

# INTRODUCTION

This is Iluka's second Modern Slavery Statement covering the period 1 January 2021 to 31 December 2021. It summarises our response to the criteria mandated for public reporting in accordance with the Australian *Modern Slavery Act (2018)*. This Statement includes progress made on Iluka's modern slavery work programme during 2021 and highlights work planned for 2022.

We believe that all people should be treated with dignity and respect. Iluka rejects any form of slavery, forced or child labour, and works to ensure that such practices are not present in our business or supply chain.

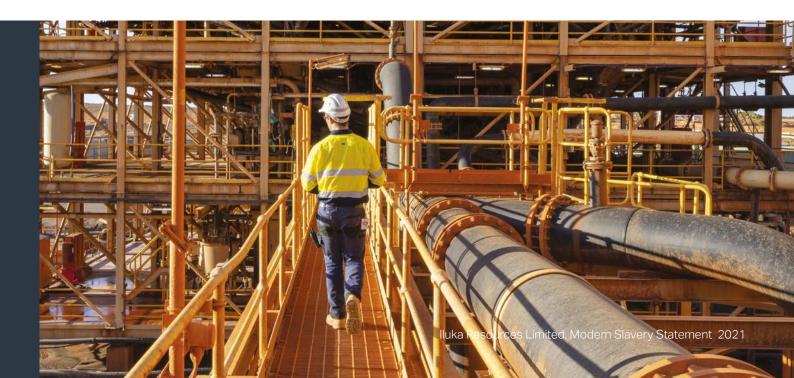
Iluka maintains a strong focus on human rights and seeks to align its business activities and practices with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Our supply chain is complex; spanning multiple sectors and countries. We are committed to working with suppliers and other stakeholders, including communities associated with the company's operations and activities, to assess supply chain risks and support the identification and eradication of modern slavery.

Iluka's approach to respecting human rights is guided by the Iluka Code of Conduct and Human Rights Policy, and embedded in the People Policy and Health, Safety, Environment and Community Policy.

# **ABOUT THIS STATEMENT**

This Statement is a joint statement issued by and on behalf of Iluka Resources Limited, Iluka Midwest Limited and Iluka International (West Africa) Pty Limited (the Reporting Entities). In preparing this statement, Iluka Resources Limited has consulted with these other Reporting Entities throughout the drafting process. As the higher entity within the Iluka Group, Iluka Resources Limited's Board has approved and a responsible member has signed this statement.

In this Statement, the collective expressions "we", "us", "our", "ourselves", "the company", "the Group", "lluka" and "the lluka Group" are used where reference is made, in general, to the Reporting Entities and their respective subsidiaries. The use of those terms is for convenience only and used where no useful purpose is served by identifying any particular company or companies, and is not intended to convey how the lluka Group is structured, managed or controlled. Iluka produces Groupwide policies and procedures to ensure uniform practices across the lluka Group. Certain lluka Group operating subsidiaries, including Sierra Rutile Limited (SRL), have independent policies, procedures and management teams.



# **2021 KEY ACHIEVEMENTS**

In our second reporting year, Iluka:

Established a Board Sustainability Committee to assist the Board in reviewing and approving the company's sustainability strategy, which is designed to manage environmental, social and governance risks and impacts, including human rights and modern slavery.

Reviewed the efficiency and efficacy of Iluka's grievance mechanisms.

Completed a third party review of Iluka's approach to modern slavery risk management and provided recommendations for further improvement.

Conducted vendor mapping and risk assessment on tier one suppliers.

Completed an internal assessment of modern slavery risks associated with the Sierra Rutile operations.

Developed Iluka's Supplier Code of Conduct that specifies Iluka's respect for human rights expectations in its procurement activities.

Launched Iluka's new vendor portal, providing suppliers with an online platform to register their details for evaluation, as well as to screen new vendors during onboarding for modern slavery risks.

Developed Iluka-specific human rights and modern slavery training material to support ongoing awareness and education of Iluka suppliers.

