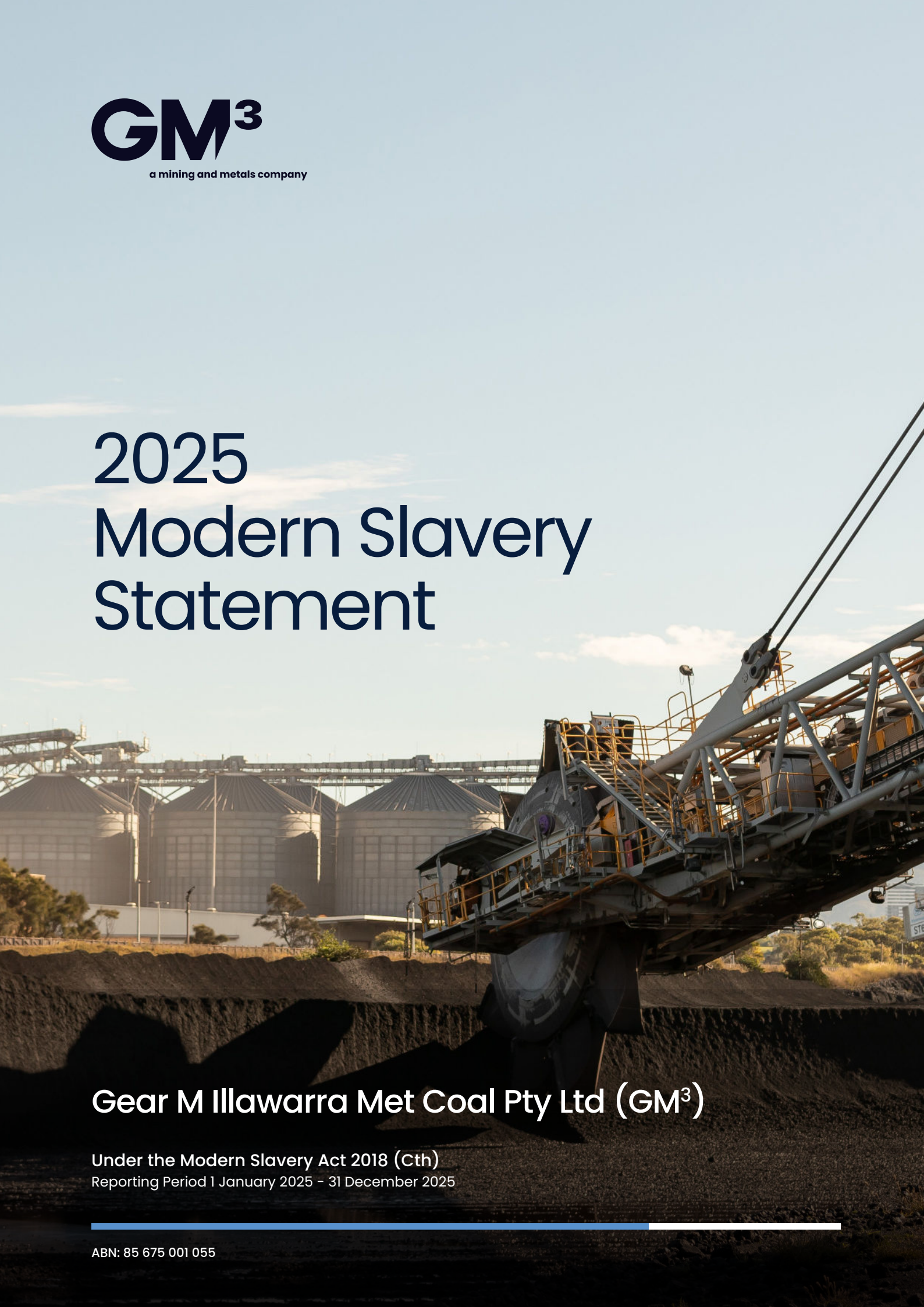
GM³

a mining and metals company

2025 Modern Slavery Statement



Gear M Illawarra Met Coal Pty Ltd (GM³)

Under the Modern Slavery Act 2018 (Cth)

Reporting Period 1 January 2025 - 31 December 2025

ABN: 85 675 001 055

Board Approval and Authorised Signature

In accordance with applicable provisions of the *Modern Slavery Act 2018*, the Board of Gear M Illawarra Met Coal Pty Ltd approved this Modern Slavery Statement on 26 June 2026.

