

YN ENERGY PTY LTD  
Modern Slavery Statement 2025

Table of Contents

YN Energy Modern Slavery Statement .....2

1. Reporting Entity .....2

2. Governance and Accountability .....2

3. Structure Operations and Supply Chains .....2

4. Risks of Modern Slavery in our Operations and Supply Chains .....4

5. 2025 Modern Slavery Risk Findings .....4

6. Actions to Assess and Address Modern Slavery Risks .....6

7. Measuring Effectiveness of Our Actions.....7

8. Consultation.....8

9. Approval Process .....8

## YN Energy Modern Slavery Statement

### 1. Reporting Entity

This Modern Slavery Statement is made by YN Energy Pty Ltd (YN Energy) ACN 611 962 451 in accordance with the Modern Slavery Act 2018 (Cth).

This Statement is a single-entity statement made by YN Energy Pty Ltd for the reporting period 1 January 2025 to 31 December 2025. This Statement outlines the actions taken during the 2025 reporting period to assess and address modern slavery risks in YN Energy's operations and supply chains.

YN Energy does not currently own or control any other reporting entities for the purposes of subsection 16(1) of the Modern Slavery Act 2018 (Cth). Accordingly, no separate controlled-entity consultation was required. YN Energy nevertheless consulted internally and with shareholder representatives through ordinary governance channels in preparing this Statement.

This Statement documents the governance measures, risk assessments and policy improvements initiated to strengthen YN Energy's modern slavery risk management framework as part of its ongoing commitment to ethical and responsible business conduct.

### 2. Governance and Accountability

During the reporting period, YN Energy formalised its modern slavery governance framework, supported by a standalone Modern Slavery Policy and associated procedure documents. The Modern Slavery Policy sets out YN Energy's approach to identifying, assessing and addressing modern slavery risks, including governance responsibilities, supplier expectations, training, reporting pathways, escalation processes and record keeping requirements. The Board retains oversight of YN Energy's modern slavery framework and annual statement approval. YN Management, supported by the compliance function and relevant commercial, procurement, finance and legal personnel, is responsible for implementation, record keeping and annual reporting.

Furthermore, YN Energy provides the Board with an annual modern slavery update as part of the statement approval process, covering key risks, actions completed, supplier due diligence outcomes, training completion, incidents or red flags, and proposed improvements for the following reporting cycle.

### 3. Structure Operations and Supply Chains

YN Energy Pty Ltd is an Australian-incorporated proprietary company operating as a joint venture between:

- Shikoku Electric Power Co., Inc. (Japan), a Japanese power utility company; and
- Noble Resources International Pte Ltd (Singapore), a global independent commodities trading company.

YN Energy was established in 2016 to streamline and centralise the coal procurement function for Shikoku via an integrated JV structure that leverages market agility and blending expertise.

The Board of Directors comprises representatives from both parent companies, with corporate governance guided by jointly agreed principles and shareholder agreements.

#### Operations:

YN Energy's principal activity is the procurement, blending, and sale of thermal coal, specifically tailored to meet the fuel specifications required by Shikoku's power stations in Japan. The company operates solely within Australia and

maintains a small corporate office based in Newcastle, with no direct involvement in mining, extraction, or on-site labour activities.

Key operational characteristics include:

**Trading Only:** YN does not engage in coal mining, exploration, or extraction activities. Its role is limited to commercial procurement and sales.

**Blending Capability:** Coal from multiple sources is blended to meet required calorific values, ash content, sulphur levels, and other technical specifications of Japanese utilities.

YN Energy assesses the risk of modern slavery within its direct operations as Low. The company operates solely within Australia and maintains a small corporate office based in Newcastle, with no direct involvement in mining, extraction, or on-site labor activities.

### **Supply Chains:**

YN Energy's supply chains are structured across three key categories:

#### **- Coal Procurement:**

Coal is sourced from well-established producers in the Hunter Valley region of New South Wales. Purchases are made Free on Board (FOB) Newcastle under a combination of long-term and spot purchase agreements.

In 2025, YN Energy reviewed a selection of major coal suppliers as part of its supplier risk assessment. For the major coal suppliers reviewed, YN Energy identified modern slavery statements or comparable human rights / ESG disclosures in place, where such information was publicly available or otherwise provided. Detailed review metrics are tracked internally to support baseline monitoring and year-on-year improvement.

