

Byerwen Group Modern Slavery Statement 2024

Scope

As an Australian business generating annual consolidated revenue in excess of \$100 million, Byerwen Group 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 'The 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 2023 to 30 June 2024 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 2024.

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.

The FY24 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 9 December 2024 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

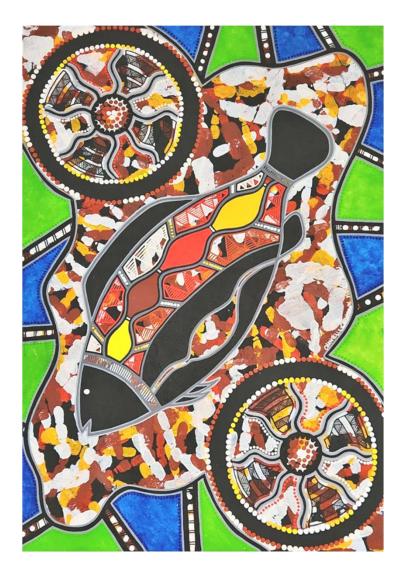
Byerwen acknowledges the Traditional Owners and Custodians of the land on which we operate and conduct our business.

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.

We are committed to engaging respectfully and collaboratively with Traditional Owners and communities to ensure the sustainable and responsible development of resources while protecting cultural heritage and promoting reconciliation.





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

Managing Director's Message



Byerwen Group is pleased to present its FY24 Modern Slavery Statement which outlines our actions to identify, assess and mitigate modern slavery risks within our operations and supply chains.

As we navigate an increasingly complex global marketplace, the mining industry's commitment to ethical business practices and human rights has never been more crucial. Modern slavery, in all its forms - whether forced labour, human trafficking, or exploitative practices - remains a pervasive issue worldwide. Byerwen Group recognises that our reach extends far beyond our immediate operations, and the potential risks within our supply chain must be vigilantly identified, addressed, and eradicated.

This report represents our ongoing commitment to transparency and accountability. Within it, we outline the steps we have taken over the past year to assess, monitor, and mitigate modern slavery risks across our operations and supply chain. As a business, we are committed to a zero-tolerance policy as part of our ongoing management of modern slavery risks and we have taken steps during FY24 to strengthen our governance and decision-making processes in relation to human rights and modern slavery accountability.

Our approach to modern slavery is not just a matter of compliance; it is an expression of our core values and commitment to refining our practices and ensuring the highest standards are upheld in every corner of our business.

Miran

Christopher Wallin Managing Director

About us

As part of the QCoal Group, Byerwen is a proudly independent Queensland-based company, and our coal operations represent that focus.

At QCoal we have been active in coal exploration, discovery and development in Queensland since 1989. As our mining projects are predominantly based in Central Queensland, each project supports thousands of workers, their families and the regional communities where they live. For each and every one of our coal projects, we strive to run our operations in an economically, socially and environmentally responsible way. This gives us the framework to ensure that we are continually focused on bettering Queensland and Australia as a whole. Our operations include the Byerwen Mine, QCoal Northern Hub (consisting of the Drake, Jax, Sonoma and Cows mines) and the Cook Colliery (refer to separate Modern Slavery statement).

QCoal Group Values

Safety

We create a safe workplace where our people are encouraged to lead others, be accountable and act responsibly. We strive to keep our operations injury and fatality free by monitoring plant, equipment and processes.

Innovation

An entrepreneurial approach is key to finding better ways to create value, in good times and bad.

Employee Choice

We believe allowing our people to choose to live locally or commute to work is an important factor in their decision to work for us, and to continue working for us.

Trust

We work with capable, self-motivated people who enjoy the opportunity and freedom to do their job. The latitude we give our team makes for challenging and exciting work.