The contents of this Statement have been reviewed as accurate and signed by Peter Baker, Chief Executive Officer, a duly authorised person under the Act on 26 June 2026.

Peter Baker
Chief Executive Officer
GM³

Contents of this Statement

Part One: 03
Corporate Structure, Operations and Supply Chains

Part Two: 05
Developing our approach to identifying, assessing and addressing potential areas of modern slavery risk

Part Three: 08
Measuring effectiveness and looking forward

Quick Reference Guide to Reporting Criteria

Section 16(1) Reporting Criteria	Part of this Statement where primarily described
1,2,6 & 7	Part One
3 & 4	Part Two
5 & 8	Part Three

Part One

Corporate Structure, Operations and Supply Chains

This is the second Modern Slavery Statement for Gear M Illawarra Met Coal Pty Ltd, trading as GM³, ABN 85 675 001 055 (referred to in this Statement as 'GM³', 'we' and 'our'). The reporting period covered by this Statement is the 2025 calendar year.

1.1 Our Core Business Operations

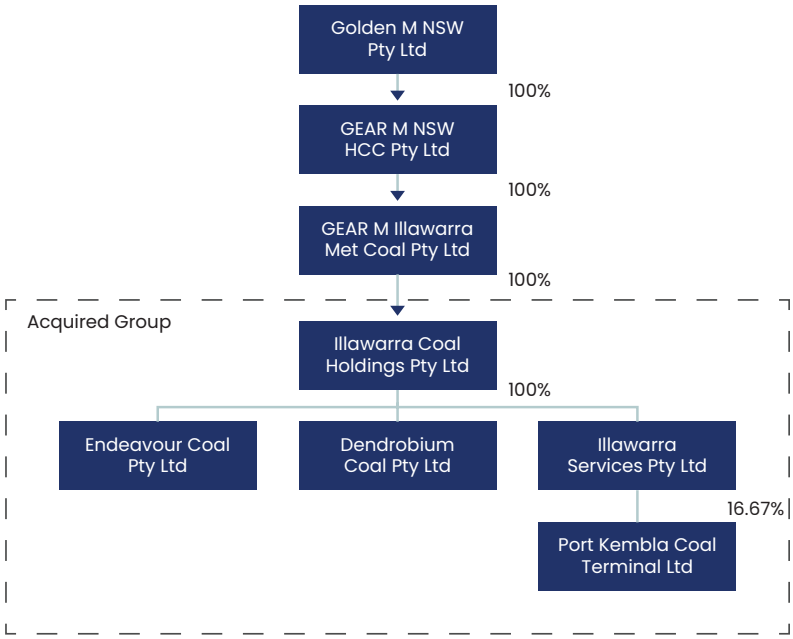
Based in the southern coalfields of NSW, GM³ operates a premier hard coking coal complex and holds equity and management rights in the Port Kembla Coal Terminal. We operate two underground mines- Appin Mine in the Macarthur area (operational since 1962) and Dendrobium Mine in Mount Kembla (mining since April 2005). We are committed to being a long-term, active and responsible member of the Illawarra community.

GM³ is proud to support the Australian steel industry and the local communities proximate to our mine sites, including through the career and employment opportunities that we provide. During the reporting period, we significantly increased our total workforce (up from 1,271 in 2024) to 1,556 as we amended our labour strategy and subsequently reduced our contracted labour. The overwhelming majority of these staff (i.e. approximately 98%) are engaged on a full-time employment basis, with all of the attendant employee rights and protections.

1.2 Corporate Structure and Reporting Entity History

The 2025 calendar year is the reporting period covered by this Statement and marked the first full year of GM³ being a reporting entity under the *Modern Slavery Act 2018*. Details of the acquisition of Illawarra Coal Holdings Pty Ltd from South32 Ltd, the formation of GM³, and our commencement in the latter half of 2024 are described in last year's Statement.