#### **- Logistics and Port Services:**

Rail haulage from mines to port is arranged through YN Energy's suppliers with national freight operators such as Pacific National Pty Ltd and Aurizon Operations Ltd. Port and stevedoring services are delivered at the Port of Newcastle by providers including Port Waratah Coal Services (PWCS) and Newcastle Coal Infrastructure Group (NCIG).

In 2025, YN Energy reviewed selected logistics and port service providers as part of its supplier risk assessment. For the providers reviewed, YN Energy identified modern slavery statements, modern slavery policies or comparable safety, human rights, ESG or governance disclosures in place, where such information was publicly available or otherwise provided.

#### **- Corporate Procurement:**

YN Energy's Newcastle-based corporate office procures a range of goods and services to support its day-to-day business operations. These may include IT equipment and software, office supplies, professional services and other administrative or business support services.

In 2025, YN Energy reviewed selected corporate procurement suppliers as part of its supplier risk assessment, where relevant and proportionate having regard to the nature of the goods or services provided.

#### 4. Risks of Modern Slavery in our Operations and Supply Chains

All procurement is conducted through Australian-based suppliers who are expected to uphold modern slavery compliance obligations. Supplier selection includes a review of publicly available Modern Slavery Statements and ethical sourcing policies where applicable.

YN Energy's risk assessment methodology considers both factors that may increase modern slavery risk and factors that may mitigate that risk. Factors that may increase risk include labour intensity, use of subcontractors, temporary or migrant labour exposure, higher-risk geographic exposure, complex supply chains, reduced visibility beyond direct suppliers, and the nature of the goods or services supplied. Factors that may mitigate risk include operation in regulated environments, publicly available modern slavery, human rights or ESG disclosures, established governance and compliance systems, supplier responsiveness, and transparency in relation to labour practices and supply chain controls.

Priority categories for mapping under this risk assessment included coal procurement, logistics and port-related services, corporate procurement, IT hardware and electronics, PPE or manufactured goods, and labour-intensive outsourced services such as cleaning, maintenance or facilities support where applicable.

For the purposes of prioritising due diligence, YN Energy uses the following internal risk categories:

**Low** generally applies where suppliers operate in regulated environments, have limited labour intensity or subcontracting exposure, and have available governance or modern slavery disclosures.

**Low to Moderate** generally applies where one or more risk indicators are present, such as subcontracting exposure, broader geographic exposure, operational labour, complex supply chains or reduced visibility beyond direct suppliers.

**Higher Risk / Priority Review** may apply where multiple risk indicators, limited transparency, higher-risk geographies, workforce vulnerability or other red flags require enhanced due diligence, management review or follow-up action.

These categories do not indicate that modern slavery has been identified. Rather, they are used to determine the relative level of due diligence considered appropriate based on supplier category, operating context and available risk information.

#### 5. 2025 Modern Slavery Risk Findings

The risk assessment covered 27 suppliers and counterparties across coal procurement, logistics, port services, corporate procurement, financial services and professional services. The assessment considered factors including sector risk, geographic exposure, subcontracting exposure, labour practice risk, the nature of goods and services provided, and the availability of modern slavery, human rights, ESG or governance disclosures.

For the 2025 reporting period, YN's risk for Modern Slavery is determined as follows;

##### Low Risk:

##### **Direct Operations**

YN Energy assesses the risk of modern slavery within its direct operations as low. The company operates solely within Australia and maintains a small corporate office based in Newcastle, with no direct involvement in mining, extraction, or on-site labour activities.

## Coal Procurement

Coal is sourced exclusively from major Australian producers that are subject to strong corporate governance frameworks and domestic legal obligations, including prohibitions against slavery, servitude, forced labour, and human trafficking under Australian law. These producers are primarily publicly listed entities with formal commitments to environmental, social, and governance (ESG) standards.

## Low to Moderate Risk:

### Third-Party Logistics and Stevedoring

Modern slavery risks in YN Energy's logistics and transportation supply chain are considered low to moderate, given:

#### Rail haulage and Port Services

Rail haulage and port services are subcontracted to third-party logistics providers. While these companies demonstrate they operate within a regulated environment and have modern slavery policies in place, their broader labour supply chains may introduce residual risk.

YN Energy recognises that operational characteristics such as subcontracting, casual labour, labour hire or lower visibility over worker arrangements can increase modern slavery risk where there is reduced transparency over employment conditions. For internal risk assessment purposes, where possible, YN Energy monitors indicators such as forced labour, wage underpayment, excessive working hours, restricted worker mobility and other signs of labour exploitation.