Integrity

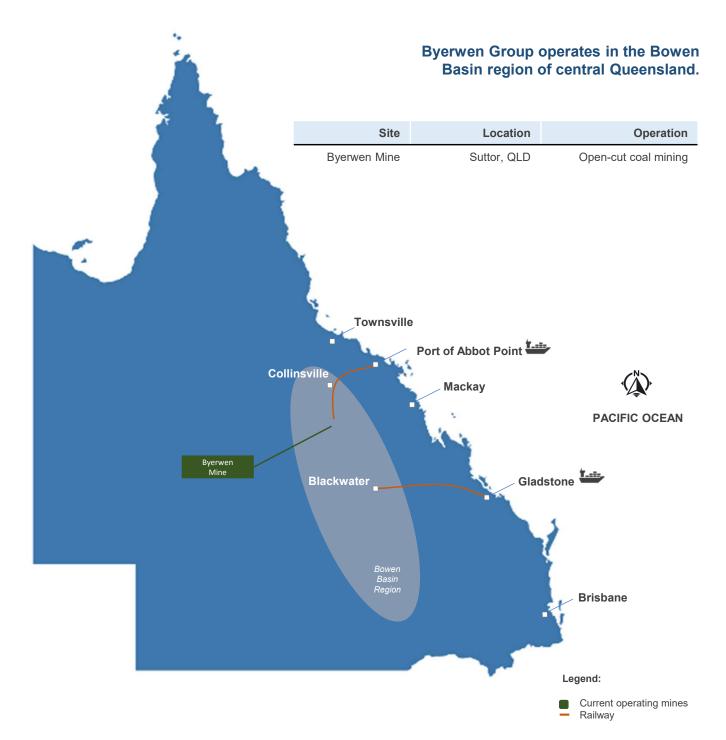
Delivering on our commitments and holding ourselves to account earns the respect of our internal and external stakeholders.

Pragmatism

We don't hide behind hierarchy, processes or systems that hinder rather than help.



1 Structure, Operations and Supply Chain



The Byerwen Group is a Queensland-based, privately owned coal producer. The Group's operations consist of the Byerwen Mine which is located in Queensland's Bowen Basin, west of the town of Glenden.

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 92 per cent of Byerwen's sales in FY24 (by tonnage) were to the Asian region.

In FY24, the Byerwen Mine exported 4.6 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).

All of the 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 1,000 employees through its key contractors at the Byerwen Mine.

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

The core activities within our operations include coal mining, handling, and processing and general exploration of mining assets.

1 Structure, Operations and Supply Chain

Byerwen Mine

The Byerwen Mine is located west of Mackay and showcases Queensland's incredible resources potential. The open-cut mine is capable of producing up to 10 million tonnes of hard coking coal per year.

QCoal Group 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

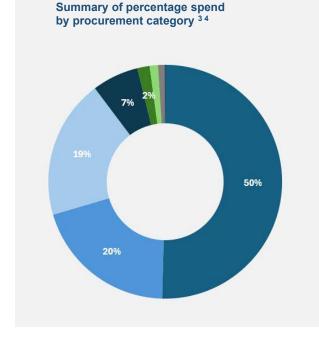
During FY24, Byerwen Group conducted a review of its supplier base which included an assessment of over 500 suppliers. These suppliers have been categorised into a broad range of procurement categories covering goods and services relating to exploration, drilling, mining services, equipment, logistics and business support functions.

Procurement activities for the Byerwen Group are conducted through a central function based in the Brisbane head office. These activities include procurement governance, contract administration, supplier engagement, invoice processing and payments.

All major expenditure is procured in Australia from a small number of large contractors and suppliers who are Australian entities with documented procurement policies and procedures. 1,123

Contractors employed across our operations as at 30 June 2024 ¹

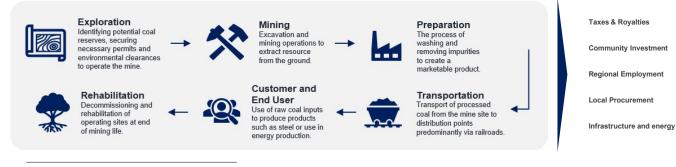
Suppliers paid during the period ended 30 June 2024 ²



50%	Mining Services
20%	Port and Rail
19%	Fuel
6%	Drilling and blasting
2%	Water
1%	Electricity
1%	Business, legal and consulting services

Byerwen's Mine to Market Lifecycle

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



1 Excludes contractors employed at QCoal Group mines (Northern Hub and Cook Colliery).

- 2 Excludes suppliers paid relating to procurement by QCoal Group mines (Northern Hub and Cook Colliery).
- 3 Excludes government, tax and other regulatory payments.
- 4 Excludes intercompany payments between QCoal Group entities and other related parties.

2 Risks of Modern Slavery

Risks in Operations

During FY24, the mining operations of the Byerwen Group were carried out entirely within Queensland, Australia. Accordingly, we have assessed that risks of modern slavery are more significant in our broader supply chain than in our operations. All individuals employed through related party entities are engaged on terms and conditions which comply with Australian employment law. Our contractors are also required to comply with these employment standards.

