

Big Ben Holdings

Modern Slavery Statement 2021



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. Our Modern Slavery Statement 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 year ending 31 March 2021 (YEM21).



Key Areas of Action

- ✓ Established a dedicated team to manage the Group's COVID-19 response and implemented a range of measures to maintain the health and safety of our workforce, the resilience of our business and the businesses that we work with whilst mitigating potential modern slavery risk
- ✓ Established performance and compliance reviews with relevant suppliers & focused on regular engagement
- ✓ Promoted awareness of modern slavery requirements amongst key staff including Modern Slavery Risk Review Committee and Board members
- ✓ Ongoing review and continuous improvement of Policies and Systems related to human rights
- ✓ Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review



Our COVID-19 Response

Dealing with COVID-19 has presented daily challenges for everyone. The Group recognised that the global pandemic had the potential to increase modern slavery risks within our industries generally.

The Group prioritised maintaining the health and safety of our workforce, building the resilience of our business, and the businesses we work with, to put us in the strongest possible position to navigate our way forward safely.

The Group established a dedicated team to manage our COVID-19 response including the development of detailed emergency response plans aimed to protect the health and safety of workers.

We engaged regularly with our suppliers to understand the impact of COVID-19 on their businesses and we continue to work with them to provide support where we can. We established a dedicated team to manage critical suppliers and categories to support our operations, including the sourcing of personal protective equipment (PPE).

We maintained our relationships with existing screened suppliers including using existing NSW based suppliers to obtain additional PPE supplies. In recognition that COVID-19 was likely to have a financial impact on our suppliers, which could have increased modern slavery risks, we reduced our trading terms from 30 days to 7 days for a period of 3 months to improve our suppliers' cash flow and planning certainty.

This strategy allowed us to mitigate potential modern slavery risk.



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.

There has been limited change to our structure, operations and supply chains during the reporting period and no negative impact on our modern slavery risk profile.

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 700 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's cross functional Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance and conducting our annual modern slavery risk review across our operations and supply chains. The Committee considered any changes that occurred throughout 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 risk review determined that the modern slavery risk across the Group's operations and supply chains remains low. The Group maintains its operational base in NSW. 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. We have continued to obtain Manufacturer Compliance Statements from our clothing and PPE suppliers which was identified as by our initial risk review as a strategy to mitigate potential modern slavery risk. This aligns with the Global Slavery Index report that identifies garment supply as one of the top five (5) imported products at risk of modern slavery.

The risk review process identified that we continue to 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;

- ✓ Established dedicated team to manage the Group's COVID-19 response and implemented a range of measures to maintain the health and safety of our workforce, the resilience of our business and the businesses that we work with whilst mitigating potential modern slavery risk
- ✓ Developed detailed emergency response plans aimed to protect the health and safety of workers
- ✓ Maintained our relationships with existing screened suppliers including using existing NSW based suppliers to obtain additional PPE supplies required for our COVID-19 response
- ✓ Reduced our trading terms from 30 days to 7 days for a period of 3 months to improve our suppliers cash flow and planning certainty
- ✓ Established performance and compliance reviews with relevant suppliers & focused on regular engagement
- ✓ Promoted awareness of modern slavery requirements amongst key staff including Modern Slavery Risk Review Committee and Board members
- ✓ Ongoing review and continuous improvement of Policies and Systems relating to human rights
- ✓ Modern Slavery Risk Review Committee continued to drive the Group's modern slavery response including reviewing best practice guidance notes and conducting our second annual modern slavery risk review

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 which reports 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 Board on an annual basis.

Looking Forward

Whilst the Group has identified that the modern slavery risk across our operations and supply chains is low, we recognise that efforts in relation to reducing modern slavery require us to continuously review and improve our practices.

With this in mind, the Group will continue to review, assess and address modern slavery risks through our Modern Slavery Risk Review Committee.





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

13 May 2021





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