

Modern Slavery Statement

Sumitomo Metal Mining Oceania Pty Ltd FY25

This statement covers the activities of Sumitomo Metal Mining Oceania Pty Ltd (ACN 059 761 125) during the year ended 31 December 2025 (for the period 1 January 2025 to 31 December 2025).

References in this statement to 'SMMO', 'we', 'our' and 'us' are references to Sumitomo Metal Mining Oceania Pty Ltd. Also references in this statement to 'our Group' and 'SMM Group' are references to Sumitomo Metal Mining Co., Ltd. and its consolidated subsidiaries.

This modern slavery statement is submitted under the *Modern Slavery Act 2018* (Cth) (**the Act**) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of Sumitomo Metal Mining Oceania Pty Ltd on 26th June 2026.

Modern slavery – our fundamental approach

At SMMO, we respect the human rights of those affected by our business activities. We are committed to responsible procurement and production, with the aim of preventing and remedying modern slavery, human rights violations, environmental pollution, corruption, and other issues in our supply chain.

We recognise that business operations in resource industries require large-scale development in many instances, which means they often have significant impacts on local communities. Mineral resource development in particular poses risks of causing human rights violations including modern slavery. In light of these business characteristics, we take measures to respect the human rights of stakeholders with an emphasis on local residents and indigenous peoples, employees in the supply chain, and our employees.

SMMO supports the UN Guiding Principles on Business and Human Rights, and our Group Corporate Philosophy espouses “respect for all individuals” as its foundation.

In accordance with our Group’s human rights policy, we promote initiatives to uphold human rights, including the implementation of due diligence and the operation of grievance (remedy) mechanisms.

Our structure

Sumitomo Metal Mining Oceania Pty Ltd is a company incorporated in Australia and our registered office is located at Suite 2702 Level 27, 420 George Street, Sydney, NSW, 2000.

Sumitomo Metal Mining Oceania Pty Ltd is a subsidiary of Sumitomo Metal Mining Co., Ltd. (**SMM**), headquartered in Japan. The SMM Group conducts a diversified range of business activities across mineral resources exploration and development, copper and nickel smelting and refining, and the production of advanced materials including battery materials.

Sumitomo Metal Mining Oceania Pty Ltd itself does not have any owned and controlled entities.

Our operations

We are a mining company carrying out mineral exploration and mine operation.

We engage 8 employees and no contractors.

Our core operations are in Queensland and New South Wales.

SMMO holds a majority beneficial interest in the Mt Isa East Joint Venture. The Mt Isa East Joint Venture is an unincorporated joint venture operated by Hammer Metals Limited and its subsidiaries and established for exploration of copper and gold in areas between Mount Isa and Cloncurry in Queensland.

We also hold interests in joint ventures that we do not operate. In each case, a party other than SMMO serves as operator for the joint venture, and the selection of and contracting with suppliers necessary for operations is carried out by the operator.

Our non-operated joint ventures are set out in the table below. Please note that we are currently in the process of withdrawing from the Bullrush Exploration Joint Venture.

Joint venture	SMMO Interest	Operator
Northparkes Mine	13.3%	Evolution Mining Limited
Mt Isa East Joint Venture	63.4%	Mt. Dockerell Mining Pty Ltd Mulga Minerals Pty Ltd Hammer Metals Limited
Bullrush Exploration Joint Venture	0%*	Mulga Minerals Pty Ltd

* SMMO has 0% beneficial interest in this joint venture as it has not completed the monetary contribution in the initial phase (earn-in period) required to acquire the first beneficial interest.

Our supply chain

We work with a relatively small number of direct suppliers (currently approximately 30 recurring suppliers) that are all Australian-based entities or international companies with Australian operations.

The goods and services in our supply chain are predominantly corporate/administrative in nature with limited direct procurement of labour-intensive goods or raw materials.

The main types of goods and services that we procure are:

- exploration and field services;
- real estate and accommodation;
- corporate/building services including office maintenance services, cleaning and security;
- information and communications technology including hardware and software, printers, audio/visual equipment, data room services, desk phones and mobile phones used by our employees;
- software licensing and maintenance;
- external professional services including financial services, taxation, legal, insurance, consulting and professional and personal development;
- whistleblowing and compliance;
- media and subscriptions; and
- office consumables, including stationery, amenities and kitchen consumables.

We also have a number of indirect suppliers, including through our minority interest joint ventures where the supply chain is managed by the relevant joint venture operator. The selection of and contracting with suppliers necessary for operations is carried out by the operator.

Modern slavery risks

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

At SMMO, we use an approach to human rights protection based on the Guiding Principles on Business and Human Rights approved by the United Nations Human Rights Council in 2011. This is a series of processes for performing preventive investigations to avoid and mitigate the negative effects that organisations have on human rights, and for taking appropriate corrective action based on the findings.

With respect to modern slavery, we utilised a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk.

