PEABODY POLICY
Anti-Slavery
P 200.05
December 2019

Executive Owner: Executive Vice President, Chief Legal Officer, Government Affairs and Corporate Secretary

Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls designed to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, in compliance with Australia's Modern Slavery Act and other laws and regulations, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery, servitude or debt bondage, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the Company or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

General Statement of Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Company (through your manager, your Company contact, local Human Resources representatives, the Peabody Compliance department, or the Tell Peabody hotline) as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you are encouraged to seek advice from from the Company through the channels identified above.

The Company will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment

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includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance department immediately or report this issue to the Tell Peabody hotline.

Breaches of Policy

For employees, failure to adhere to this policy may result in discipline, up to and including termination. We also may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

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