



Policy

Applicability

This Policy applies to all Coal Services Pty Limited and its subsidiaries including, but not limited to, Coal Mines Insurance Pty Ltd and Mines Rescue Pty Limited (**Coal Services**) employees, officers and volunteers (**Employees**) and to any contractors, agency workers, consultants and any other third party representatives (**Suppliers**) performing work or providing goods or services on Coal Services sites or on behalf of Coal Services in any capacity.

Authority to amend

Any amendments to this Policy must be approved by the Managing Director/CEO.

Policy statement

Coal Services is subject to the *Modern Slavery Act 2018* (Cth) that commenced operation on 1 January 2019. The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement. Our first annual statement is due on 31 December 2020, however due to COVID-19 it has been extended by the Australian Government, Department of Home Affairs, to 31 March 2021.

Modern slavery refers to a range of serious forms of exploitation, including forced labour, debt bondage, human trafficking, and slavery.

Coal Services is committed to limiting the risk of modern slavery within its own business; within its supply chains; or through any other business relationship and in only working with suppliers that are aligned to our values.

This Policy is supported by the Coal Services Modern Slavery Procedure, which follows and is intended to give a clear and consistent understanding of the implementation of this Policy.



Review of the Policy and Procedure

This Policy and Procedure will be subject to continuous review by the Head of Risk, Compliance & Legal and remains in force until such time as it is withdrawn or amended, by way of undertaking a review and an updated version issued. As a guideline, the Policy and Procedure should be reviewed by the Head of Risk, Compliance & Legal every two years.

Employees are required to comply with this Policy and related Procedure as a condition of employment. Any Employee who does not comply with this Policy and Procedure may be subject to disciplinary action, up to termination of employment.

Employees wishing to discuss any aspect of the Policy or Procedure should contact the Head of Risk, Compliance & Legal.

Policy and Procedure approved:

Lucy Flemming
Managing Director/CEO

20 May 2020



Procedure

Table of Contents

1. Purpose and Scope.....	3
2. Definitions	4
3. Actions and responsibilities.....	4
3.1 Board and Risk Management Committee.....	4
3.2 Managing Director/CEO.....	4
3.3 Head of Risk, Compliance & Legal	4
3.4 Procurement and Contracts Manager	5
3.5 Internal Audit	5
3.6 Employees and Suppliers	5
3.7 General Management Team (GMT)	5
3.8 Managers and supervisors	5
4. Contract Management and Monitoring	6
4.1 Compliance	6
5. Procurement of Goods and Services.....	6
6. Annual Modern Slavery Statement	7
7. Compliance.....	7
8. Communication and Awareness	7
Schedule 1: References	8

1. Purpose and Scope

The purpose of this procedure is to support the above Coal Services Pty Limited Modern Slavery Policy (**Procedure**).

The purpose of this Policy and Procedure is to:

- a) limit the risk of Modern Slavery occurring within Coal Services, its supply chain or in any other business relationship;
- b) ensure compliance with the *Modern Slavery Act 2018* (Cth) (**the Act**);

Coal Services expects its Suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.



We have a relatively simple supply chain that includes the purchase of products and services needed for the businesses day-to-day operations including office supplies, health care supplies, employment and training of employees, external legal advice, leasing of office space, IT infrastructure and support services and travel. Coal Services has various policies in place that support our day-to-day operations to ensure all employees and suppliers meet Coal Services values.

2. Definitions

Supplier	Contractors, agency workers, suppliers, consultants and any other third-party representatives, performing work or providing goods or services on Coal Services sites or on behalf of Coal Services in any capacity.
Employee	Employees, officer and volunteers performing work or providing services on Coal Services sites or on behalf of Coal Services.
Modern Slavery	The <i>Modern Slavery Act 2018</i> (Cth) (Act) defines slavery into eight areas: human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment and child labour.
Contract Owners	Employees responsible for Supplier contracts.

3. Actions and responsibilities

3.1 Board and Risk Management Committee

The Board is responsible for approving and signing the annual Modern Slavery statement on the recommendation of the Risk Management Committee.

3.2 Managing Director/CEO

The Managing Director/CEO is responsible for approving this Policy and Procedure and ensuring adequate policies and procedures are in place to ensure the Policy and Procedure is effectively implemented.

3.3 Head of Risk, Compliance & Legal

The Head of Risk, Compliance & Legal has overall responsibility for the implementation and management of this Procedure and will:

- Provide training to Contract Owners and other employees involved in sourcing goods and services in relation to obligations under this Procedure and the Act;
- Ensure all applicable contracts have clauses covering modern slavery as required by the Act;
- Oversee with the Procurement and Contracts Manager that due diligence and an assessment on suppliers is conducted to ensure their compliance with the Act;
- Provide legal advice in relation to a suspected breach of the Act or this Policy and Procedure;
- Provide risk advice in relation to risk associated with the respective suppliers;



- Prepare the annual Modern Slavery statement for approval;
- Assume the day-to-day responsibility for implementing this Policy and Procedure;
- Monitor the use and effectiveness of this Procedure;
- Deal with any queries about this Procedure;
- Ensure that the audit internal control systems and procedures are effective in countering Modern Slavery.

