

# Modern Slavery Statement

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## WIGGINS ISLAND COAL EXPORT TERMINAL

# MODERN SLAVERY STATEMENT

Published: 21 November 2024




# Modern Slavery Statement

## DOCUMENT INFORMATION

### DOCUMENT ACCOUNTABILITY

TERM	DEFINITION	POSITION
Owner/Approver	Accountable for approval and authorised discretion to implement or significantly change the system.	Board
Facilitator	Accountable for implementing the application of the system and facilitating appropriate conformance.	General Counsel, People & CoSec

### VERSION CONTROL

VERSION	DATE	REVISION DETAILS	FACILITATOR	APPROVER	SIGNATURE
1.0	25/02/2021	<i>Issued for use</i>	A Allard	Board	
2.0	09/12/2021	<i>Revised and issued for use</i>	A Allard	Board	
3.0	16/12/2022	<i>Revised and issued for use</i>	A Allard	Board	
4.0	12/12/2023	<i>Revised and issued for use</i>	A Allard	Board	
5.0	21/11/2024	<i>Revised and issued for use</i>	A Allard	Board	

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## 1. OVERVIEW

The WICET Group is committed to taking action to protect against its involvement in Modern Slavery and has prepared this statement in accordance with that objective and in line with its requirement to report under the Australian Modern Slavery Act.

## 2. IDENTIFICATION OF REPORTING ENTITY

The WICET Group comprises the following three Australian registered companies:

- WICET Holdings Pty Ltd (Holdings)
- Wiggins Island Coal Export Terminal Pty Ltd (WICET)
- WICET Services Pty Ltd (Services)

This statement has been prepared as a joint report for the three entities comprising the WICET Group.

The WICET Group's engagement and procurement activities are primarily conducted through WICET and Services. Holdings is a co-signatory to some agreements but is not a primary contracting party.

## 3. WICET GROUP STRUCTURE OPERATIONS AND SUPPLY CHAIN

The WICET Group is governed by:

- the Corporations Act;
- their respective Constitutions; and
- the Shareholders Agreement.

Given the WICET Group is an incorporated joint venture, the main governing document for the group is the Shareholders Agreement. It was entered into by WICET Holdings, WICET and others (including Initial A Class Shareholders and Initial Affiliated ToP Shippers) on 23 August 2011 to record how the WICET Group and the Terminal would be owned, managed and controlled.

### 3.1 STRUCTURE

WICET and Services are wholly owned subsidiaries of Holdings. The WICET Group is owned by the following entities who each hold an A Class Share in Holdings:

- Coronado Curragh Pty Ltd
- Rolleston Coal Holdings Pty Ltd
- Yancoal Resources Limited

### 3.2 OPERATIONS

The WICET Group owns and operates a Terminal in the Port of Gladstone. The Terminal facilitates the export of coal and consists of onshore rail unloading facilities connected to a stockyard by a 5.6km overland conveyor, a stockyard with a gantry stacker and reclaim conveyors, and an offshore

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unloading facility consisting of a jetty and wharf structure, a conveyor to transport coal and a shiploader.