Completed a pilot with 150 new high risk Iluka suppliers using Iluka's Modern Slavery Supplier Self-Assessment Questionnaire and implemented a risk assessment of all new vendors.

Worked in collaboration with the Australia-based Human Rights Resource and Energy Collaborative, and Walk Free Foundation to develop industry-specific human rights remediation protocols and audit programmes.

# **WHO WE ARE**

Iluka Resources Limited (Iluka) is an international critical minerals company with expertise in exploration, project development, mining, processing, marketing and rehabilitation.

Our core objective is to deliver sustainable value.

With over 70 years industry experience, Iluka is a globally significant producer of zircon and high grade titanium feedstocks; and is set to become a globally material supplier of refined rare earths.

With over 3,000 direct employees, the company has operations and projects in Australia and Sierra Leone; and a globally integrated marketing network. Exploration activities are conducted internationally and Iluka is actively engaged in the rehabilitation of previous operations in the United States, Australia and Sierra Leone. In 2022 Iluka announced its intention to demerge the Sierra Rutile operation in Sierra Leone and any operational changes including the nature of Iluka's supply chain will be presented in the 2022 Modern Slavery Statement.<sup>1</sup>

Headquartered in Perth, the company is listed on the Australian Securities Exchange (ASX). Iluka holds a 20% stake in Deterra Royalties Limited (Deterra), the largest ASX-listed resources focused royalty company.

This report covers lluka's operations globally, including exploration, project development, mining, processing, marketing and rehabilitation activities.

<sup>1</sup>ASX Announcement Intention-to-demerge-sierra-rutile.aspx (iluka.com)



# **OUR LOCATIONS**

# OPERATIONS, RESOURCE DEVELOPMENT, MARKETING AND REHABILITATION ACTIVITIES

## **WESTERN AUSTRALIA**

- Cataby mining and concentrating
- Narngulu processing
- Eneabba development
- Capel synthetic rutile processing
- South West deposits project
- Corporate support centre
- Rehabilitation

# **SOUTH AUSTRALIA**

- Jacinth-Ambrosia mining and concentrating
- Atacama project
- Rehabilitation

# **NEW SOUTH WALES**

- Balranald project
- Euston project

## **VICTORIA**

- Wimmera project
- Rehabilitation
- Hamilton processing (idle)

