

# Marubeni Coal

Marubeni Coal Pty. Ltd.

(INCORPORATED IN QLD)  
ABN 57 009 932 236

## Modern Slavery Statement

MARUBENI COAL PTY. LTD.  
FY2020

This statement covers the activities of Marubeni Coal Pty. Ltd. (ACN 009 932 236) during the year ended 31 December 2020.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of Marubeni Coal Pty. Ltd. on 23 March 2021.

### About us

At Marubeni Coal Pty. Ltd., we believe respect for the human rights of people affected by our business activities is essential and we take appropriate corrective measures if there is evidence that our business activities have had a negative impact. Marubeni Coal Pty. Ltd. seeks to create sustainable value by conducting business activities that respect human rights.

### Our structure

Marubeni Coal Pty. Ltd. is a company incorporated in Australia and our registered office is located at Suite 3705, Level 37 Riverside Centre, 123 Eagle Street, Brisbane, QLD, 4000, Australia.

Marubeni Coal Pty. Ltd. is a subsidiary of Marubeni Corporation, headquartered in Japan. Marubeni Corporation and its subsidiaries (**Marubeni Group**) conduct a diversified range of business activities.

Marubeni Coal Pty. Ltd. does not own or control any entities, however we do have a number of minority interests in joint ventures as described below.

### Our operations

Marubeni Coal's key operations are related to equity investment in the coal mining sector. We invest in coal mining joint ventures (unincorporated and incorporated). All the unincorporated joint ventures we have interests in are operated by respective joint venture managers, and we are not directly involved in the day-to-day operations.

We have interests in Jellinbah East Joint Venture, Lake Vermont Joint Venture, Hail Creek Joint Venture, Roper Creek Joint Venture and Macquarie Coal Joint Venture, all located in Australia. We have a minority shareholding in Jellinbah Group Pty. Ltd. which manages the Jellinbah East and Lake Vermont mines.

We employ 6 staff to run our operations.

### Our supply chain

We have interests in the above-mentioned joint ventures and company which we do not operate directly.

As we are only engaged in the strategic decision making with respect to our investments, we are not directly involved in any supply chain. Therefore, there are no goods and services that we directly procure in relation to our coal mining investments.

We have a few ancillary goods suppliers, and most of them are indirect suppliers including office suppliers. In case we find any ancillary goods which have doubt related to modern slavery risk we will investigate the detail and consider the appropriate measures to mitigate modern slavery risk.

## **Modern slavery risks**

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations.

### ***Risk assessment methodology***

Marubeni Coal Pty. Ltd. has introduced a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services and geographical location.

The initial risk assessment has indicated that our operations have a low potential for modern slavery risks. Our risk profile is summarised in the table below.

### ***Risk profile***

<b>Risk</b>	<b>Description of risk</b>
Sector /Industry	Our business is investment in the Australian coal mining sector and we do not operate our joint ventures directly. The coal mining industry in Australia is generally considered low risk because its industrial environment is highly regulated and monitored by independent and governmental parties.
Product / Service	There are no goods and services that we directly procure in relation to our coal mining investments.
Geographic	All of our investments are in Australia, and we consider Australia as a low-risk jurisdiction.

### ***Actions to assess and address risk***

We understand the importance of working collaboratively with our employees, joint venture partners, joint venture managers, and the broader industry to combat modern slavery. That is why during our first reporting period we introduced steps to assess and address modern slavery in our operations.

All the unincorporated joint ventures we have interests in are operated by respective joint venture managers, and we are not directly involved in the day-to-day operations. These joint venture managers have the responsibility to operate the coal mines in compliance with the relevant laws and regulation, including any modern slavery legislation if applicable.

To assess the indirect risk due to being a joint venture participant, we have engaged with each of the joint venture managers with respect to modern slavery compliance.

#### **Jellinbah Group Pty. Ltd**

Jellinbah Group Pty. Ltd. controls Jellinbah East Joint Venture and Lake Vermont Joint Venture through its subsidiaries as joint venture managers. Jellinbah Group Pty. Ltd. have introduced processes to identify and manage the risk of modern slavery in their supply chain including the Jellinbah Code of Conduct. Jellinbah Group Pty. Ltd have also assessed their modern slavery risks and indicated that their supply chain had a low potential for such risks.

#### **Glencore Plc**

Glencore Plc controls Hail Creek Joint Venture and Macquarie Coal Joint Venture through its subsidiaries as joint venture managers. Glencore Plc commented that they were committed to prevent the occurrence of modern slavery and human trafficking in their assets and supply chain. They have also established processes to identify and manage the risk of modern slavery in their supply chain, and Supplier Standards that detail the expectations they have for all of their suppliers regarding ethical business practices, safety and health, human rights, labour rights environment and communities.

## **Anglo American Plc**

Anglo American Plc controls Roper Creek Joint Venture through its subsidiary as a joint venture manager. They have commented that they are committed to the highest standards of working, especially when it comes to human rights. Their Metallurgical Coal business had established robust policies and controls which guide their approach to business integrity, preventing modern slavery and forced labour in their business and across their supply chain, and achieving zero harm to people, society and the environment.

After confirming the above responses, we consider that our indirect risk with respect to modern slavery is low and such risk is well handled by the managers.

## **Governance and accountability framework**

Each joint venture representative from Marubeni Coal Pty. Ltd. is responsible for considering modern slavery risks in our coal joint ventures. Each joint venture representative consults from time to time with Compliance Officer and General Manager, Finance and Accounting of the company, who are responsible for monitoring compliance and the preparation of this statement within Marubeni Coal Pty. Ltd.

## **Policies and procedures**

During FY2020, Marubeni Group in Australia including Marubeni Coal Pty. Ltd. introduced a number of policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, including the introduction of a:

- Modern Slavery Policy for our business that establishes our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation.
- Grievance Procedure that supports and encourages employees to raise concerns without fear that their future employment prospects will be adversely affected.

These policies and procedures complement our existing governance framework which is stipulated in the Compliance manual and Marubeni Group governance Policy.

## **Assessing our effectiveness**

We are committed to reviewing the effectiveness of our actions by regularly reviewing our modern slavery processes. Each joint venture representative annually asks joint venture managers to report the modern slavery risks.

## **Consultation and Approval**

Marubeni Coal Pty. Ltd. does not have any owned or controlled entities to be consulted in the preparation of this statement.

Prior to being put to the Board of Marubeni Coal Pty. Ltd. for review and approval, this statement was reviewed by Compliance Officer and General Manager, Finance and Accounting.

This statement was approved by the Board of Marubeni Coal Pty. Ltd. on 23 March 2021.



Tomoharu Kodama  
Managing Director