GM³'s principal governing body is its Board of Directors. The corporate ownership structure remains unchanged as per the below flow chart:



GM³ acknowledges the Act's requirement that a Statement describe the process of consultation with any entities that the reporting owns or controls. Our consultation process, including in relation to the contents of this Statement and our overall anti-slavery response, is led by GM³'s Category Management team, which is responsible for majority of spend, including through the implementation of a consistent supply framework and procurement standards. In preparing this Statement, relevant personnel across GM³'s entities were consulted on matters including modern slavery risks, supplier engagement practices, and the reporting criteria. This input has informed the development of GM³'s anti-slavery response and the descriptions contained in this Statement. Some entities within the group are non-operational and do not employ staff or procure goods and services.

1.3 Key Characteristics of Our Supply Chains

Our first-tier supplier engagement throughout the reporting period involved 937 unique companies. As described in our inaugural Statement, over 99% of GM³'s suppliers are Australian-based companies.

GM³'s supply chain is characterised by a predominantly domestic supplier base, with a limited number of international suppliers concentrated in technology and business services.

Direct suppliers cover a diverse spectrum of Australian businesses, with key sectors and industry categories including:

- Accommodation and hospitality services
- Building materials
- Construction services
- Computer products, services, and related IT software and hardware
- Educational providers with staff training, etc
- Industrial chemicals and mining explosives
- Labour hire services
- Motor vehicles – including specialist mining transportation
- Office stationery, consumables and other equipment (including furniture)
- Other / ancillary business services (including financial, legal, insurance, business advisory and other professional services)
- Printed materials (e.g. signs and banners)
- Real estate and property management services
- Recreational, health and social services
- Technical machinery and equipment (including precision equipment and electrical machinery but excluding motor vehicles)
- Textiles and clothing (corporate uniforms and equipment)
- Telecommunication
- Transportation services, including railway
- Utilities

The relatively few international companies that we have direct supplier relationships with, as with our first (partial) reporting period, include computer-related services located in the United States (4 suppliers), Sweden and Canada (both a single supplier) and a business-services supplier based in Singapore.

Our overall core procurement activity has remained consistent since our last reporting period. Two notable developments since last year were:

- the sourcing of 12 key mining materials/products from an Australian importer, as an alternative to procurement via a local distribution network (which eliminates a potential tier in the overall supply chain); and
- the winding up of transitional reliance on various consultants and other professional service providers that engaged for the process of the underlying company acquisition from South32 and establishment as a new and separate business operation.

1.4 Workforce Characteristics

As noted above, GM³ direct labour workforce increased in 2025, whilst overall numbers remained flat year on year. The following table depicts the allocation of employees across individual key business areas within our team.

Business Team	Individual Staff Numbers
Administrative (corporate services)	30
Professional / Technical (engineering services, etc)	461
Non-Technical (labour e.g. miners, trades, construction)	1,026
Management	53

Part Two

Developing our approach to identifying, assessing and addressing potential areas of modern slavery risk

No actual or suspected incidences of modern slavery practices in our operations or supply chains were reported during the reporting period.

Throughout our first full reporting period, GM³ has continued to concentrate on building a solid, data-driven approach to identifying and assessing key areas of potential modern slavery risk.

As foreshadowed last year, our formation of an appropriate modern slavery response framework, includes the progressive development and implementation of appropriate policies and procedures that are applicable across our entire business.

2.1 Supply Chains

Building upon the initial phases of comprehensive risk assessment that we described in last year's inaugural Statement, a key action has been the analysis, by external subject matter experts, of our complete procurement spend data in relation to the 937 unique vendors that GM³ engaged in 2025 year.

Our independent consultant's comprehensive baseline for identifying and assessing modern slavery risk incorporates a unique supply chain mapping process that is underpinned by a balanced, global Multi-Regional Input-Output (MRIO) dataset. This links supply chain data from 208 countries, and 37,318 unique industry/country combinations. The applied data universe comprises over 35,000 local industries categories, which represents more than 98% of global GDP. The MRIO is regularly updated and draws from the most comprehensive and credible global data inputs available, including the United Nations' (UN) System of National Accounts; UN COMTRADE databases; Eurostat databases; the Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and official statistical data from many national agencies worldwide, including the Australian Bureau of Statistics.