Risks in Supply Chains

Sourcing and procurement of goods and services through sustainable supply chain practices is a key priority of the Byerwen Group. In doing so, we are committed to maximising local industry participation and our contractors give preference to suppliers of Australian-sourced goods, services and equipment that is competitively priced and complies with Group procurement policies and vendor purchasing requirements. Despite this, we recognise that even if a supplier is based in Australia, it may have supply chains and/or related entities in foreign jurisdictions which may increase the risk of modern slavery. Byerwen Group's risk assessment therefore incorporates a holistic approach to supplier risk management that considers a range of factors such as procurement category, country of origin, supplier governance and total spend metrics. This is important as a supplier operating in a higher-risk jurisdiction, for example, may have robust and effective control frameworks in place to mitigate the risks of modern slavery. It also highlights the need for effective ongoing engagement with suppliers to ensure risk assessments are up-todate and that emerging risks are identified in a timely manner.

Our ongoing due diligence processes include an annual assessment of both Tier 1 suppliers and other potential high-risk suppliers within our supply chain. Extensive supplier due diligence is also undertaken on all new and prospective vendors.

Modern Slavery Supplier Risk Matrix

During FY24, Byerwen Group implemented a Supplier Risk Matrix to assess and evaluate our operational risk and supply chain risk. The matrix is based on various factors such as geography, industry, labour practices, supplier size, and transparency of reporting. The matrix helps identify high-risk suppliers and prioritise actions accordingly.

After evaluating a supplier on each of the risk factors categories, each factor is assigned a score from 1 (low risk) to 3 (high risk). The total score helps determine the overall risk level of the supplier. **Low Risk (Total Score 5-7):** Routine monitoring and standard due diligence are sufficient, with periodic checks and engagement to ensure ongoing compliance.

Medium Risk (Total Score 8-11): Further due diligence and targeted risk mitigation efforts are prioritised. This may include more frequent engagement with the supplier to address identified gaps.

High Risk (Total Score 12-15): Immediate action is required, including detailed audits, corrective action plans, and potentially reevaluating or discontinuing the business relationship if the supplier is unable to address the identified risks.

Risk Factor	Low Risk (1)	Medium Risk (2)	High Risk (3)
Geography (location of supplier)	 Supplier operates in a low-risk country with strong labour laws (e.g. Australia, Western Europe, North America, etc.) 	 Supplier operates in countries with moderate risk of labour exploitation (e.g. Eastern Europe, some parts of Latin America) 	 Supplier operates in high- risk countries with weak labour laws or known for modern slavery risks (e.g. parts of Southeast Asia, sub-Saharan Africa)
Industry sector	 Low-risk industries with strong labour standards (e.g. technology, finance, professional services) 	 Moderate-risk industries where labour abuses are occasionally reported (e.g. retail, food processing, manufacturing) 	 High-risk industries known for exploitative labour practices (e.g. agriculture, textiles, construction, domestic work)
Supplier size and resources	 Large, well-established suppliers with established ethical sourcing programs and certification (e.g. ISO, Fair Trade) 	 Medium-sized suppliers with some risk mitigation practices but lacking full certifications or clear policies 	 Small or informal suppliers, often with limited resources for risk management or no certifications
Labour practices	 Supplier has clear policies and practices in place to prevent forced labour, child labour, or exploitation 	 Supplier has some labour policies, but practices or monitoring are inconsistent across operations 	 Supplier has no clear labour policies, poor monitoring, or history of non-compliance with labour standards
Transparency and reporting	Supplier is transparent about operations and regularly publishes reports on labour conditions, sustainability, and compliance	 Supplier provides some transparency but lacks detailed reporting or regular updates on labour practices 	Supplier is non-transparent or opaque about operations and has not provided labour practice reports or certifications

2 Risks of Modern Slavery

Higher-Risk Supplier Categories

We have identified the following supplier categories which are considered higher-risk in relation to modern slavery practices in our supply chains.