#### **UNITED STATES**

- Marketing and distribution
- Rehabilitation

#### **EUROPE**

Marketing and distribution

#### **ASIA**

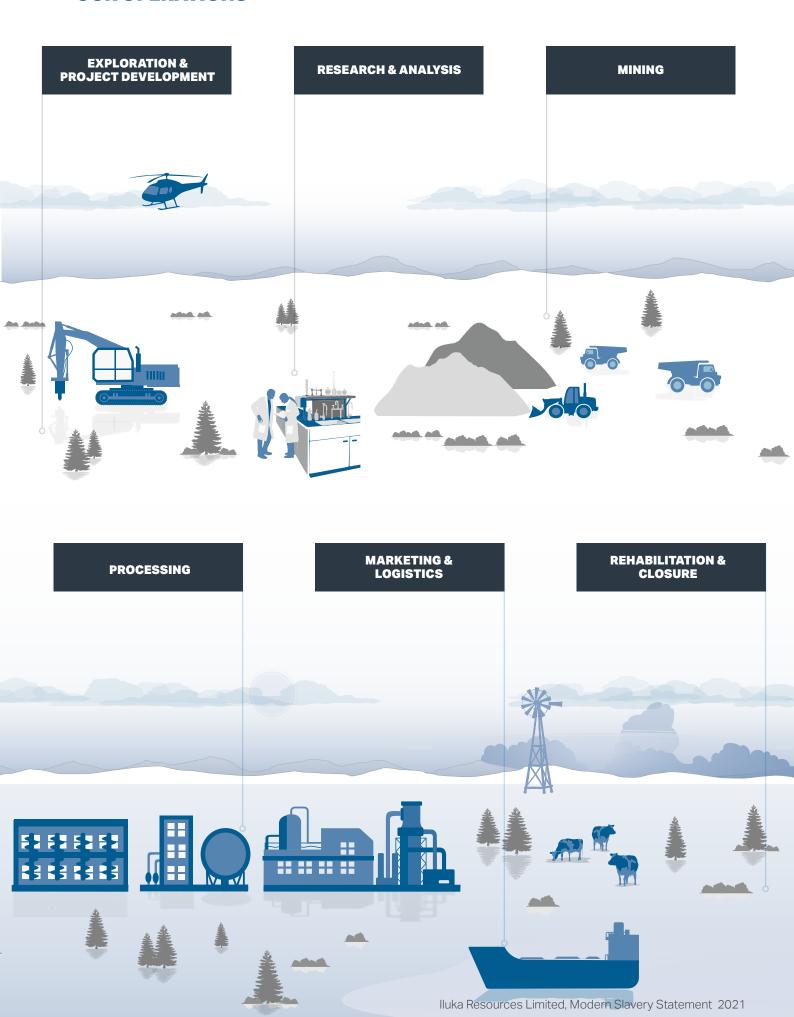
Marketing and distribution

#### **SIERRA LEONE**

- Sierra Rutile mining, concentrating and processing operations
- Sembehun project
- Rehabilitation



# **OUR OPERATIONS**



# **SUSTAINABILITY AT ILUKA**

lluka's goal is to be a safe, responsible and sustainable supplier of critical minerals.

Our approach is aligned with recognised voluntary principles and frameworks; and contributes to the advancement of the United Nations Sustainable Development Goals. Iluka is committed to the integration of sustainability into everyday business practices and to the continuous improvement of the company's sustainability performance.

Underpinning our approach is lluka's commitment to transparency, behaving ethically and conducting business in accordance with high standards of corporate governance through comprehensive systems and processes.

During the year, Iluka's sustainability programme was reviewed and a Group-wide three year sustainability strategy was established with endorsement from Iluka's Executive and approval by the Board. The strategy is structured around three pillars: Trusted by our people and communities; Responsible for our environment; and Operate in and provide products for a low carbon world.

# RESPONSIBLE FOR OUR ENVIRONMENT



To be cognisant of the impact of Iluka's operations on the environment and maximise the efficiency in how the company operates

# TRUSTED BY OUR PEOPLE AND COMMUNITIES



To engage and build the capability of Iluka's workforce and embed a consistent approach to relationships with the communities where Iluka operates

# OPERATE IN AND PROVIDE PRODUCTS FOR A LOW CARBON WORLD



To recognise that the manner in which Iluka operates and evolves its business can reduce the company's carbon footprint and provide opportunities to support the transition to a low carbon economy



SUSTAINABILITY STRATEGY 2022-2024

ILUKA'S PURPOSE IS TO DELIVER SUSTAINABLE VALUE

Our goal is to be a safe, responsible and sustainable supplier of critical minerals

# **OUR VALUES**

Our values shape and guide the way we do business and project what Iluka stands for – to employees, suppliers, customers, shareholders and the communities in which we operate.

# **ACT WITH INTEGRITY**

- Do the right thing
- Be transparent and honest
- Honour our commitments

## **DEMONSTRATE RESPECT**

- Treat everyone with dignity
- Listen
- Value our differences

# **SHOW COURAGE**

- Innovate
- Challenge the status quo
- Take considered risks

# **TAKE ACCOUNTABILITY**

- Take responsibility for our workplace
- Be committed to what we do
- Take ownership for our actions

# **COLLABORATE**

- Seek input and value feedback
- Presume trust
- · Help each other

# **LEADERSHIP**

"Respecting human rights is a collective responsibility. We are committed to working with our employees, contractors, customers and suppliers to continuously improve our approach and response to modern slavery risks in our business."



