

Big Ben Holdings Modern Slavery Statement 2026



THE
Bloomfield
GROUP

WE CARE. WE DELIVER.

bloomcoll.com.au



Contents

<i>Our Structure and Reporting Entity</i>	3
<i>Our Approach</i>	4
<i>Our Operations and Supply Chains</i>	5
<i>Governance and Risk Management</i>	7
<i>Looking Forward</i>	8
<i>Modern Slavery Statement Approval</i>	9



Our Structure and Reporting Entity

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".

This Modern Slavery Statement is made by BBH as a reporting entity under the *Modern Slavery Act 2018 (Cth)* (the Act) and on behalf of its related bodies corporate as defined by the Corporations Act 2001.

The Boards of each of the Group Companies comprise one or more of the Directors of BBH. Consultation between the Group Companies required by the Act occurs at BBH's board meetings.

During the Reporting Period Ashtonfields Pty Ltd acquired the Abel Underground and Donaldson Open Cut mine sites which are in care and maintenance.

The following entities are included:

MINING

Northern Waggon Pty Ltd

Bloomfield Collieries Pty Ltd

Rix's Creek Pty Ltd

Goonbri Coal Company Pty Ltd

Curlewis Coal & Coke 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

Ashtonfields Pty Ltd

Biodiesel Industries Australia Pty Ltd

("the Group Companies")



Our Approach

Our approach to managing modern slavery risks is guided by our company values **WE CARE. WE DELIVER**, which underpin our commitment to the safety and wellbeing of our people, our communities and the environment.

Consistent with these values, we believe that all individuals in our operations and supply chains should be free from modern slavery.

This Modern Slavery Statement outlines the process and actions undertaken to assess and address modern slavery risks across the Group's operations and supply chains for the year ending 31 March 2026 (the Reporting Period).



Key Policies and Management Systems within our business that relate to Modern Slavery include:

- › Code of Business Conduct
- › Safety and Health Policy
- › People Policy
- › Risk Management Policy
- › Environment Policy
- › Whistleblower Management System



Our Operations and Supply Chains

OUR OPERATIONS

The Bloomfield Group is an Australian mining and engineering group with operations based in New South Wales. The Group has operated for 89 years and employs hundreds of local people across its mining, engineering and associated businesses. Our company values **WE CARE. WE DELIVER** demonstrate our commitment to safety, wellbeing and the environment.

ABOUT US

- Mining and engineering operations based in NSW, Australia
- Around 560 employees and approximately 170 full time equivalent (FTE) contractors
- Two operating open cut mines in the Hunter Valley
- Engineering and biodiesel business in the Hunter Valley
- Mining, processing and export of thermal and semi-soft coal
- Landholdings in NSW
- 1,100 + suppliers of inputs including maintenance services, plant and equipment, fuel and lubricants, consumables, explosives, components, clothing and PPE

The Bloomfield Group's main business is mining and engineering. Mining activities include the extraction of coal by open cut truck and excavator mining methods, beneficiation of thermal and semi-soft coal and transporting the coal by rail to Port Waratah where the coal is loaded onto vessels for sea-borne transport to our Asian customers. Title to the coal passes to our customers when it is loaded onto the vessels.

Our engineering business provides general engineering solutions across a range of industries including mining, tunnelling and infrastructure, rail and manufacturing.

Biodiesel Industries Australia Pty Ltd manufactures biodiesel for use as fuel and in other industrial applications and provides toll refining services to companies who wish to transform waste oils or surplus feedstock into biodiesel but who do not have in-house refining infrastructure.

Our website bloomcoll.com.au provides further detail on our operations.

