

Big Ben Holdings

Modern Slavery Statement 2020



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. This is our first Modern Slavery Statement which 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 financial year ending 31 March 2020 (YEM20).



Key Areas of Action

- ✓ Established a cross functional Modern Slavery Risk Review Committee and conducted our first risk review across our operations and supply chains
- ✓ Amended tendering process to include the review of supplier compliance with the Act
- ✓ Updated contractual arrangements so that suppliers are required to confirm their compliance with the Act
- ✓ Implemented additional controls for existing clothing and PPE Suppliers to provide Manufacturer Compliance Statements annually. This control is also included in the tender process



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. Underpinning our approach are our company values: **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.

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 across mining and engineering. The main activities in relation to mining are conducting open cut mining operations and washing and loading the coal onto rail for transport to the port.

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

The Group engages approximately 350 suppliers to provide goods and services across a number of different areas including; labour, plant and equipment, consumables,

components, clothing and PPE. We aim to develop relationships with local suppliers with the result being that our suppliers are predominately made up of local 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 established a cross functional Modern Slavery Risk Review Committee and conducted our first risk review across our operations and supply chains. The Committee considered 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 process identified a low risk of modern slavery across our operations and supply chains. The Group's operational modern slavery risk is low with operations based only in NSW, Australia. 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.

In relation to suppliers, our clothing and PPE suppliers were identified as requiring additional controls. This resulted in the implementation of supplier Manufacturer Compliance Statements, to mitigate potential modern slavery risks. This aligns with the Global Slavery Index report that identifies garment supply as one of the top 5 imported products at risk of modern slavery.

During the process it was identified that we already 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 & the environment.

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

- ✓ Amended tendering process to include review on supplier compliance with the Act
- ✓ Updated contractual arrangements so that suppliers are required to confirm their compliance with the Act
- ✓ Implemented additional controls for existing clothing and PPE Suppliers to provide Manufacturer Compliance Statements annually. This control is also included in the tender process

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 who report 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 Boards on an annual basis.

Looking Forward

We recognise that efforts in relation to reducing modern slavery require us to continuously review and improve our practices.

With this in mind, we have identified the following **priorities for the Group**:



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

25th September, 2020





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