**Tom O'Leary**Managing Director and
Chief Executive Officer



**Sarah Hodgson**General Manager,
People and Sustainability

# **OUR SUPPLY CHAIN**

Iluka's supply chain spans 34 countries, with approximately 74% of the company's spend local to our operations in Australia and Sierra Leone. Iluka uses the Walk Free Foundation 2018 Global Slavery Index (GSI)<sup>2</sup> to inform the assessment of each country's modern slavery risk.

In 2021 Iluka's purchasing included supplies from five countries with a GSI of 30 or less (high risk countries), representing approximately 3.8% of our total spend.

As part of Iluka's modern slavery risk assessment, the type of goods and/or service purchased (referred to as material groups) is considered. Some of our top material groups represent known risk factors for modern slavery, as listed below.

ILUKA PURCHASING MATERIAL GROUP	RISK FACTOR
Contracted Services (general)	Labour rights
Bulk freight and cartage	Seafarer welfare Labour rights
Contractor mining/major earth moving	Labour rights
Fuel-Diesel	Goods containing conflict materials
Repair plant and equipment services	Manufacturing
Storage and handling	Labour rights
Chemicals and chemical products	Manufacturing



 $<sup>^{2}</sup>$  The Global Slavery Index 2018 – Government Response Index

# **SNAPSHOT OF ILUKA'S SUPPLY CHAIN**

2,090 suppliers (Iluka 1846, SRL 244)

Supplier locations: 34 countries

AUD \$1,028 million spent globally in 2021 (Iluka \$767 million, SRL \$261 million)

78.5% of Iluka's total spend in 2021 was from suppliers in low risk countries (GSI of 60 or above), an increase from 68% in 2020

3.8% of Iluka's total spend in 2021 was from suppliers in high risk countries (GSI of 30 or less), an increase from 2.5% in 2020. Countries included China, Ghana, Guinea, Hong Kong and South Korea

Contracted services, bulk freight and major earthworks, and mining contracting purchasing material groups continue to represent the highest spend and risk

# **TOP 10 ILUKA SUPPLIER CATEGORIES BY % OF TOTAL ILUKA SPEND**

	Contracted Services (general)	28.53%
只	Bulk freight and cartage	12.86%
<del>6</del> 6	Contractor mining/major earth	12.03%
	Fuel-Diesel	6.42%
O <sup>o</sup>	Repair plant and equipment services	5.58%

Ů	Professional services	5.35%
\$	Government Royalty	2.95%
	Storage and handling	2.59%
	Chemicals and chemical products	2.24%
6	Electricity	1.82%

# **OUR APPROACH TO MODERN SLAVERY**

lluka's approach to addressing modern slavery is focussed on three areas.



# **GOVERNANCE**

Iluka believes that to succeed in business and human rights endeavours, strong governance is essential. This means that Iluka's policies and processes are clear, easy to follow and have measurable outcomes. This drives accountability and ensures transparency of our actions. Wherever inconsistencies are found, we address them in a systematic way.



# **ASSESSING OUR RISK**

Iluka assesses risk at multiple levels to understand potential exposure points and address them accordingly. To build a meaningful analysis we conduct risk assessments on Iluka's direct employees and employment processes, and suppliers. Iluka's risk processes continue to improve as the company enhances its internal systems that assess risk and supplier data.



# **ACTION**

Iluka's modern slavery work
programme aims to align the business
with the UN Guiding Principles for
Business and Human Rights. The work
programme is endorsed by Iluka's
Executive and Board.



# **GOVERNANCE**

In 2021 Iluka continued to embed modern slavery prevention practices across the business, review their effectiveness and identify continuous improvement opportunities. Iluka's modern slavery work programme addresses the requirements of the Australian *Modern Slavery Act (2018)*, which will continue to mature as the company gains experience in assessing and managing its supply chain risks.

Iluka's governance framework supports the ongoing assessment and management of modern slavery risk; and underpins the implementation of procedures and actions to target potential modern slavery incidents.

Figure 1 lluka's governance framework approach to address modern slavery.