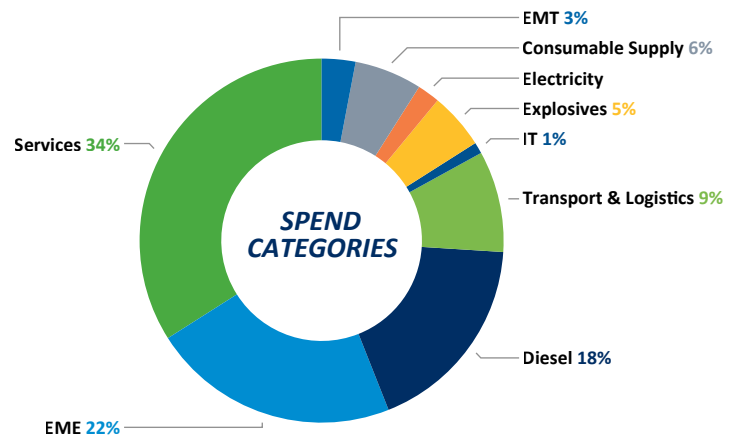
OUR SUPPLY CHAIN

The Bloomfield Group engages approximately 800 suppliers who provide goods and services across various categories including, maintenance services, plant and equipment, fuel and lubricants, explosives, consumables, components, clothing, and PPE.

During the Reporting Period, our main categories of spend were:

- Consumables: including industrial consumables, clothing and PPE, lubricant supply, mechanical and electrical parts supply and hydraulic fittings and hoses supply.
- Diesel
- Electricity
- Earthmoving Equipment (EME) and Earthmoving Tyres (EMT): including heavy mechanical equipment and parts
- Explosives: including drill and blast activities
- IT: including IT equipment and systems
- Logistics and Transport: including rail haulage related to the transportation of coal
- Services: including consultants, maintenance services, human resources and training, waste and environmental services, legal services and farming

SPEND CATEGORIES



The above excludes taxes, licenses, interest, and other government charges

Most of the Group's Companies do not have direct external interfaces or supply chains. Most contracts and purchases are managed and executed by Four Mile Pty Ltd, making its supply chain effectively the supply chain for the Group's Companies. The exceptions are coal sales and rail and port contracts which are executed by Bloomfield Collieries Pty Ltd.

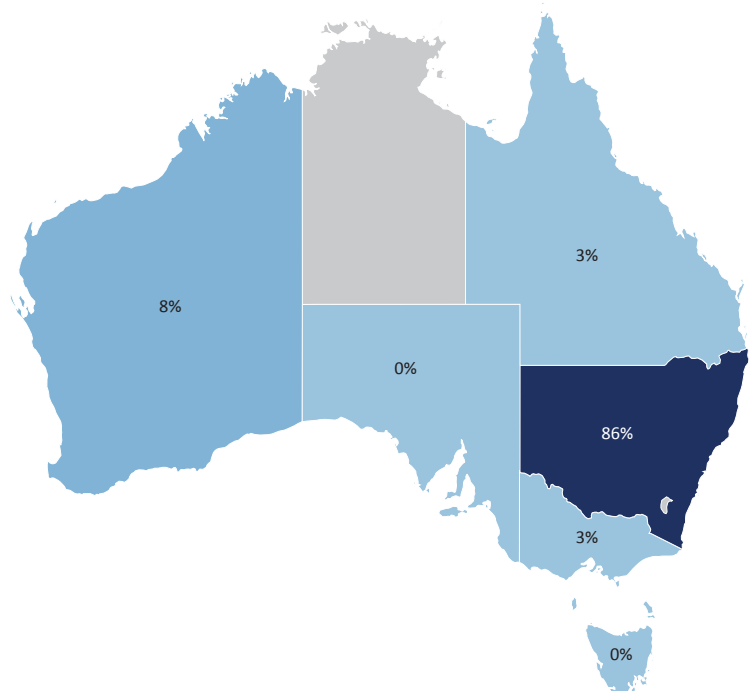
Our operations are primarily based in New South Wales (NSW), Australia, where the Global Slavery Index 2023 estimates a relatively low prevalence of modern slavery (1.6 people per 1,000 population) compared to many other countries.

Where feasible, we prefer to procure goods and services locally. Because of the nature and location of our operations, we assess the risk of modern slavery within The Bloomfield Group's direct operations as relatively low.

Certain high value goods and EME used in the coal mining value chain are supplied by large, globally established manufacturers operating in regulated and commercially competitive markets, and are subject to external scrutiny from customers, investors and regulators.

