WHITEHAVEN COAL

Modern Slavery Statement

March 2021

Whitehaven Coal Limited ('Whitehaven' or the 'Company') is a for-profit entity, and the principal activity of Whitehaven and its controlled entities (referred to as the 'Group') is the development and operation of coal mines in New South Wales and Queensland. Whitehaven is a company limited by shares incorporated and domiciled in Australia whose shares are publicly traded on the Australian Securities Exchange.

This Statement is made on behalf of Whitehaven Coal Limited (ABN 68 124 425 396). Whitehaven Coal Limited qualifies as a reporting entity under the Australian Modern Slavery Act 2018. The following entities also meet the reporting test set out in the Australian Modern Slavery Act 2018: Whitehaven Coal Mining Ltd, Narrabri Coal Pty Ltd, Aston Coal 2 Pty Ltd.

In this statement, unless expressly mentioned otherwise, references to Whitehaven Coal and the Group, the Company, we, us and our, refer to Whitehaven Coal Limited, its subsidiaries and its controlled entities and Whitehaven Coal Limited operated joint operations as a whole as outlined on pages 105 and 106 of our Annual Report 2020. The registered office for all controlled entities is Level 28, 259 George Street, Sydney NSW 2000.





Chairman's introduction

Whitehaven Coal is a proudly Australian company. Our purpose is to support and sustain regional communities by exporting high quality coal from Australia, to the world, and respecting human rights is integral to delivering on our commitments.

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. We acknowledge our role in supporting socially responsible operational, supply chain and community engagement practices. We support the objectives of the Modern Slavery Act to provide transparency on and manage risks associated with modern slavery throughout supply chains.

This statement outlines our approach to identifying and addressing modern slavery risks in our operations, supply chain and community engagement activities, as well as the associated governance structures and reporting frameworks and importantly, our plans for the future.

We welcome feedback on how we can continue to improve our approach in this area; feedback can be sent to **sustainability@whitehavencoal.com.au**

The Hon. Mark Vaile, AO
Chairman

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) and has been approved by the Whitehaven Coal Board.

Our business

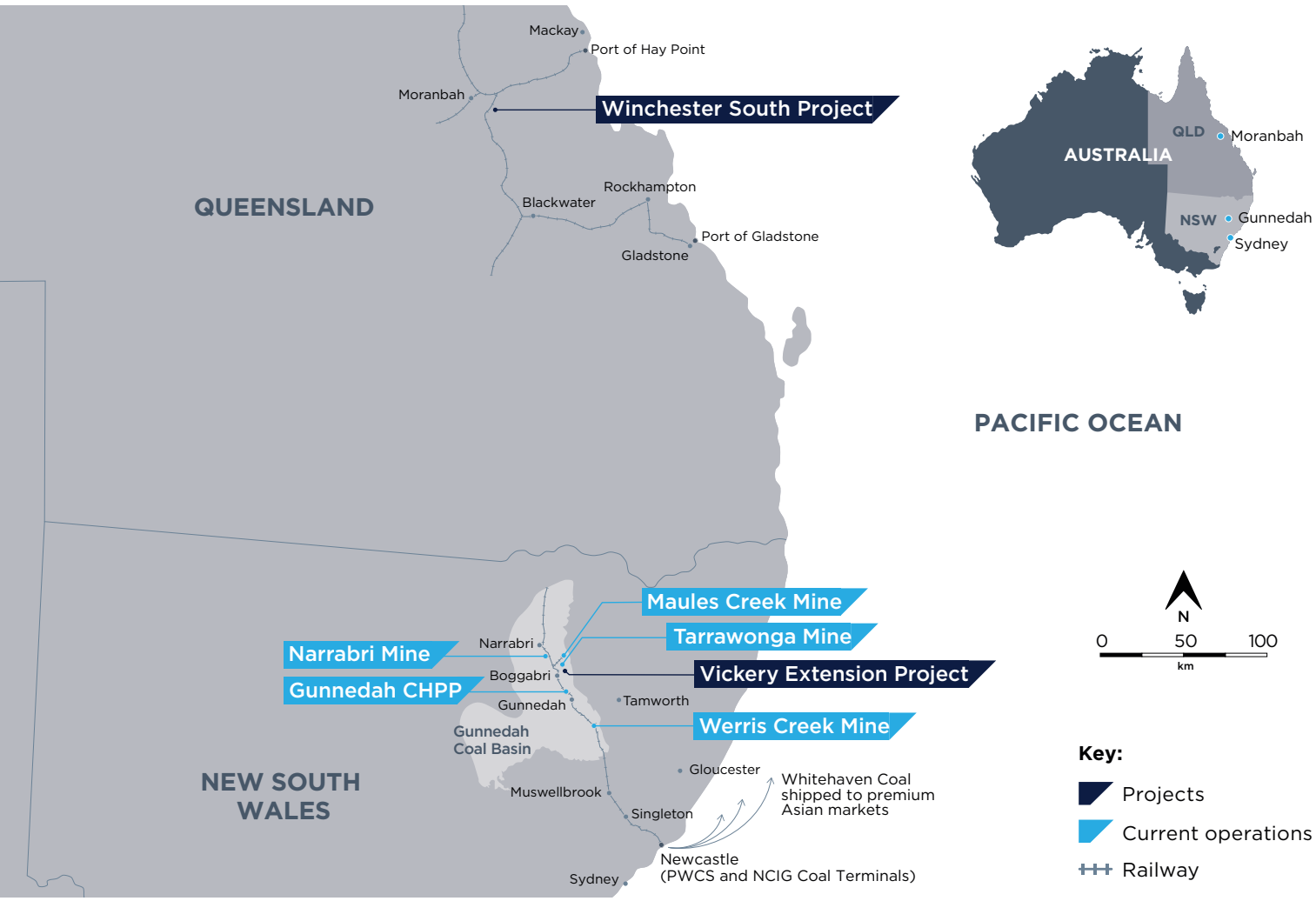
Whitehaven Coal is proud to be the leading Australian producer of premium-quality coal.