ORK			<b>CORPORATE</b> ee		
GOVERNANCE FRAMEWORK	<ul> <li>PROCUREMENT</li> <li>Procurement standards</li> <li>Contract templates and standard agreements</li> <li>Procurement policies</li> <li>Supplier Code of Conduct</li> </ul>	<ul> <li>DUE DILIGENCE</li> <li>Gap assessment</li> <li>Audits</li> <li>Self Assessment Questionnaire (SAQ)</li> </ul>	<ul> <li>LEGAL</li> <li>Anti-Bribery Corruption policies</li> <li>Whistleblower Policy</li> <li>STOPline</li> </ul>	PEOPLE  Code of Conduct  Recruitment policies and procedures  SRL Human Resources Manual  Labour standards  Employment agreements	<ul> <li>COMMUNITIES</li> <li>Human Rights Policy</li> <li>Social performance standards</li> <li>Grievance mechanism</li> <li>Impact assessment</li> </ul>
			TRAINING		

# **MODERN SLAVERY WORKING GROUP**

lluka established an internal modern slavery working group in 2018, comprising cross-functional representatives from lluka's procurement, risk, legal, people and communities teams.

The working group is chaired by a member of the Executive team. It provides a forum for engagement and is accountable for progressing the modern slavery work programme and providing regular updates to the Executive and Board.

For the purpose of preparing this statement, engagement and consultation was held with representatives with each of the reporting entities owned or controlled by Iluka.

#### **DUE DILIGENCE**

In 2021 Iluka commissioned Anti-Slavery Australia (ASA), University of Technology Sydney, an independent university-based organisation specialising in human rights, to provide recommendations on the company's approach to the management of modern slavery risk.

lluka's approach to date has been purposefully broad, seeking to raise the level of understanding held by lluka's suppliers and to identify any high level risks. ASA identified further improvements to lluka's assessment methodology that enables a deeper examination of modern slavery risks in the supply chain.

This will be delivered through a Supplier Risk Framework that builds on Iluka's current approach, adding consideration of Iluka's ability to leverage based on spend and reputational risk factors. It will consider the risk controls suppliers possess and then delve deeper into those that carry high residual risks.

## SUPPLIER CODE OF CONDUCT

Iluka is committed to respecting human rights in connection with our operations or activities and required that of its contractors and suppliers.

A Supplier Code of Conduct has been developed to set out Iluka's minimum expectations in the following areas:

- Ethical business practices
- Human rights and Labour practice and standards
- Environmental stewardship
- Social performance
- · Privacy/Confidentiality

Iluka suppliers will be expected to develop and implement policies consistent with the Code and encourage their respective supply chains to do the same. The Code will be incorporated by reference into Iluka's procurement contracts suite in 2022. The intention is for the Code to assist Iluka (and its suppliers) to improve sustainability outcomes in their respective supply chains.



# **EFFECTIVENESS**

## **GRIEVANCE MECHANISMS**

Iluka's Social Performance Standard describes the process for identifying any social impacts Iluka operations may cause or contribute to. All Iluka sites must have a locally-appropriate grievance mechanism, as described in Iluka's Grievance Management Procedure, which aligns to the UN Guiding Principles on Business and Human Rights.

Iluka's Whistleblower Policy sets out how employees, suppliers, contractors to Iluka and the general public can report concerns of potential or actual misconduct through an external independent whistle-blower service STOPline.

During 2021 Iluka conducted a review of existing grievance mechanisms for modern slavery scenarios. The review aimed to establish whether Iluka's existing grievance mechanisms enable potential victims of modern slavery in Iluka's supply chain to raise grievances with Iluka and have them appropriately acted upon.

The review concluded that existing mechanisms are effective for incidents occurring within Iluka's immediate control or influence; and made several recommendations for their improvement including:

- select grievance mechanisms that are practical and appropriate to the context and conditions faced by potential reporters; and
- address recourse and action that Iluka can realistically promise and take, with due regard for the jurisdictional complexity of modern slavery scenarios.

