) in relation to other countries globally.

Our clothing and PPE suppliers were identified as requiring additional controls. We have continued to obtain Manufacturer Compliance Statements from our clothing and PPE suppliers, as this was identified in the risk review as a strategy to mitigate potential modern slavery risk. This aligns with the Global Slavery Index report that identifies garment supply as one of the top five (5) imported products at risk of modern slavery.

The risk review process identified that we continue to have strong controls in place that mitigate a range of modern slavery risks. These controls include but are not limited to our Values, Policies and Management Systems and our adherence to relevant Australian legislation concerning safety, employment and industrial relations and the environment.

Steps that we have taken during the period to further mitigate modern slavery risks include;

- ✓ A COVID-19 steering committee continued to manage the Group's response and implemented a range of measures to maintain the health and safety of our workforce, the resilience of our business and the businesses that we work with whilst mitigating potential modern slavery risk
- ✓ Continual review, in line with Public Health Orders and best practice, of detailed emergency response plans aimed to protect the health and safety of workers
- ✓ Maintained our relationships with existing screened suppliers including using existing NSW based suppliers to obtain additional PPE supplies required for our COVID-19 response
- ✓ Developed relationships with local distributors of RAT kits made in Germany and USA
- ✓ The procurement team and contract owners continued to conduct targeted performance reviews with relevant suppliers and maintained regular supplier engagement with other suppliers
- ✓ Review and continuous improvement of Policies and Systems related to human rights continued
- ✓ The Modern Slavery Risk Review Committee continued to drive the 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 has been and will continue to be assessed by the Group, on an ongoing and annual basis. This assessment is managed through the Modern Slavery Risk Review Committee which reports to the relevant Boards.

As part of the Group's commitment to reducing modern slavery risks in our operations and supply chain, consultation is undertaken with the relevant Board on an annual basis.

Looking Forward

Whilst the Group has again identified that the modern slavery risk across our operations and supply chains remains low, we recognise that efforts in relation to reducing modern slavery require us to continuously review and improve our practices.

With this in mind, the Group will continue to review, assess and address modern slavery risks through our Modern Slavery Risk Review Committee.





Modern Slavery Statement Approval

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

John Richards
Chairman

13 April 2022





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