Risk Category	Key Risk Factors	
Facility management	 This category encompasses office, site and mining support such as cleaning, catering, on-site security and other mining support involving manual or low-skilled labour. This workforce is often structured through sub-contract arrangements with the risk of misleading and exploitative recruitment and retention practices. 	
Blasting supplies	 Blasting explosives and chemicals are used throughout various stages of Byerwen's mining operations and in our coal handling and preparation plants. Key risks relate mainly to the materials and inputs used to manufacture the chemical and explosives which are often extracted and refined in high-risk countries. 	
Shipping	 The majority of Byerwen's product is exported to foreign markets. Our customers are responsible for utilising shipping agents and port services for ship loading and other logistics. Ports and shipping agents generally don't have operational control or oversight of conditions onboard vessels, resulting in limited visibility on labour practices. 	
Personal protective equipment (PPE)	 PPE and other apparel used on site is often manufactured in higher-risk jurisdictions utilising a lower skille and lower paid workforce. Key risks relate to vulnerable and at-risk migrant workers where supply chains are long and complex. 	
Information Technology	 Byerwen Group utilises a range of technology that enables us to operate our business across multiple operating sites (including head office). Technology supply chains can be complex, and hardware products are often manufactured in multiple locations and higher-risk jurisdictions with potential for forced and/or child labour. 	

FY24 Supplier Assessment Results

During FY24, we found the majority of assessed suppliers were categorised as 'low' or 'medium' risk based on the Supplier Risk Matrix, with no suppliers meeting the risk definition of 'high' risk.

Low risk Suppliers

A significant portion of our suppliers were assessed as low risk, meaning that they demonstrated strong labour practices, complied with applicable employment laws and showed clear commitment to preventing modern slavery through established policies, processes and frameworks. These suppliers had transparent operations, provided good working conditions for employees, and actively engaged in ethical sourcing practices.

Medium risk Suppliers

A smaller proportion of suppliers were categorised as medium risk. These suppliers operated in regions or industries where the risk of modern slavery was more prevalent, but they had demonstrated efforts to mitigate those risks through policies, audits, and supplier agreements.

High risk Suppliers

No suppliers were identified in the assessment as 'high' risk for the FY24 reporting period.

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

Medium Risk Low Risk 0% 20% 40% 60% 80% 100%

Summary of Supplier Risk Categorisation

Risk Controls

- 100 per cent of assessed suppliers had frameworks and processes in place to understand and map supply chain risks.
- 93 per cent of assessed suppliers had a formal Modern Slavery policy and/or a commitment to address modern slavery supply chain risks.
- 60 per cent of assessed suppliers had a formal corrective action protocol or policy outlining actions to be taken if modern slavery risks are identified in their supply chain.
- 7 per cent of assessed suppliers sourced products and/or services from high-risk jurisdictions with lower labour standards and protections for workers.

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.

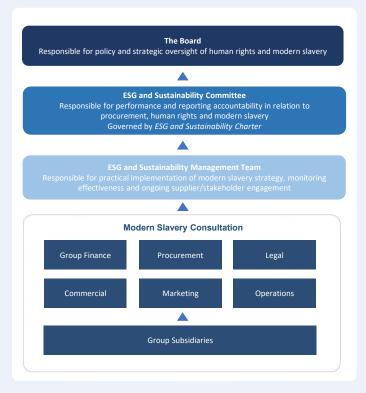
Strong sustainability governance plays a critical role in ensuring all human rights and modern slavery risks are appropriately identified and addressed throughout our operations and supply chains.

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 have 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.

QCoal'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 QCoal 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



Assessing and Addressing Modern Slavery Risks 3

2024 Progress

3

Investigated and assessed options for implementing a modern slavery assessment tool across our business for evaluation of modern slavery risks and supplier risk profiling.

Implemented a modern slavery Supplier Risk Matrix to assist in evaluating and prioritising the risks associated with suppliers based on various factors and to prioritise actions accordingly.

Undertook a gap analysis to identify opportunities for improvement in the way we assess and address modern slavery risks in line with the UN Guiding Principles on Business and Human Rights ('UNGPs').

Supplier Risk Assessment and Due Diligence

As part of our ongoing supplier engagement process, Tier 1 suppliers and other suppliers considered to be in a 'high-risk' procurement category were asked to complete a Supplier Assessment Questionnaire ('SAQ'). The questionnaire is designed to determine the effectiveness of governance and controls of key suppliers with the view to mitigating risks of modern slavery in our supply chains. This includes obtaining an understanding of areas such as:

- Utilisation of technology to assess supply chain visibility;
- . Existence of modern slavery policy and/or frameworks to assess modern slavery compliance;
- Internal resourcing to monitor and address modern slavery risks;
- Processes for supplier engagement and collaboration on supply chain issues;
- Key sources of inputs for manufacture or delivery of products and services;
- Strategies for internal training and awareness of modern slavery risks; and
- Frameworks in place for identifying, assessing and responding to instances of modern slavery.