While these factors may contribute to a relatively lower risk profile in certain areas, the Group recognises that modern slavery risks may still arise within complex and multi-tiered supply chains and continues to assess and manage these risks through its internal risk assessment framework and supplier engagement processes. These factors are considered as part of the Group's broader modern slavery risk assessment framework.

SPEND BY LOCATION





Governance and Risk Management

RISK ASSESSMENT AND MITIGATION

During the Reporting Period, The Bloomfield Group's cross-functional Modern Slavery Risk Review Committee continued to oversee and coordinate our modern slavery response. This included reviewing relevant guidance and best practice, considering any changes to the Group's operations and supply chains, and undertaking the annual modern slavery risk review.

There were limited changes to the Group's structure, operations or supply chains during the Reporting Period, and no changes were identified that materially impacted the Group's modern slavery risk profile.

As part of the annual review process, the Group assessed the suitability of the MSS risk assessment tool used in the previous reporting period to conduct a bulk supplier assessment. This review considered supplier feedback, including the potential cost and productivity implications for small and medium enterprises when responding to compliance requirements imposed by larger organisations. Because of concerns regarding the administrative burden placed on suppliers, and the reliability and practical value of the data outputs generated by the tool, the MSS risk assessment tool was not used during the Reporting Period.

Instead, the Group utilised its established internal risk assessment framework, which continues to form the foundation of its modern slavery risk management approach, to identify, assess and monitor modern slavery risks across our operations and supply chains.

The Group will continue to review the suitability of risk assessment tools as part of its evolving approach to modern slavery risk management. Under this framework, modern slavery risks are assessed by considering a range of relevant indicators, including the nature of goods and services procured, sector and industry risk, geographic risk factors, and workforce characteristics associated with the delivery of those goods and services. This enables the Group to identify areas of elevated risk and prioritise engagement and due diligence activities accordingly.

The Group continues to maintain controls that support the identification and mitigation of modern slavery risks across its operations and supply chains. These include organisational values, policies and management systems, engagement with local suppliers, and compliance with relevant Australian legislation relating to workplace safety, employment and industrial relations, and environmental protection legislation.

Insights obtained through the previous supplier assessment process were also consolidated to identify actions that may assist suppliers in strengthening their own modern slavery risk management practices, including employee training on modern slavery risks and the implementation of relevant risk management policies and vulnerability assessments.

Oversight of these processes remains with the Modern Slavery Risk Review Committee, supporting continuous improvement in how modern slavery risks are identified, assessed and addressed across the Group's operations and supply chains.

ACTIONS TAKEN DURING THE REPORTING PERIOD

During the Reporting Period, the Group implemented a number of additional measures aimed at strengthening the identification and mitigation of modern slavery risks. These included reviewing training needs and conducting a gap analysis in frontline roles such as purchasing and procurement, consolidating the supplier base in the personal protective equipment (PPE) and consumable supply category, continuing to collect Manufacturer Compliance Statements from clothing and PPE suppliers, and reviewing policies and systems related to human rights. Updates were also made to training and apprentice management systems to ensure that potential vulnerabilities associated with unskilled, temporary or seasonal labour are appropriately considered.