### 3.3 SUPPLY CHAIN

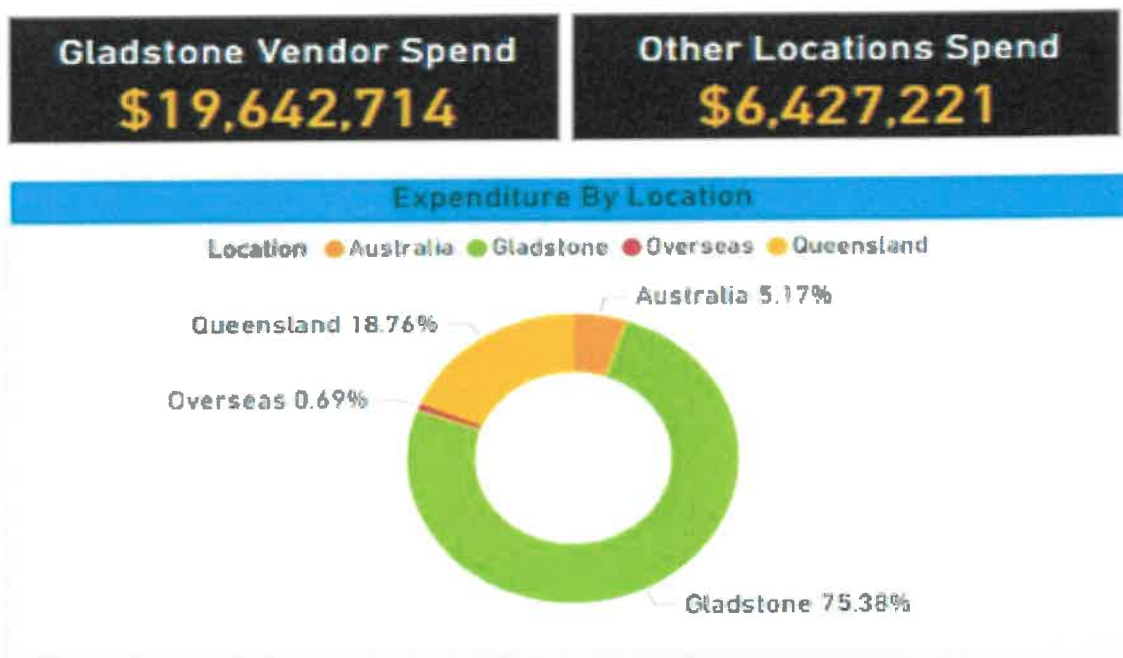
The WICET Group provides the services of unloading trains, storing coal, and loading vessels. Ownership of the coal remains the property of the coal producer who engages with the WICET Group to transfer the coal from the train through its stockyards and then onto ships to be transported to the end purchaser of the coal. The trains that transport the coal to the Terminal and the ships that transport the coal to its purchaser are engaged by the coal producers and not by the WICET Group. The coal supply chain covers mining of Australian based mines through to delivery at the end consumers facilities.

As a result, the supply chain for the WICET Group is limited to the procurement of goods and services, including employees to maintain and operate the Terminal.

A summary of the types of engagements for the WICET Group is listed below:

- Direct employment of workers: The WICET Group employs approximately 100 people under individual agreements and Enterprise Bargaining Arrangements. All employees are based in Queensland and governed by state and federal legislation.
- Payments to suppliers for goods and services: The Group has approximately 102 contracts in place for the procurement of goods and services. When measured by value 99% of purchases are made through Australian entities.

The graph below shows annual payments to suppliers broken down by location of the supplier.



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\*Local expenditure reporting base on last 12 months from December 2023 excludes corporate categories.

## 4. IDENTIFIED RISKS OF MODERN SLAVERY PRACTICES

The WICET Group has continued its risk review of each of its engagement areas summarised in the below table. The risk review is used by the WICET Group to determine what additional actions it needs to take to protect against its involvement in Modern Slavery.

Each area has been colour coded as follows:

Green - for LOW RISK

Orange-for MEDIUM RISK or where INSUFFICIENT INFORMATION IS AVAILABLE TO DETERMINE RISK LEVEL

Red -for HIGH RISK

Supply Chain Type	Risk Areas	Risk Assessment
Insurance	<ul style="list-style-type: none"> <li>• Employment practices of insurers</li> <li>• Association of insurers with other high risk industries</li> </ul>	The risk is considered to be low as the majority of insurers are located in Australia and United Kingdom where it is expected they will also be subject to Modern Slavery legislation and reporting requirements
Coal Shipping Services	<ul style="list-style-type: none"> <li>• Employment practices of coal mining companies</li> <li>• Employment practices of ships transporting coal</li> </ul>	<p>It is likely that the workforce of the coal companies located in Australia are engaged under individual agreements which are equal to or better than the National Employment Standard (NES) or under EBAs approved by the Fair Work Commission as satisfying the "Better off Overall" test. Separately it is expected that the coal mining companies are subject to Modern Slavery legislation and reporting requirements.</p> <p>As the WICET Group does not engage the ships transporting the coal it has no right to access records regarding the employment practices of these ships. However, this area will to the extent possible be kept under notice to determine if risks exist and if so how to address them.</p>
Insurance broking Services	<ul style="list-style-type: none"> <li>• Employment practices</li> </ul>	The risk is low as the entity the WICET Group engages are based in Australia and the United

