

Policy

Modern Slavery

February 2023

29Metals Limited ¹ ('**29Metals**', or the '**Company**') supports the global push to combat modern slavery and is committed to ensuring it has effective systems and controls for detecting and eliminating modern slavery within its operations and supply chains.

This document sets out 29Metals' policy regarding modern slavery

Document Control

Policy Owner	Company Secretary
Review Committee	Executive
Approval Authority	Board of Directors

Version Control

Version Number	Date Issued	Author	Amendment(s)
1.0	June 2021	Company Secretary	First published version
2.0	February 2023	Company Secretary	Edits arising from annual review

¹ In this document, a reference to 29Metals Limited includes each of its subsidiaries (from time to time), unless the context requires otherwise.

1. Who does this Policy apply to?

This Policy applies to all 29Metals directors, officers, executives, managers, employees and contractors (each, '**29Metals Personnel**'). This Policy is available via the 29Metals website for 29Metals Personnel, contractors, suppliers and the public.

This Policy should be read in conjunction with the Company's Code of Conduct and Whistleblower Policy.

2. Compliance with the Policy

The achievement of this policy is a collective business responsibility of everyone that works with and for 29Metals' business and suppliers to ensure 29Metals is compliant with the requirements of the Australian Modern Slavery Act 2018 (Cth) (the 'Act') and other relevant legislation.

Any 29Metals Personnel that fails to comply with this Policy may face disciplinary action, up to and including termination of employment in accordance with 29Metals' Code of Conduct.

3. What is modern slavery?

29Metals recognises modern slavery is an insidious, complex and multi-faceted problem which includes:

- human trafficking;
- slavery;
- servitude;
- forced labour;
- debt bondage;
- forced marriage; and
- any situation where children are subjected to forced or dangerous labour, slavery or similar practices.

In this Policy, *modern slavery* has the same meaning as in section 4 of the Act, and includes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

4. 29Metals' commitment

29Metals acknowledges its responsibility to identify and address modern slavery in its operations and supply chains and is fully committed to complying with its obligations under the Act and other applicable laws in any jurisdiction where 29Metals conducts business.

29Metals is committed to developing and maintaining systems and processes to detect and reduce the risk of modern slavery in 29Metals' supply chain.

4.1. 29Metals' operations and employees

29Metals prohibits the use of all forms of modern slavery in its operations and requires each person working for 29Metals' to respect and work to uphold human rights.

All 29Metals Personnel are required to:

- Comply with all applicable modern slavery laws and regulations, including but not limited to the Act and any other applicable modern slavery laws in any jurisdiction where 29Metals conducts business;
- Assist the Company to proactively identify, assess, mitigate and remediate modern slavery risks and impacts in 29Metals' business operations and supply chains; and

Communicate obligations under this Policy, the Act, and any related legislation and documents to all employees, business partners, contractors, suppliers and other associates as relevant.

4.2. 29Metals' supply chains

We require that our suppliers, contractors, consultants, joint venture partners and business partners follow the same high standards as we do. Suppliers must not engage in any form of modern slavery and must adhere to all applicable laws in the jurisdictions in which they operate.

29Metals will develop and maintain systems and processes to reduce the risk of modern slavery in 29Metals' supply chain. Such systems and processes may include:

- amending supply contracts as appropriate to require compliance with modern slavery laws;
- creating verifiable supplier corrective action plans;

- performing ongoing monitoring and reporting against supplier compliance;
- providing training to procurement team members;
- regularly reviewing modern slavery risks in our supply chain;
- working with higher risk suppliers to build awareness of modern slavery requirements and develop skills to identify modern slavery risks within suppliers' operations and supply chain; and
- terminating supplier relationships where the supplier fails to satisfy 29Metals that the supplier shares 29Metals' commitment and has taken appropriate steps to combat modern slavery in the supplier's business.

Concerns about any of our suppliers can be reported to the Company Secretary.

5. Reporting and grievances

Preventing modern slavery in 29Metals' operations is everyone's responsibility. If employees become aware of incidents of modern slavery, or any breach of this policy, they must report these incidents as soon as possible.

29Metals is committed to fairly, efficiently and confidentially following up on any allegations of modern slavery in 29Metals' operations or supply chains.

All 29Metals Personnel are encouraged to promptly report any actual or suspected instances of modern slavery. A person seeking to make a report can do so through one of the following means:

- a phone call or making an online report via the Whistleblower Hotline;
- an email or phone call to the Whistleblower Protection Officer; or
- an email or phone call to one of the designated senior managers detailed in the Whistleblower Policy. The subject of any email should make it clear that the email is being made as a report under this Policy.

Further details on 29Metals' Whistleblowing Policy, including a copy of the policy is available on 29Metals' website.

6. External reporting

29Metals will publish a *Modern Slavery Statement*, as required by the Act, that covers:

- the modern slavery risks at 29Metals;
- the processes in place to identify, manage and address modern slavery risks and impacts; and
- identify areas for improvement.

7. Training

All 29Metals Personnel will be required to undertake training in relation to this Policy as part of the Company's compliance training cycle.

The 29Metals' executive team, site senior leaders and members of the 29Metals' commercial and finance teams will be required undertake training in relation to this Policy on an annual basis.

A copy of this Policy will be made available to all 29Metals Personnel as part of the Company's normal induction procedures.

8. Review of this Policy

This Policy will be reviewed periodically to assess whether it continues to meet its purpose and objectives in the context of (among other things) applicable standards and relevant regulatory requirements, as well as community expectations.

Any amendment to this Policy requires the approval of the 29Metals Board.

A copy of this Policy will be available on the Company's website.