ASSESSING EFFECTIVENESS

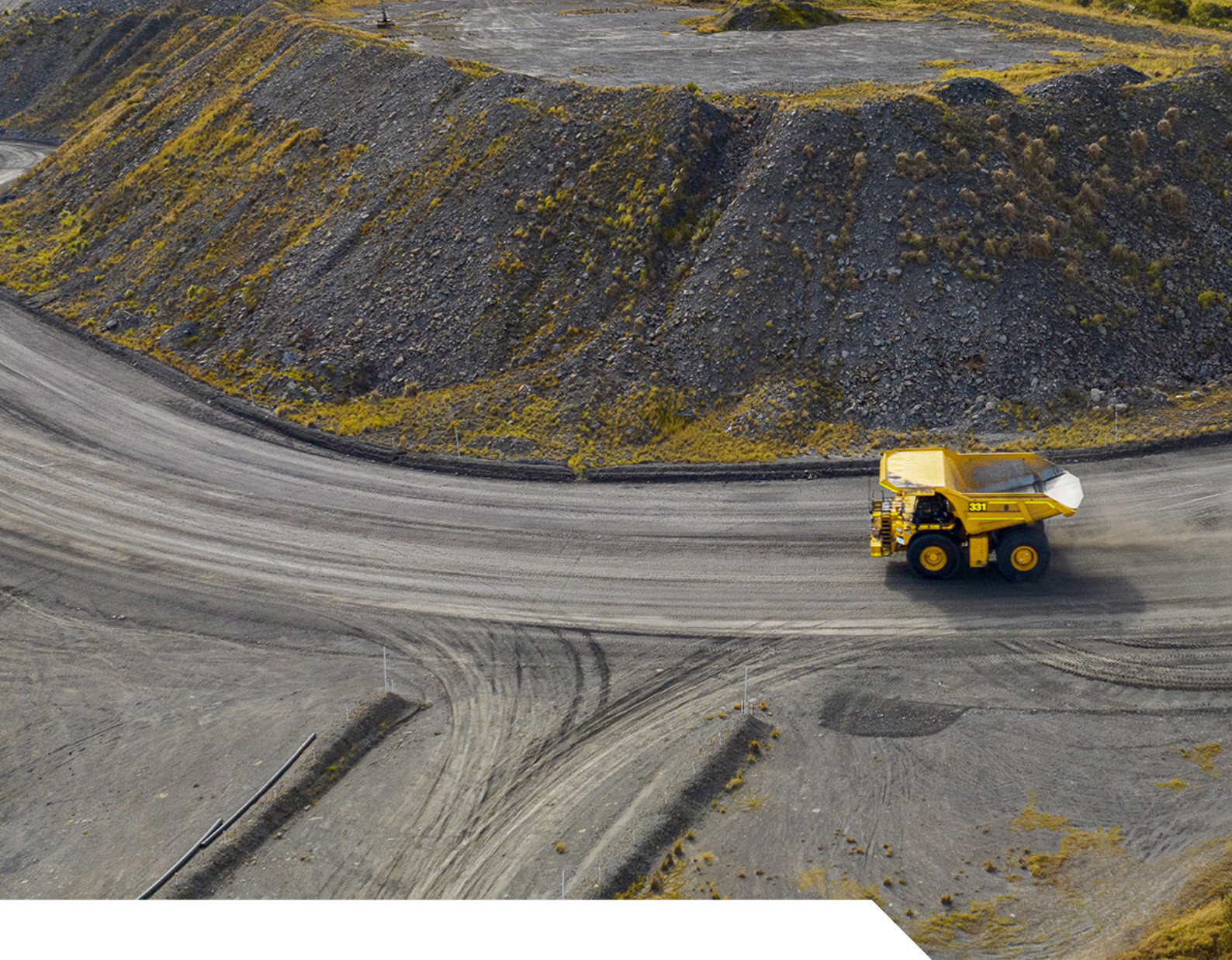
The effectiveness of current and future controls implemented is assessed by The Bloomfield Group on an ongoing and annual basis. This assessment is managed by the Modern Slavery Risk Review Committee, a management-level body that prepares the Group's Modern Slavery Statement for review by executive directors and subsequent approval by the Board. The membership of the Committee may vary each year depending on priority topics, as outlined in the risk assessment process.



Looking forward

The Bloomfield Group will continue to engage with its suppliers and their supply chains to promote awareness of modern slavery risks and encourage the adoption of appropriate risk management practices.

The Group will also continue to monitor developments in relevant guidance and emerging best practice and refine its approach to modern slavery risk identification, supplier engagement and risk management as part of its commitment to continuous improvement.



Modern Slavery Statement Approval

As required by the Act, this statement was reviewed and approved by the Board of Big Ben Holdings Pty Ltd as the principal governing body of the reporting entity and signed by its Chair.

A handwritten signature in blue ink, appearing to read 'John Richards', is written over a horizontal line.

John Richards
Chair

24 April 2026



THE
Bloomfield
GROUP

bloomcoll.com.au

WE CARE. WE DELIVER.