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This statement has been prepared in accordance with the requirements of the Commonwealth Modern Slavery Act of 2018. It sets out the steps taken by Sumisho Coal Australia Pty Ltd, to prevent modern slavery in our business and supply chain.

### Introduction

This is the first Modern Slavery Statement submitted by Sumisho Coal Australia Pty Ltd, hereafter referred to as “SCAP”. SCAP recognizes that modern slavery can occur in many forms which include slavery, servitude, human trafficking forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services.

SCAP considers Modern Slavery a global issue and we believe our partners share our concern. We are aware of the risks and the effects that modern slavery can have on our operations and supply chain, we do however recognise that we cannot control the conduct our suppliers, but we expect all who have or seek to have a business relationship with us to familiarise themselves with our modern slavery commitments and to act in a way that is consistent with our values.

We are commitment treating our employees, partners, customers and suppliers fair and with respect. SCAP is thus committed to ensure we play our part in eliminating modern slavery and deepening our understanding of risks associated with Modern Slavery.

### About our Business

Sumisho Coal Pty Ltd is wholly owned by Sumitomo Corporation, one of Japan’s leading global integrated trading and investment business enterprises. Sumitomo Corporation is subject to the UK modern slavery regime and issues its modern slavery statement in accordance with s 54(1) of the Modern Slavery Act 2015 (UK).

SCAP’s primary business is investment in mining and minerals and has a supply chain made up of approximately 25 local and international Joint Venture Partners, Vendors and Entities, which include suppliers from the following sectors: Information, Communications and Technology; Property Services (including Facilities Management, Utilities, Cleaning, Waste Management and Security); Consulting Services; Office Supplies; and Joint Venture Partners.

### Risks of Modern Slavery in our operations and supply chain

Due to the nature of our business and our approach to adhering to governance and legal requirements, we assessed that we have a low risk of modern slavery where we have daily operational control. We have medium to high risk in our supply chains, where goods are purchased from overseas. SCAP understands that the environmental, social and governance (ESG) risks relating to suppliers will vary depending on their industry, geographic location and company size. Therefore, the scope of our suppliers, vendors and partners’ policies, processes and systems are expected to reflect their specific ESG risks.

### Risk management and due diligence processes

A Modern Slavery Committee Team has actively been reviewing our supply chain for the past financial year, to eliminate possible risks and putting in place, what we believe are the required barriers to address the potential risks within our supply chains and operations.

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SCAP has taken various steps and actions to ensure we are compliant with our internal governance requirements towards human rights and the requirements of the Modern Slavery Act 2018 (cht)

Actions taken to ensure that modern slavery is not taking place in our supply chain include:

- 1) Incorporating a Modern Slavery Policy and Procedure into our existing governance documents, which outlines our commitment towards eliminating modern slavery and provides guidelines on how we envisage to review, eliminate and respond/control modern slavery risks within our supply chain.

SCAP also has a Compliance Policy and Compliance Manual, as well as a Whistleblower Policy and Whistleblower Procedure, which assist in managing and reporting modern slavery. As part of our continued efforts to strengthen our Whistleblower program we have added additional ways to “speak up” where staff members (or the public) can report any breaches or concerns, including human rights concerns.

- 2) Introduction of an internal modern slavery risk assessment questionnaire (a pre-qualification/supplier on-boarding), into our vendor application/recruitment process to ensure vendors are reviewed prior to engagement. This includes completion of a vendor check sheet, which enables us to undertake compliance checks against our internal and legal requirements. It also comprises a supplier communication and verification program, which confirms that the relevant suppliers have received and understood our position regarding modern slavery.
- 3) Using recognised accredited suppliers where possible.
- 4) Completion of a Modern Slavery due-diligence audit on all suppliers and vendors to ascertain who in our supply chain are aware of Modern Slavery and which vendors are required to report according to the Modern Slavery Act, which in turn allowed us to awareness of our commitments towards eliminating modern slavery in our business environment.
- 5) We commenced reviewing supplier contracts to include a modern slavery clause at the next available opportunity (e.g. during contract renewal), if practicable and appropriate and introduced the inclusion of modern slavery clause in all new contracts and agreements, as requirements.
- 6) Provided training and shared information with our employees, suppliers, contractors and supply chain regarding modern slavery as a topic and the risks associated with engaging in modern slavery.

### Outcome and effectiveness

To date we have not yet found breaches of the Modern Slavery requirements within our Supply chain, we have however identified suppliers who are not yet aware of the Act, which allowed us the opportunity to provide further information.

We strive to implement effective measures to eliminate risks, should they arise. In the instance where a potential occurrence of modern slavery is identified, either internally or externally, then appropriate corrective action shall be taken in line with the Company’s response plan.

Due to the changing business environment SCAPH believes in continuous improvement and growth, to demonstrate progress with addressing modern slavery risks in its operations and supply chain.

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### Consultation Process

The SCAP Modern Slavery compliance commitments have been allocated to various team members that have shared responsibility to complete work across all the subsidiaries, as there are no direct employees working for any of the said companies. The roll-out of the new policies and procedures which includes the Modern Slavery Policy and Procedure was completed prior to the introduction of the MS Committee, which allowed for internal familiarisation.

An external legal team was consulted and various Modern Slavery workshops were attended to ensure a firm understanding of the requirements was gained, prior to commencement of the Modern Slavery review/audit. The Modern Slavery Committee meet fortnightly and provide feedback to Management on a monthly basis or as required.

Activation of our company BCP (business continuity plan) allowed us to safely continue our modern slavery audits, checks, meetings and familiarisation sessions online.

### Further information

A full modern slavery data base for responses and compliance requirements of all Vendors and Suppliers has been compiled for future reference as and when required.

SCAP acknowledges that Covid-19 has had a major impact on businesses and entities around the world and we will remain vigilant and continue to adhere to our legislative requirements. We have however been privileged to continue our business operations with workers working from home and continued relationships with our existing suppliers, partners and vendors.

**Mr. Susumu Ishihara**  
**Managing Director**  
**Sumisho Coal Australia Pty Ltd**

(This Modern Slavery Statement was approved by the Board of Directors on the 16<sup>th</sup> December 2020.)