These risk factors are based on the risk indicators and information published in the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

We are committed to continuous improvement of our modern slavery risk assessment methodology. Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk
Sector / Industry	The mining and resources exploration sector globally carries elevated modern slavery risks, particularly in relation to labour exploitation in extractive industries and ancillary services. SMMO acknowledges modern slavery risks in mineral resource development. However, SMMO's own activities are limited to exploration-stage joint venture participation, participation in a mining extraction joint venture as a non-operating minority interest holder and corporate administration, which present lower inherent sector risks than operational mining.
Product / Service	SMMO's direct supply chain predominantly comprises corporate and administrative services (professional services, software, office facilities, insurance, telecommunications). These categories are generally assessed as lower risk. However, sub-categories such as office cleaning (if applicable), property services, and equipment supply may carry higher risks through sub-contracting arrangements.
Geographic	Our suppliers are all are Australian-based entities or international companies with Australian operations. Australia is assessed as a lower-risk jurisdiction.
Specific Entity	SMMO is not currently aware of any specific entities within its operations and supply chains that present a risk of modern slavery.
JV Supply Chain	In each case, a party other than SMMO serves as operator for its joint ventures, and the selection of and contracting with suppliers necessary for operations is carried out by the relevant operator. SMMO has limited visibility over the supply chains of these operations.

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery.

Due diligence

As noted above, we undertook an initial risk assessment to identify any key modern slavery risks that existed within our operations and supply chains.

We recognise this is an area requiring further development and have outlined our planned actions in the "Looking forward" section below.

Governance and accountability framework

SMMO's approach to modern slavery is governed through its relationship with its parent company, SMM.

The SMM Group has established a Sustainability Committee and a number of management-system working groups, including a Responsible Mineral Sourcing Working Group and a Supply Chain Management Working Group (established March 2025).

SMMO as well as its directors and employees are required to comply with the SMM Group's human rights policy.

Policies and procedures

In our existing governance framework, we have a number of policies and procedures to ensure we have frameworks to enable us to assess and address modern slavery risks, including:

- **SMM Group CSR Procurement Policy:** This policy was established to articulate the SMM Group's commitment to building a sustainable supply chain by giving due consideration to social issues such as human rights and the environment across all procurement activities, not limited to mineral procurement. The policy has since been renamed the Sustainable Procurement Policy and continues to be applied.
- **SMM Group Policy on Human Rights:** This policy commits to prohibiting child labour and forced labour, non-discrimination, and anti-harassment, aligned with international norms including the International Bill of Human Rights and ILO Core Labour Standards.
- **Outsourced whistleblowing system:** SMMO engages Stopline Pty Ltd to provide an independent, outsourced whistleblowing system available to employees and external parties.
- **SMM Group Grievance Mechanisms:** The SMM Group maintains an internal reporting system for SMM Group employees and participates in JaCER (Japan Center for Engagement and Remedy), a third-party grievance platform available to external stakeholders. SMM is a founding member of JaCER. In FY2024, zero cases of grievances about the SMM Group were received through JaCER.

Training

We conducted targeted training for all new employees on SMM's Code of Conduct, which is based on respect for human rights, and human rights education.

Contracts and supplier engagement

All suppliers are subject to a review at the time of contract signing to determine whether they are located in countries or industries with a high risk of violating anti-slavery laws.

Future actions

We have also planned to undertake further actions to identify and address our modern slavery risks as set out in the 'Looking forward' section below.

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions by confirming whether there have been any reported incidents of modern slavery in our operations or supply chains during the reporting period (for example through our grievance processes).

We also monitor our performance against a number of key performance indicators. These include the number of suspected or identified modern slavery incidents.

With a focus on continuous improvement, we are committed to reviewing the effectiveness of the actions we have planned to undertake which we have set out in the 'Looking forward' section below.

Looking forward

As this is our inaugural statement and we are developing our modern slavery framework, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

Going forward, we will focus on:

- providing training to relevant staff to raise awareness of modern slavery risks and how they may arise in our business; and
- conducting a desk-based survey on how existing suppliers are complying with the Act.

In order to assess the effectiveness of these actions, we will:

- track the percentage of employees who have completed training on modern slavery; and
- track the percentage of the suppliers we surveyed regarding their compliance with the Act.

Related activities

SMMO conducts its business activities with respect for human rights.

The SMM Group participates in industry sustainability initiatives, including alignment with the Responsible Minerals Initiative (RMI) and third-party audits at its smelters and refineries. SMM is also a founding member of JaCER, a multi-stakeholder grievance mechanism.

Consultation

This criterion does not apply to Sumitomo Metal Mining Oceania Pty Ltd as we do not own or control any other entities.

This statement was approved by the Board of Sumitomo Metal Mining Oceania Pty Ltd in their capacity as the principal governing body of Sumitomo Metal Mining Oceania Pty Ltd on 26th June 2026.

This statement is signed by Jiro Uesugi in his role as Managing Director of Sumitomo Metal Mining Oceania Pty Ltd on 26th June 2026.

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Jiro Uesugi

Statement Annexure

Mandatory criteria

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

Requirement	Page Number
(a) Identify the reporting entity.	1
(b) Describe the structure, operations and supply chains of the reporting entity.	1 – 2
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2 – 3
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	3 – 4
(e) Describe how the reporting entity assesses the effectiveness of such actions.	4
(f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	5
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	4 – 5*

* The "Looking forward" section on pages 4-5 and the "Related activities" section on page 5.