YN Energy does not directly engage or manage transport staff but remains vigilant in reviewing counterparties' compliance frameworks.

### Corporate Procurement of Goods and Services

YN Energy's procurement of goods and services for its Newcastle office carries low to moderate risk, including:

- **IT Procurement**

YN Energy acknowledges that IT hardware (e.g., laptops, accessories) may be produced through global supply chains involving countries with a higher prevalence of modern slavery risks, including forced and child labour. While hardware is procured through Australian-based authorised resellers.

YN Energy recognises that global manufacturing supply chains may present increased modern slavery risk where upstream production involves limited visibility over labour conditions, recruitment practices, working hours, wages or worker protections. This may include risks associated with raw material extraction, component manufacturing or assembly operations in jurisdictions with weaker labour law enforcement. More detailed assessment of these risks is documented through YN Energy's internal supplier risk assessment process.

To address this, YN Energy engages with reputable suppliers that maintain robust modern slavery statements and ethical sourcing policies and prioritises those with transparent reporting on their global supply chains.

- **Office Consumables and Services**

YN Energy considers that office consumables and services, including stationery, cleaning and software, pose a lower modern slavery risk, as these goods and services are typically sourced or delivered within Australia under regulated workplace laws and standards. Nevertheless, YN Energy applies a risk-based due diligence process to corporate procurement, including:

- Screening key suppliers for ethical sourcing practices,
- reviewing supplier modern slavery disclosures (where applicable), and
- seeking transparency and accountability in the supply chain.

### **Higher Risk / Priority Review**

There were no suppliers to YN in the reporting period in this category.

## **6. Actions to Assess and Address Modern Slavery Risks**

YN Energy acknowledges its responsibility to identify, assess, and mitigate modern slavery risks within its operations and supply chains. While the overall risk remains low due to the nature of its business and reliance on established Australian suppliers, the company is committed to strengthening its governance and due diligence framework over time.

YN Energy recognises that modern slavery risks exist in global supply chains. As such, the company is committed to:

- Continuously reviewing supplier practices,
- increasing staff awareness and training,
- aligning procurement decisions with its modern slavery policy, and
- maintaining and reviewing its Company Supplier Register

### **Supplier Engagement and Questionnaires:**

As part of the 2025 reporting period review, YN Energy completed a baseline review of key suppliers and counterparties to establish an initial view of modern slavery risk across its supply chains. This review included desktop assessment of supplier categories, publicly available modern slavery statements, human rights or ESG disclosures, governance materials, geographic exposure, subcontracting exposure and labour practice risk indicators.

Responses should focus on minimising harm to affected workers. Immediate termination of a supplier relationship should not be automatic if doing so could worsen outcomes for affected workers. Corrective action, supplier engagement and monitoring may be appropriate depending on the circumstances.

As part of this process, YN Energy issued a modern slavery supplier questionnaire to selected key suppliers. The questionnaire requested information on recruitment and employment practices, use of subcontractors or labour hire, grievance mechanisms, worker protections, forced labour and child labour controls, supplier due diligence processes, and any known labour violations or modern slavery issues.

Following completion of the 2025 baseline review, YN Energy intends to apply a risk-based supplier review process on an ongoing basis.

### **Contractual Commitments:**

YN Energy seeks, where practicable, to include provisions in supplier agreements that promote awareness of modern slavery risks and encourage transparency, ethical conduct and appropriate reporting channels. These provisions form part of YN Energy's broader approach to responsible contracting and supplier engagement.

YN Energy will continue to review key contracts and templates to assess whether modern slavery provisions are included. Where possible, further amendments will be considered at contract renewal, renegotiation or variation. For new suppliers, YN Energy will incorporate modern slavery considerations into the onboarding process, including, where appropriate, review of supplier modern slavery statements or comparable policies, supplier declarations or questionnaires, and relevant contractual provisions.

**Reporting, Escalation and Remediation:**

The Company has developed, and will continue to maintain, a supplier register to support supply chain mapping and modern slavery risk review. The register is intended to record key supplier information, relevant supplier categories, modern slavery or ESG documentation reviewed, risk indicators, follow-up requirements and evidence retained.

Where a concern is raised, YN Energy will record the matter, assess urgency and potential worker harm, escalate internally, gather relevant information, engage with the supplier or counterparty where appropriate, consider legal or specialist advice if required, determine corrective or remedial action and retain records of decisions and follow-up.