We are the dominant player in Australia's only emerging high-quality coal basin. We help power developed and emerging economies in Asia where there is strong and growing demand for our product, particularly for use in high-efficiency, low-emissions coal-fired power stations.

Our purpose as a company is to support and sustain regional communities by exporting high-quality thermal and metallurgical coal from Australia to the world. North West NSW is the focus of our capital investment and workforce presence.

We operate four mines (three open-cut and one large underground mine) in the Gunnedah Coal Basin of NSW. Our operating assets are complemented by two high-quality, near-term development assets, being Vickery, near Gunnedah, and Winchester South, in Queensland's Bowen Basin. Over our almost 20-year history, including 12 years as a publicly-listed entity on the Australian Securities Exchange, we have developed a growing reputation for excellence in project delivery, safe operation, and targeted investment in the local economy and community.

We are proudly local, and around 75% of our 2,500-strong workforce lives in the local communities around our mine sites. We believe in helping communities grow, ensuring benefits flowing from our operations are seen and felt locally.



Our supply chain

In FY20, we spent more than $1.4 billion with more than 1,500 suppliers, the majority of which are Australian companies.

We are focused on ensuring the benefits of our operations are seen and felt locally, especially when it comes to procurement. To that end, we are proud to have spent $365 million with 336 suppliers based in North West NSW in FY20 alone.

All activities undertaken by Whitehaven with regard to procurement are subject to our Code of Conduct, which outlines the behaviour we expect from all members of the workforce, as well as the Anti-Corruption Policy. Members of the workforce also have access to an independent service to report potential misconduct as outlined in our Speak Up Policy. These policies are available at **whitehavencoal.com.au/corporate-governance.**



Identifying and addressing the risks of modern slavery

Our assessment and mitigation process has been led by our Group Finance and Procurement team, with oversight from the Audit & Risk Committee of the Board.

In early FY20, a risk assessment was completed to identify which elements of the business and supply chain could be susceptible to modern slavery risk. As Whitehaven's operations are wholly located in Australia, a country which has world-leading human and workplace rights legal protections, the risk of slavery amongst our operations is assessed as low. A review of Whitehaven's suppliers was completed. It focussed on the top 50 suppliers by expenditure in FY20, which accounted for about 80% of total procurement spend, all of which are Australian-based suppliers. As outlined in Figure 1 on page 4, the majority of spend across our top 50 suppliers was towards rail freight, fuel, equipment, and equipment hire.