The review recommendations will be considered for implementation by lluka as part of its modern slavery work programme. In 2021 there were zero grievances raised via the whistleblower service, consistent with 2020. Completion rate for internal modern slavery training in the year was 67% of mandatory completions.

# **PEOPLE**

During 2021 Iluka completed an internal review of the management processes and procedures in place at SRL, specifically with respect to their effectiveness in managing modern slavery risk.

The assessment findings concluded that practices employed by SRL relating to direct employment are unlikely to give rise to modern slavery within its own workforce.

Ramboll UK Limited (Ramboll) was commissioned by SRL to act as Independent Environmental and Social Consultant (IESC) and undertake an Environmental and Social Audit of activities within Area 1 of the Sierra Rutile Mining Project, Sierra Leone. SRL was assessed against the applicable standards, particularly the International Finance Corporation (IFC) Performance Standard 2: Labour and working Conditions.

The audit noted significant progress has been made since the last IESC audit (2019), the human resources policies and procedures in place are generally robust and comprehensive. The IESC did make recommendations for minor revisions to be addressed at the next review of human resources policies and procedures. Relevant policies are currently under review and will be subject to future audit.

A similar third party assessment of modern slavery risk management within the remainder of Iluka's workforce (excluding SRL) is proposed for 2022.

# **ASSESSING OUR RISK**

lluka's process to assess modern slavery risk in the company's supply chain currently comprises of:

- screening risk assessment and prioritisation of active suppliers using data from Iluka's procurement system;
- supplier Self-Assessment Questionnaire (SAQ) sent to existing and all new vendors (previously issued at pilot scale in 2020); and
- for cause supplier assessment conducted upon receipt of credible information justifying accelerated assessment.

#### **SCREENING ASSESSMENT**

Iluka conducts supplier risk assessments on all active suppliers in Iluka's SAP and PRONTO procurement systems. SRL operations are working to minimise the number of local providers not recorded in either of these systems.

In 2021 Iluka's supply chain assessment is based on three main criteria: country of origin of goods, industry sector and commodity or service type. Using these criteria to conduct a high-level risk assessment of data from SAP provides a supply chain risk snapshot. In 2021 this high level risk assessment was supported by ASA.

The supplier data is then evaluated by Iluka, utilising externally developed tools and indices to identify modern slavery indicators including:

- Walk Free Foundation Global Slavery Index;
- US State Department of Labor: List of Products Produced by Forced or Indentured Child Labor; and
- International Labour Organisation: Indicators for Labour Standards.

Modern slavery supply chain screening is still developing and some data inaccuracies persist within the company's systems in relation to geographic data (i.e. location of registered entity versus location of manufacture and goods supply). Greater understanding and ability to manage modern slavery risk exposures may emerge as more extensive and accurate data becomes available.

# SUPPLIER SELF-ASSESSMENT

Individual vendor assessments were undertaken during 2021, building upon the pilot in 2020. All new vendors plus 150 existing suppliers were issued the SAQ along with modern slavery and human rights awareness training material. The mandatory requirement for all new vendors to complete SAQ ensured a continued increase in engagement through the year.

Following a review of completed SAQs, further actions may be identified such as:

- request(s) for additional documentation relating to policies, standards and procedures;
- creation of a monitored action plan to improve aspects of their supply chain or to create greater transparency; and/or
- · further investigation into the supplier.

A review of the 2021 completed SAQs identified matters such as the withholding of employee identification documents. These matters were addressed through direct vendor engagement. In many cases engagement provides clarification (e.g. company simply holds copies not originals of identification documents). If requests for clarification are not satisfied further engagement and remedy will need to be considered. To date these additional steps have not been required.

lluka's assessment of modern slavery risk beyond the high level screening of supply chains and supplier selfassessments will improve as the company's approach matures.

#### **MODERN SLAVERY INCIDENT REPORTING**

In accordance with the Iluka Health Safety, Environment and Community Management System, the reporting and classification of hazards and incidents is set out in a Group guideline. The guideline will be revised in 2022 to include examples of modern slavery incidents that require internal reporting. This provides a framework to ensure visibility on modern slavery occurrences that have been identified at any Iluka operation.