The synthesis of global economic supply chain data is overlayed, via a proprietary algorithm, with the leading research and estimates of modern slavery incidences at the national and industry levels, including the Walk Free Foundation's Global Slavery Index; the International Labour Organisation's Global Estimates of Modern Slavery; official reports published by the United States on International Child Labour, Forced Labour and Human Trafficking, and our internally developed database of modern slavery risk factors by country and sector.

The resulting output from the risk assessment includes a comprehensive breakdown of areas of (relatively) elevated risk in our complete value chain, down to the tenth (10th) tier, grouped on a sector/country basis, and broken down into practical categories such as total overall spend and ranked sectoral risk.

A defining characteristic of the comprehensive supply chain assessment is that, across multiple different key sectors for our direct suppliers, the most elevated risks are situated deep in the procurement chain (i.e. 2nd, 3rd and even deeper tiers). We recognise that this means that a longer-term due diligence activity will, in order to have maximum practical impact, need to focus heavily on improving transparency and supplier-specific information that can press well beyond our direct procurement partners. Capacity-building and strategic partnership will likely form a key part of a continuous improvement approach.

Identified deeper-tiered risk areas that we have flagged as priorities for potential future due diligence include key material inputs and manufacturing stages required for the production of key mining equipment and computer/electronic systems.

Key mining equipment may carry higher, inherent modern slavery risk, typically in deep tiers, due to common inputs including steel, aluminium, rubber and new technology power sources (e.g. high-tech batteries and power systems).

GM³ also relies upon a range of professional services. Almost all businesses of this kind have inherently high reliance on computers, digital devices, software, and other electronics products.

Within the manufacturing sector, the electrical and electronics industries are identified as particularly high risk, particularly due to the prevalence of vulnerable migrant workers and use of recruitment agents and labour contractors[1]. Multiple high-risk raw materials are essential to electronics and related componentry used in machinery and equipment, including conflict minerals, cobalt, aluminium and lithium.

Conflict minerals include derivatives of columbite-tantalite (coltan), cassiterite and wolframite, being primarily tin, tantalum, tungsten and gold (collectively, '3TG' minerals), sourced from the Democratic Republic of Congo ('DRC') or adjoining countries ('covered countries'). These minerals are used in electronic componentry, specifically in the production of capacitors, resistors, transistors, connectors, circuitry diodes, inductors, microprocessors, light emitting diodes ('LEDs'), memory chips and batteries[2].

2.2 Operations

GM³ operations are exclusively Australia-based. Beyond this, our two mines are located in a relatively small geographical area within the country, which is far less remote and otherwise has reduced exposure to inherent worker vulnerabilities, even relative to the relatively lower-risk national mining context (compared to inherently elevated risks in the global mining sector). As previously reported, most of our team members who work in underground roles (Operators, Tradespeople and Mining Supervisors) continue to be covered under Enterprise Agreements and the highly protective and regulated Australian workforce environment.

GM³ has continuing engagements with several reputable Australian third-party labour hire providers to supplement our directly employed Operations team. Specialised labour hire providers are focused on the delivery of specific project work or services requiring ancillary skills to coal extraction. Our use of third-party labour hire companies is for highly specialised and technical mining services. No foreign workers are recruited using third-party labour hire services.

This year, GM³ also undertook a consolidation of supplementary labour hire arrangements, reducing the number from six to one. As part of this process, GM³ conducted due diligence on all prospective labour hire providers, with the existence of a modern slavery compliance being one of the material considerations. The appointed provider is a reporting entity under the Act and publishes its own modern slavery statement, providing an additional layer of assurance with respect to GM³'s labour hire.