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	<ul style="list-style-type: none"> <li>• Association of entity with other high risk industries</li> </ul>	Kingdom where it is expected they will be subject to Modern Slavery legislation and reporting requirements
Engagement of Employees	<ul style="list-style-type: none"> <li>• Employment standards and practices</li> </ul>	The risk is low. All WICET Group employees are engaged on individual contracts that are equal to or better than the NES or under an EBA approved by the Fair Work Commission as passing the "Better off Overall" test.
Engagement of Contractors and Consultants	<ul style="list-style-type: none"> <li>• Employment standards and practices of contractor and consultant entities</li> <li>• Association of contractors and consultants with other high risk industries/suppliers</li> </ul>	<p>The majority of the WICET Group's contractors and consultants are Australian based. As part of its contracting process the WICET Group requires entities to provide details of their EBA employment agreements and Labour Hire Licensing requirements. On that basis the risk in this area is low.</p> <p>The WICET Group continues to request that its Contractors and Consultants advise whether they are required to report under the legislation and whether they are reporting. These responses are not always provided. The WICET Group has also included Modern Slavery compliance clauses in its engagement documents and in its tender and pre-qualification criteria. In the current reporting period, the WICET Group has categorised its suppliers into 4 categories (required to report, not required to report, low expenditure/activity and no response received). Based on the categorisation of suppliers the risk to the WICET Group would appear to be low however this category has been kept at a Medium risk level as it will require continuous monitoring.</p>
Procurement of Goods and Services	<ul style="list-style-type: none"> <li>• Employment standards and practices of entities in the supply chain for the goods/services</li> </ul>	The WICET Group's strategy is to source its goods and services from local suppliers (Gladstone and/or Queensland). Currently approximately 75% of its spend is local to Gladstone and 94% is within Queensland including the Gladstone spend.

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	<ul style="list-style-type: none"> <li>• Manufacture of goods overseas in high risk countries</li> </ul>	<p>The WICET Group continues to issue requests to all of its goods and services providers asking that they advise whether they are required to report under the legislation and whether they are reporting. These responses are not always provided. The WICET Group has also included Modern Slavery compliance clauses in its engagement documents and in its tender and pre-qualification criteria. In the current reporting period, the WICET Group has categorised its suppliers into 4 categories (required to report, not required to report, low expenditure/activity and no response received).</p> <p>Based on the categorisation of suppliers the risk to the WICET Group would appear to be low however ongoing assessments will continue to occur to ensure that the appropriate level of focus and oversight is maintained. As expected a majority of entities are not required to report under the legislation. This category has been kept at a Medium risk level as it will require continuous monitoring to determine if risks exist and if so how to address them.</p>
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## 5. ACTIONS TAKEN BY THE WICET GROUP

Since the commencement of the Modern Slavery Act and in the previous reporting periods the following actions were taken by the WICET Group:

1. The issued of a Modern Slavery questionnaire to its contractor/consultant/good and services provider entities;
2. Identification of entities that it expects might be required to report under the legislation;
3. Tracking location of spend at a local (Gladstone), State and Australian based level;
4. Review of responses from its contractor/consultant/goods and services provider entities;
5. Updated its contractual documents to include Modern Slavery compliance requirements;
6. Included Modern Slavery compliance requirements in its tender and pre-qualification documentation for review when engaging new contractor/consultant/goods and services provider entities;
7. Included Modern Slavery compliance requirements as a topic in its progress/performance meetings with the entities it engages.



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In the current reporting period, WICET Group supplier Modern Slavery risk profile remains consistent with the previous reporting period noting the following:

- There are 396 suppliers contained in WICETS Groups' register;
- Expenditure has occurred with 255 suppliers
- Local expenditure (Gladstone) has increased from 70% to 75%
- For the FY24 period, the expenditure to these suppliers amount to \$27M
- The WICET Group has categorized its suppliers into the following groups by reference to the Modern Slavery Act
  - 1. Required to Report
  - 2. Not required to report
  - 3. Low expenditure / activity
- 95% of the WICET Groups expenditure is with entities falling into the groups 1& 2.