#### **OUR RISK PROFILE**

lluka's 2021 supplier database analysis, coupled with preliminary vendor screening, shows a predominantly low risk profile for goods and services procured.

In respect of country of origin for goods and services the highest risk ratings were identified for China, Ghana, Guinea, Hong Kong and South Korea, representing less than 4% of overall spend.

Defining high risk by purchasing category, the higher risk ratings within the supply chain comprise construction and building materials, electrical hardware, and uniforms and personal protective equipment, albeit those categories each represent less than 0.1% of Iluka's overall spend.

# **OUR WORKFORCE**

With respect to the assessment of modern slavery risk attributable to our own workforce, Iluka will regularly review employment practices and grievances for indicators of increase in risk profile. Currently Iluka's workforce comprises minimal casual labour (less than 1%), which can carry a higher risk.

# **TOP ILUKA SUPPLIER COUNTRIES (>1% TOTAL SPEND)**



# **AUSTRALIA**

**63.8** GSI

64.0%

of total Iluka spend

Top material groups Contracted services, freight and cartage and contractor mining/



# **SIERRA LEONE**

46.2 GSI

**9.8%** of total lluka spend

Top material groups Services and fuel and lubricants



# **UNITED KINGDOM**

71.5 GSI

1.6%

of total Iluka spend

Top material groups Freight and cartage and contracted services



# **USA**

**71.7** GSI

2.8%

of total Iluka spend

Top material groups Contractor mining/ major earth and **Contracted services** 





# **CYPRUS**

**63.4** GSI

10.0%

of total Iluka spend

Top material groups **Equipment spares** and service



# **SOUTH AFRICA**

**47.4** GSI

1.1% of total lluka spend

Top material groups Consultancy services



# **CHINA**

**27.4** GSI

1.5% of total Iluka spend

Top material groups

Storage and handling and freight and cartage



# **GHANA**

**27.6** GSI

1.7% of total lluka spend

Top material groups Mining equipment, plant spares and consumables and tyres



# **SINGAPORE**

**32.8** GSI

**2.1%** of total lluka spend

Top material groups Bulk freight and cartage

# **ACTION**

The actions outlined below demonstrate the work undertaken to assess and address the risk of modern slavery in Iluka's supply chain.

	COMMITMENT	STATUS	2021 OUTCOME
ASSESSING OUR RISK	Engage and undertake a risk assessment of our local suppliers in Sierra Leone who may not be on our PRONTO vendor management system	<b>√</b>	Ongoing assessment of risks
	Continued implementation of screening and assessment of vendors (including SRL), prioritising completion of an SAQ by those assessed by lluka as high risk	✓	SAQ screening successfully implemented enabling high level identification of modern slavery risk in Tier 1 suppliers. All new vendors subject to screening
GOVERNANCE	Develop a Supplier Code of Conduct	$\checkmark$	Completed
	Review the efficiency and efficacy of Iluka's grievance mechanisms (and STOPline)	✓	Review completed identifying potential improvements to accessibility and knowledge to persons who may be subject to modern slavery
ACTION	Conduct our first supplier audits	×	3rd party review of Iluka processes and returned supplier SAQs undertaken in preference to supplier audit
ACTION	Support our suppliers through sharing our knowledge of human rights and modern slavery, primarily through our training materials	✓	Training developed and provided to all suppliers broaden the knowledge base within Iluka's supply chain

In addition to the above commitments the following additional workstreams have progressed.

	COMMITMENT	STATUS	2021 OUTCOME	
GOVERNANCE	Review of modern slavery risk assessment framework	$\checkmark$	3rd party review completed	
ASSESSING OUR RISK	Assessment of modern slavery risk within SRL workforce	✓	Completed	
	Vendor portal development and implementation	$\checkmark$	Implemented	

## **OUR COLLABORATIVE EFFORTS**

Iluka recognises the importance and benefit of a collective approach to managing shared modern slavery risks. We facilitate and participate in the Human Rights Resources and Energy Collaborative (HRREc), formerly known as the Western Australian Modern Slavery Collaborative (WAMSc).