YN Energy has developed a more explicit reporting and escalation approach for suspected modern slavery issues or significant red flags. Employees and contractors are expected to report concerns promptly to their manager, the Managing Director, the compliance contact or an applicable whistleblower or grievance channel.

For the 2025 reporting period, YN Energy's supplier base was generally assessed as Low or Low to Moderate risk for the purposes of prioritising due diligence. No supplier was identified through the desktop review or supplier questionnaire process as requiring escalation beyond standard due diligence during the reporting period.

Each major supplier reviewed demonstrated a structured approach to modern slavery due diligence, including through public ESG disclosures and internal compliance systems. These measures support YN Energy's assessment that the risk of modern slavery in its coal procurement activities remains Low.

**Internal Training and Awareness:**

In 2025, all employees/associates completed initial training on modern slavery awareness, including how to identify red flags and respond appropriately. The training covered YN Energy's modern slavery risk profile, staff responsibilities, reporting pathways and escalation procedures.

Modern slavery awareness training will be repeated at least every two years as part of YN Energy's compliance calendar and will be incorporated into onboarding for new staff where appropriate. Additional targeted refresher training may be provided earlier where appropriate, including for personnel involved in procurement, commercial contracting, supplier management or compliance activities.

**Supply Chain Visibility:**

In 2025 YN Energy began mapping its supply chains beyond major suppliers, with an initial focus on higher-risk procurement categories such as IT hardware. This analysis provides improved visibility into country-of-origin and labour practices, allowing the company to prioritise areas for further due diligence.

**Alignment with Shareholder Standards:**

YN Energy aligns its approach with the human rights and compliance frameworks of its shareholders—Noble Resources and Shikoku Electric. These include internal grievance mechanisms, whistleblower protections, and codes of conduct that promote respect for international human rights standards.

**7. Measuring Effectiveness of Our Actions**

YN Energy assesses the effectiveness of its modern slavery actions through practical, evidence-based indicators and management review. These measures are intended to help YN Energy evaluate whether its actions are improving staff awareness, supplier visibility, due diligence maturity and governance oversight.

- Training Completion Rates: Monitoring the percentage of staff completing modern slavery training and incorporating knowledge checks to assess understanding.
- Supplier Questionnaire Compliance: Tracking response rates and the quality of information received from suppliers, with follow-up actions recorded where gaps are identified.
- Review of Grievance Mechanisms: Monitoring usage and awareness of internal grievance channels to ensure they are functioning as intended and accessible to all staff.
- Policy and Contract Audits: Periodically reviewing supplier contracts and internal policies to confirm inclusion of relevant modern slavery clauses and alignment with ethical sourcing standards.
- Board and Management Oversight: Including modern slavery risk as a standing item in ESG and risk management discussions at board and executive meetings.

These assessment methods will enable YN Energy to evaluate the impact of its efforts and guide improvements in its modern slavery risk management practices over time.

## 8. Consultation

In preparing this Modern Slavery Statement, YN Energy consulted with its shareholders, Noble Resources International Pte Ltd and Shikoku Electric Power Co., Inc., to ensure alignment on governance expectations, risk management, and corporate responsibility during the 2025 reporting period.

Regular consultation with shareholders also occurs through board meetings and strategic updates, reinforcing a shared commitment to continuous improvement in ethical sourcing and modern slavery risk management.

## 9. Approval Process

This Modern Slavery Statement has been prepared following the conclusion of YN Energy Pty Ltd's 2025 reporting period. The policies and actions described in this Statement were implemented or progressed during the 2025 reporting period to strengthen YN Energy's modern slavery risk management approach.

The preparation of this statement involved collaboration across multiple business functions, including commercial operations, procurement, legal, and compliance. The statement was reviewed internally and verified against key records such as supplier agreements, governance documents, and policy frameworks.

The statement was then submitted to the Board of Directors for review. Upon confirming that it accurately reflects YN Energy's commitments and forward-looking actions, the Board formally approved the statement.

Following Board approval, the Statement will be signed by the Managing Director on behalf of the Board and submitted in accordance with the requirements of the Modern Slavery Act 2018 (Cth). YN Energy will retain the signed Statement, approval records and submission confirmation as part of its compliance records. The Statement will also be published on the YN Energy website following approval and submission.

Aron Bagnall



Managing Director  
YN Energy Pty Ltd

Date: *26, June, 2026*