Upon receipt of supplier responses, an internal review is conducted to assess the suitability of information provided. Where necessary, subsequent follow up and additional information is requested to ensure Byerwen Group is able to make a thorough determination on the risk profile of each supplier. A further review of publicly available governance documents is also conducted. Work is also undertaken to support and guide suppliers where necessary to improve areas of unmitigated risks.

Awareness Training

Byerwen Group is committed to ensuring all key personnel are appropriately trained and aware of modern slavery risk factors within our operations and supply chains. Targeted training ensures that the Group is able to address the risks of modern slavery and equips our workforce with the capacity to respond appropriately where required. These sessions are delivered as part of the Group's broader efforts to raise internal capability on ESG and sustainability matters, with a focus on modern slavery awareness, regulatory reporting requirements, human rights trends and their application to the mining industry.

To further support the education of our employees, we aim to develop a modern slavery guide which provides a comprehensive overview of local and international modern slavery trends and types of risks within the mining industry. The guide is also intended to provide an overview of Byerwen Group's internal policies, commitments to addressing modern slavery risks in our operations and supply chains and a yearly review of outcomes across the group.

Internal Policies and Procedures

Byerwen Group continues to refine its internal policies and procedures in relation to human rights compliance, whistleblower protections and supplier codes of conduct. This ongoing process is key to maintaining compliance with evolving stakeholder expectations and the dynamic nature of modern slavery risks and human rights requirements. It is also important in the context of the recent Australian Government review into the effectiveness of Australia's modern slavery legislation. Of the 30 recommendations arising from the review, the Government has provided full, part or in-principle support to 25 of the recommendations resulting in likely future changes to the modern slavery reporting regime in Australia.

During the FY25 reporting period, we aim to review our Modern Slavery Policy, internal processes and readiness to respond to enhanced statutory requirements in future reporting periods.

2025 Priorities

Progressively implement a modern slavery assessment tool to expand the scope of supplier risk engagement and develop a more in depth understanding of risks in our supply chain.

Expand supplier and contractor engagement efforts to broaden depth and understanding of supply chain risks, transparency and traceability.

Review and assess supplier onboarding and engagement processes including updating Supplier Code of Conduct and ensuring related procurement requirements align with UNGPs.

4 Assessing Effectiveness

Byerwen Group is committed to the ongoing improvement of our modern slavery risk management approaches including measuring the effectiveness of risk mitigation initiatives. We acknowledge that measuring effectiveness of our actions is an evolving process that requires careful consideration of the growing complexities of our supply chains.

Byerwen Group will continue to mature our modern slavery risk management framework and assess effectiveness through the following:

Assessment Area	Actions	
Monitoring and assessment	 Ongoing monitoring and assessment of industry best practice and keeping up to date with emerging regulatory changes and compliance requirements. 	
Peer review	• Evaluating our own processes, procedures and governance frameworks against peers within the mining industry and other related sectors.	
Cross-functional engagement	• Continuing cross-functional engagement across the business to ensure risks are mitigated and driving operational awareness of modern slavery risks.	
Training and awareness	• Ongoing training and awareness sessions for targeted teams to embed modern slavery in decision-making processes and fostering a culture of continuous improvement where gaps and opportunities are identified and addressed.	
Complaints and grievances	 Monitoring of any modern slavery related complaints or grievances received through our whistleblower mechanism and other channels as they arise. 	
Due diligence	• Continuing to ensure targeted due diligence is undertaken across our Tier 1 supplier group and other higher- risk suppliers through ongoing engagement and evaluation of supply chain visibility.	

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)	Identify the reporting entity.	1, 2
Section 16 (1)(b)	• Describe the reporting entity's structure, operations and supply chains.	6, 7, 8
Section 16 (1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns.	9
Section 16 (1)(d)	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.	9, 10
Section 16 (1)(e)	Describe how the reporting entity assesses the effectiveness of these actions.	13
Section 16 (1)(f)	• 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)	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