[1] https://respect.international/industry/manufacturing/
[2] https://www.z2data.com/insights/sources-of-conflict-minerals-in-the-electronic-industry

2.3 Our Developing Governance, Policy & Due Diligence Framework

In last year's Statement, we described the initial suite of policies and procedures that GM³ implemented in the initial months following the commencement of our business, including:

- Code of Business Conduct
- Modern Slavery Industry Self-Assessment Questionnaire
- Vendor Admin Form

These policies and procedures continue to be actively implemented throughout our day-to-day business activities. Instead of repeating a summary of these initiatives (which we described in last year's Statement), we are pleased to report that, as foreshadowed, our inaugural Modern Slavery Policy was developed, approved by our Board and implemented during 2025.

2.3.1 Supplier Due Diligence

GM³ considers that we are still in the foundational phase of compiling baseline information for supplier due diligence. This includes targeted collection of supplier information through Vendor Administration Forms, and our development of a centralised dataset to support supplier risk segmentation.

GM³'s Vendor Admin Form continues to be a source of direct supplier information that contributes to a continuously improving data baseline for monitoring areas of potentially elevated modern slavery risk. Key insights from direct supplier engagement via the Vendor Admin Form include:

- Supplier adoption of policies relating to labour standards, human rights, and ethical conduct
- Use of subcontracting and third-party labour arrangements
- Geographic exposure of key supply chain inputs
- Alignment of suppliers with internationally recognised standards where applicable

2.3.2 Policy & Governance Developments

The following is a snapshot of some key features of the GM³'s Modern Slavery Policy:

- Confirming our organisation-wide zero-tolerance position on all forms of modern slavery.
- Establishing and describing multiple specific commitments across all key pillars of a holistic anti-slavery framework, including:
  - *Risk Assessment and Due Diligence*
  - *Training and Awareness*
  - *Grievance (Reporting Mechanisms) and Remediation*
  - *Monitoring and Review*

Day-to-day responsibility of our modern slavery risk mitigation continues to be primarily managed by our Category Management Team.

Part Three

Measuring effectiveness and looking forward

GM³'s development of a formal framework to measure the effectiveness of our modern slavery risk assessment and mitigation measures has not yet been completed. Strategic deferral occurred as a part of the broader transition to a new supplier and vendor management system, and a multi-faceted review of the tools and procedures in 2026.

During the reporting period, we believe that effective progress has been achieved across several key pillars, including:

- Implementation of our Modern Slavery Policy
- Developing and improving supplier onboarding and data collection processes
- Completion of supply chain risk assessment

Beyond this, we will deliver targeted training and capability-building initiatives to upskill the category management and purchasing teams, equipping them with the knowledge and tools to identify, assess and address modern slavery risks within our operations and supply chains.

As an interim measure, and to promote transparency between the foreshadowed plans touched on in our first Statement with completed actions during 2025, the following table provides a relevant summary and brief explanation.

Foreshadowed action in CY24 Statement	Part of this Statement where primarily described
Continue to implement recently developed policies and procedures to address modern slavery risk issues within GM³'s operations and supply chain.	**Completed**.
Explore the onboarding of a new supplier/vendor management platform (specifically tailored to include inbuilt modern slavery risk considerations).	**Completed.**
Training of Category Management and Purchasing teams in use of our external consultant's risk assessment platform to more effectively assess and monitor the risk profile of different sectors and individual suppliers.	**In progress and ongoing**. Ad hoc learning has occurred through the continued use of the SAAS platform operated by our external consultants. More structured formal training will be integrated into broader modern slavery training initiative for 2026 (see below).

Throughout 2026, GM³ plans to continue to improve in building a solid foundation for a long-term modern slavery response framework, with planned focus areas including:

- Implementation and integration of our **SAP-based analytics platform** which will allow segmentation and categorisation of the spend base. We anticipate that advancements in our ability to effectively respond to modern slavery risk issues will be achieved through improved capacity to:
  - categorise and assess our entire supplier base;
  - isolate and focus on suppliers linked to known higher-risk sectors (e.g. electronics); and
  - prioritise and coordinate due diligence activities.
- Implementation of a targeted modern slavery training session for GM³'s category management and purchasing teams. The session will be tailored to GM³'s specific risk profile and current maturity level. The focus will be on increasing organisational awareness about key modern slavery risk areas, reporting good practice, and integrating effective mitigation into business-as-usual practices in procurement and ongoing supplier engagement.

www.gm3.au