3.4 Procurement and Contracts Manager

- Monitors key suppliers in consultation with Contracts Owners regularly to ensure they maintain compliance with the Act;
- Ensures all applicable contracts have clauses covering modern slavery as required by the Act as advised by the Head of Risk, Compliance & Legal;
- Undertakes the assessment of suppliers, in consultation with Contract Owners and based on Contract Owners preliminary due diligence, to ensure the suppliers' compliance with the Act;
- Assists the Head of Risk, Compliance & Legal with the preparation of the annual Modern Slavery statement;
- Assists the Internal Audit department with the annual audits on key suppliers to monitor compliance with the Act.

3.5 Internal Audit

Internal Audit in consultation with Risk, Compliance & Legal is responsible for conducting risk-based audits annually on key suppliers to monitor compliance with the Act. The annual Modern Slavery statement requires reporting the risks of Modern Slavery practices in the operations and supply chains of Coal Services with actions reported to address the risks including due diligence undertaken.

3.6 Employees and Suppliers

Employees and Suppliers have the responsibility to:

- Familiarise themselves with this Policy and Procedure;
- Comply with this Policy and Procedure;
- Assist in preventing, detecting and reporting modern slavery if it is encountered.

3.7 General Management Team (GMT)

The GMT are responsible for the implementation of this Policy and Procedure and obligations throughout their business units.

3.8 Managers and supervisors

Managers/Supervisors have the responsibility to ensure their Employees understand and comply with this Policy and Procedure are given adequate training on it and the issue of Modern slavery in supply chains.



4. Contract Management and Monitoring

4.1 Compliance

This Policy and Procedure governs Coal Services compliance with the Act. Coal Services will meet the requirements under the Act as follows:

- a) In the procurement of goods and services;
- b) Through contract management and monitoring of key suppliers;
- c) The preparation and submission of the annual Modern Slavery statement.

Particular steps for compliance include:

1. Assessing the potential Modern Slavery risks in Coal Services operations and supply chains with emphasis on high risk geographical locations and business transactions;
2. Developing and reviewing Coal Services policy on Modern Slavery in operations and supply chains;
3. Developing training for Employees in Modern Slavery requirements;
4. Preparing to conduct due diligence on local and global supply chains;
5. Reviewing supplier contracts to ensure they contain terms that are consistent with the Act;
6. Taking steps to address any potential Modern Slavery risks identified; and
7. Setting up a program to measure effectiveness through performance monitoring.

Coal services will continue to monitor current suppliers and will ensure future suppliers are aware of their obligations under the Act.

Coal Services expects all who have, or seek, a relationship with the Coal Services to familiarise themselves with this Policy and Procedure, to act in a way that is consistent with Coal Services values and to comply with this Policy and Procedure, or to take verifiable steps towards compliance with it.

5. Procurement of Goods and Services

Coal Services aims to identify the risk of Modern Slavery occurring within its supply chain or business operations. Coal Services endeavours to support human rights through the supply chain by encouraging Supplier practices that actively identify, assess and manage human rights issues.

Coal Services principles for suppliers articulate expectations for suppliers, including that suppliers respect human rights, provide safe, fair and ethical working conditions; seek opportunities to improve environmental performance; promote supplier diversity; and to not use child labour or any form of forced or involuntary labour under any circumstance.

All key Supplier contracts must contain provisions in accordance with the Act including:

- Compliance with the Act;
- Reporting obligations;
- Attestation that the supplier complies with the Act;



- Details of the actions taken by the supplier to manage the Modern Slavery risks in their supply chains; and
- A requirement to take reasonable steps to ensure there is no Modern Slavery in its supply chains.

Coal Services also includes requirements in Request for Tender documents compliance with the Act.

6. Annual Modern Slavery Statement

The Act requires that an Annual Modern Slavery Statement (**Statement**) be prepared and approved for each financial year. The Head of Risk, Compliance & Legal is responsible for the preparation of the Statement, which must be approved by the Coal Services Board on the recommendation of the Board Risk Management Committee and signed by the Chairperson of the Board. The Statement must be submitted to the Department of Home Affairs by 31 December each year. The Australian Border Force will then publish the Statement on their online central register.

7. Compliance

- All Employees and Suppliers must read, understand and comply with this Policy and Procedure. Everyone working at Coal Services is responsible for preventing, detecting and reporting Modern Slavery if it is encountered.
- If anyone becomes aware of or suspects that modern slavery is taking place, they must immediately notify the Head of Risk, Compliance & Legal. This applies whether or not the suspected Modern Slavery involves Coal Services or one of its Suppliers
- A breach of this Policy and Procedure by an Employee may lead to disciplinary action being taken in accordance with the Coal Services disciplinary process.
- Coal Services may terminate its relationship with Suppliers if they breach this Policy and Procedure or may look at methods of preventing further engagement with the Supplier.
- Coal Services has a whistle-blower policy and an external hotline for Employees and Consultants to use if there is a suspected breach of the Act.

8. Communication and Awareness

All Employees and Consultants will be notified of this Policy and Procedure and it will be published on the Coal Services website. All relevant Employees will receive training as appropriate from time to time.



Schedule 1: References

Internal

The Modern Slavery Policy and Procedure works in conjunction with the following Coal Services documents

- Protected Disclosure Policy and Procedure
- Code of Conduct
- Disciplinary Policy and Procedure
- Procurement Policy and Procedure

Legislation

- *Modern Slavery Act (2018) (Cth)*

Other references (if applicable)

- n/a