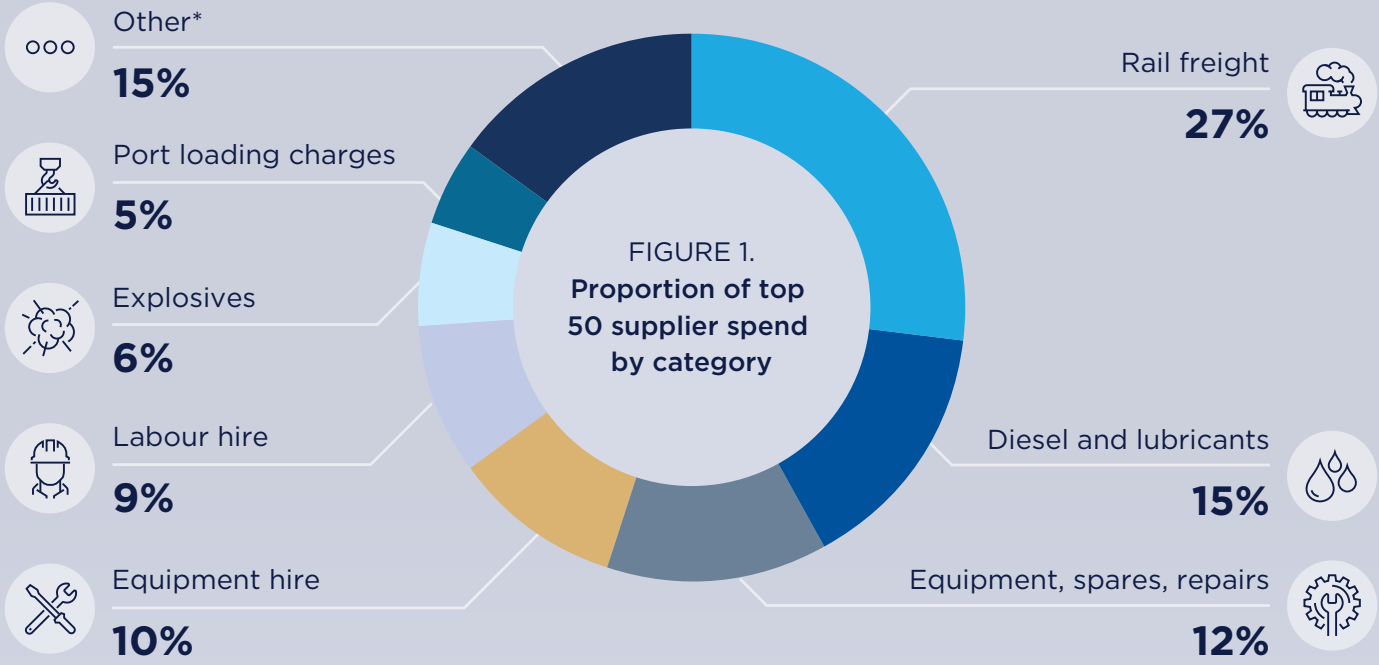


FIGURE 1.
Proportion of top 50 supplier spend by category

*Other includes: Drilling and gas drainage (3%), Tyres (3%), Mining consumables (3%), Electricity (2%), Corporate Finance (2%), Camp Accommodation (<1%), Consultancy Services (<1%).

Our top 50 suppliers were asked to provide information about relevant policies, systems, mechanisms, practices and processes in place to minimise or prevent the occurrence of modern slavery and indicators to measure the effectiveness of these systems. Suppliers were also asked to disclose any investigations into actual, suspected and alleged human rights breaches involving their workforce or supply chain, as well as their own key suppliers of goods and services and their primary countries of operation, and steps taken to mitigate the risk of modern slavery amongst the key suppliers.

Responses from the top 50 suppliers were reviewed against an assessment framework, concluding that no supplier was assessed as having a high risk of modern slavery practices.

Following the completion of its first modern slavery assessment Whitehaven will perform a periodic audit (similar to that outlined above), with any failure to participate or any supplier which is determined to be a high risk of modern slavery practices reported to senior management and appropriate further actions taken.

Continuing to improve our approach

We currently assess our effectiveness in identifying and managing modern slavery and human rights risks by tracking our actions and outcomes, engaging with suppliers, undertaking internal governance and external assurance processes and reporting via our Sustainability Report.

Building on activities to date, throughout FY21 we have been working towards implementing a range of initiatives proportionate to the risk identified, as listed in the adjacent table. In addition we undertake ongoing engagement with stakeholders to continue to improve our approach to identifying and addressing modern slavery risks in our supply chain.

Activity	Status
Risk assessment and mapping exercise to identify which parts of the business could be susceptible to modern slavery risk	Complete
Conduct due diligence on suppliers; issue questionnaire and assess risks, with a focus on top 50 suppliers by spend	Complete
Prepare anti-modern slavery training materials	Underway
Prepare and conduct anti-modern slavery training for key employees	Planned for CY21
Incorporate relevant assessment criteria in new tender processes	Complete
Update website to capture Modern Slavery information when suppliers lodge expression of interest	Complete
Add appropriate clauses in all new supplier contracts	Complete
Add modern slavery assessment to on-boarding process for new suppliers	Underway
Issue questionnaire to new suppliers, assess risks	Planned for CY21
Develop human rights and ethical sourcing policies	Planned for CY21

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