Based on the above data, the WICET Group has assessed its risk of exposure to Modern Slavery as low as the bulk of its suppliers are captured by and required to report under the legislation or are locally based. Whilst some categories in section 4 above are categorised as medium, this is to indicate the requirement to carry out ongoing monitoring rather than an increased level of risk exposure.

The WICET Group's Modern Slavery reporting is updated regularly as suppliers and/or spending patterns change. These points are expanded on below.

## Assess the Risks

The WICET Group has moved to a phase of continually reviewing and reporting on its suppliers to determine its modern slavey risk. The current status of the ongoing risk assessment work undertaken by the WICET Group has been detailed in section 4 of this report.

## Identify What is Already Being Done

The WICET Group is already taking the following actions to minimise the risk of its involvement in Modern Slavery:

- Local sourcing strategy - the WICET Group focusses on sourcing as many goods and services as possible from businesses local to Gladstone and Queensland. Local sourcing has increased during the reporting period.
- Engagement of its own workforce through individual agreements that are equal to or better than the NES and an EBA approved by the Fair Work Commission that satisfies the "Better off Overall" test. The WICET Group had its current EBA approved in November 2023 with an expiry date of November 2026.
- Review of employment practices (EBA agreements).
- Tracking and reporting on Modern Slavery information obtained from suppliers and spend profile.

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## Identify What it Will Do In Future

In addition to what it is already doing and the actions it has completed in the current reporting period as set out in part 5 above, the WICET Group intends to adopt the following additional measures in the next reporting period:

- Continue with its local sourcing strategy;
- Seek responses from the entities who have not yet responded to the request to provide details as to whether they are captured under the Act and determine if they have prepared a Modern Slavery Statement;
- Continue to identify which of its suppliers are captured under the Act and determine if they have prepared a Modern Slavery Statement;
- Utilise the tender criteria and pre-qualification criteria in engaging any new contractor/consultant/goods and services provider entities.

## 6. WICET GROUP ASSESSMENT OF EFFECTIVENESS OF ACTIONS

The WICET Group has implemented the following to assess the effectiveness of its actions to protect against the risk of involvement in Modern Slavery:

- Information and training to the key staff involved in procurement and engagement of contractors, consultants and suppliers to the business to ensure they are aware of the measures that are currently in place and those that are to be implemented.
- Including Modern Slavery as an item for discussion at contractor/consultant/supplier performance meetings.
- Ongoing review by the General Counsel, People and CoSec and the Commercial lead on the following areas:
  - Number of contractors, consultants and suppliers engaged by the WICET Group;
  - To the extent that information is available, determine whether engaged entities are required to and are complying with Modern Slavery reporting requirements;
  - Whether the tender process and transaction approval process is being followed internally to ensure that Modern Slavery processes are being followed by the WICET Group.

## 7. CONSULTATION PROCESS

Each of the entities in the WICET Group has a common Board of Directors who meet at least every 2 months. Each of the A Class Shareholders in the WICET Group has an appointed Director nominated to the Board. The requirement to produce a Modern Slavery Report is included in the non-financial auditing program for the WICET Group and is reported on annually at the May and December Board meetings. The WICET Group has a central procurement function that manages procurement for the Group and undertakes the monitoring and categorising of suppliers to facilitate the risk assessment of

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the supply chain for the WICET Group. This report was taken to the Board meeting for review in November 2024 and was subsequently approved by the Board for submission. In addition to the approval of the statement by the Board, the Statement is reviewed and updated by the Commercial Officer who heads the procurement function for the WICET Group and the Company Secretary.

## 8. OTHER RELEVANT INFORMATION

The WICET Group does not have any other relevant information to include in its statement for this reporting period.

Approved by the Board of the WICET Group

  
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Signed: Darryl D McDonough - Chairman

Date: 21 November 2024