The HHREc was co-founded by a number of companies including Iluka, and provides a forum for practitioners to collectively network and share knowledge pertaining to the implementation of the Australian *Modern Slavery Act* (2018).

Following the development of an SAQ in 2020, additional workstreams have been developed focussing on remedy and shipping. In 2021 the group (as WAMSc) was awarded the financial times Innovative Lawyers 2021 Award (Asia-Pacific) in the in-house legal team – social justice category.

#### **REMEDY**

If a modern slavery incident is identified, Iluka will seek to mitigate the situation in line with Iluka's values, policies, standards and internal incident management systems. Grievance mechanisms are in place and we are working to improve their effectiveness as detailed earlier in this Statement.

If Iluka identifies that it has caused or contributed to a negative human rights impact (such as modern slavery), the actions considered will include:

- · cessation of the action causing the harm;
- · use of leverage to mitigate any harm; and
- remediation for those who have been impacted.

## **COVID-19 IMPACTS**

Like all businesses, COVID-19 continued to have an impact on lluka's business and operations. Iluka sites experienced varying levels of supply shortages, and in certain cases sought supply from alternate vendors. The approach of requiring all new vendors to complete an SAQ was employed to reduce any potential increase in risk brought about by changes in our supply chain.

# **LOOKING AHEAD TO 2022**

During the year we continued to embed systems and processes to operationalise Iluka's response to modern slavery as part of our everyday business. We have come to understand the difficulties in practically and genuinely assessing modern slavery and identifying occurrences within our supply chain. Iluka will continue to partner with industry groups and specialist organisations with depth of expertise in Human Rights Due Diligence to support its work programme. In 2022 Iluka will:

01

Develop targeted and informative education, training and awareness support for both potential high risk suppliers and lluka employees 02

Implement the revised Supplier Risk Framework to enable continued screening and more focused assessment of vendors 03

Finalise an Iluka remediation protocol that adapts the HRREc generic 'Response & Remedy Framework' for use by Iluka

04

Engage and collaborate with major suppliers in respect of Iluka's ongoing work programme 05

Support our suppliers through sharing our knowledge of human rights and modern slavery, primarily through our training materials **06** 

Adopt its Supplier Code of Conduct

07

Support through HRREc further knowledge building and sharing of good practice

80

Revise the HSEC incident classification and reporting guideline to include hazards or incidents relating to modern slavery associated with lluka's operations 09

Complete a review of Iluka's management of modern slavery risks within its workforce (excluding SRL)

# **APPROVAL**

This statement was endorsed by Iluka's Executive and approved by the Board of Iluka Resources on 15 June 2022.

Tom O' Leary

Chief Executive Officer of Iluka Resources Limited

Date: 24 June 2022

# **APPENDIX**

The sections of the Statement that address the mandatory content required by the Australian *Modern Slavery Act (2018)* are outlined below.

Australian <i>Modern Slavery Act (2018)</i> mandatory reporting criteria	Iluka response	Page number
Identify the reporting entity covered by the Modern Slavery Statement	<ul><li>About this statement</li><li>Who we are</li></ul>	2 4
Describe the structure, operations and supply chain of the reporting entity	<ul><li> Who we are</li><li> Our Locations</li><li> Our Operations</li><li> Our supply chain</li></ul>	4 5 6 9
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	<ul><li>Our supply chain</li><li>Our risk profile</li></ul>	9
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address the risks, including due diligence and remediation processes	<ul><li>Governance</li><li>Assessing our risk</li><li>Action</li></ul>	12 15 17
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Due diligence	13
Describe the process of consultation with any entities that the reporting entity owns or controls	<ul> <li>Modern Slavery Working Group</li> </ul>	13
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul> <li>Looking ahead to 2022</li> </ul>	19