



**AMCI (WA) Pty Ltd**  
ACN 120 952 150

## **Modern Slavery Statement**

2024

## 1. Introduction

This statement covers the activities of AMCI (WA) Pty Ltd (ACN 120 952 159) and its wholly owned entity AMCI (IO) Pty Ltd (ACN 123 253 485) (“**the Group**”) for the year ended 31 December 2024.

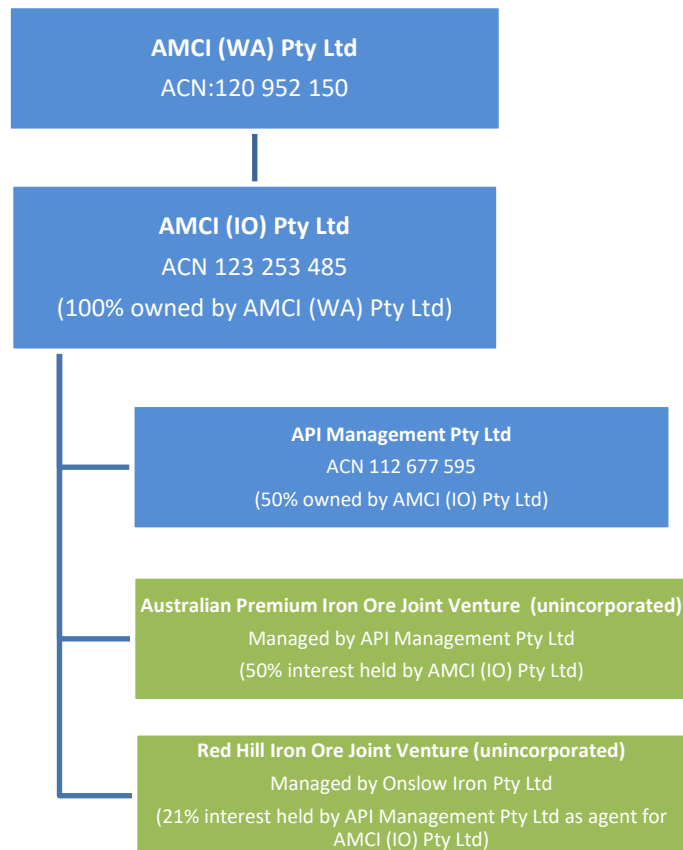
This is the Group’s first modern slavery statement and sets out the actions it is taking to identify and address modern slavery in its operations and supply chains.

The threshold of \$100 million revenue was reached for the first time by the Group on 30<sup>th</sup> November 2024. After reaching the threshold the Group recently commissioned a review of its existing policies and procedures to ensure modern slavery risks are adequately identified and addressed. This review is continuing at the time of this statement being prepared and released. The Group will have completed this review before the next modern slavery statement is reported.

## 2. Our Structure and Operations


AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd are companies incorporated in Australia with their registered office located at Level 32 Gateway Tower, 1 Macquarie Place, Sydney, Australia.

A simplified corporate structure chart of the AMCI (WA) group is provided below:



AMCI (WA) Pty Ltd is a holding company owning a 100% interest in AMCI (IO) Pty Ltd.

AMCI (IO) Pty Ltd is a joint venture partner in two unincorporated joint ventures engaged in iron ore mining activity in the Pilbara in Western Australia.



API Management Pty Ltd (“APIM”), which AMCI (IO) Pty Ltd jointly owns with Aquila Steel Pty Ltd, acts as the Manager of the Australian Premium Iron Ore Joint Venture (“**APIJV**”). The APIJV holds exploration tenements in the Pilbara region of Western Australia.

APIM holds an interest in the Red Hill Iron Ore Joint Venture (“**RHIOJV**”) as agent for AMCI (IO) Pty Ltd and Aquila Steel Pty Ltd. The RHIOJV is the owner of the Onslow Iron Ore project in the Pilbara region of Western Australia. The Onslow Iron Ore project’s first ore on ship was at the end of May 2024.

### **3. Our supply chain**

AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd do not have any employees. The directors of these companies have engaged contractors to perform various services on their behalf.

APIM is the manager of the APIJV. APIM employs some staff directly, and also has a number of staff members seconded from Aquila Resources Pty Ltd (ACN 092 002 769). Aquila Steel Pty Ltd and Aquila Resources Pty Ltd are subsidiaries of the Baosteel group.

Onslow Iron Pty Ltd (ACN 649 012 395) is the manager and operator of the RHIOJV. Any staff engaged in the Red Hill Iron Ore joint venture operations are engaged by Onslow Iron Pty Ltd in its capacity as manager and not directly by the joint venture. Onslow Iron Pty Ltd is a subsidiary of Mineral Resources Limited.

AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd are not the manager or operator of either of the joint venture operations and therefore their supply chain is limited and consists of the engagement of a small number of Australian based contractors who are responsible for corporate compliance.


### **4. Risk of Modern Slavery in our operations**

AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd consider their direct operations to be at low risk of modern slavery due to the nature of its investment activities in Australia and the fact they have no employees.

Whilst the Groups direct operational involvement is limited, we have identified that as a joint venture partner it may be at risk of indirectly contributing to modern slavery practices in Australia through the entities it engages as contractors and the entities who have been appointed to act as Manager for the joint ventures it holds interests in. These Contractors and Managers do engage staff to perform services on the Groups behalf.

### **5. Actions to assess and address risk**

In respect of the Group participating in its joint ventures as a non-operator and non-manager, the Group is not in a position to directly control the supply chains for those investments and somewhat relies on the operator or manager of the site to follow its due diligence processes, and risk management to identify countries with a high risk of modern slavery and high risk goods and services. Whilst the Group relies primarily on their joint venture partners for supply chain management, the Group aims for continuous improvement and will consider implementing appropriate actions in the future to enhance its efforts to assess and address modern slavery risks further.



The Group has undertaken a review of the latest modern slavery statement of the RHIOJV Manager, Mineral Resources Limited, to assess the actions taken to assess and address modern slavery risks in their operations. These include; policies and procedures (such as their Human Rights Policy, supplier code of conduct and supplier screening processes); a risk management framework and risk assessments, audits and due diligence processes; whistleblower policies and procedures; and effectiveness assessments in relation to the mitigation of modern slavery practices.

Whilst APIM itself does not issue a modern slavery statement, the company has a whistleblower policy in place for employees to report any misconduct which includes modern slavery issues. The APIM recruitment processes include sourcing employees from the Australian labour force wherever possible and ensuring employee remuneration is in line with Australian salary benchmarks. APIM has a detailed contract procurement process in place which includes requiring contractors to engage Australian citizens and permanent residents unless a legitimate reason exists as to why Australian labour cannot be sourced for the work. Contractors of APIM are therefore required to comply with all applicable Australian labour laws including requirements to meet minimum thresholds and providing a safe work environment.

The Group has also undertaken a review of the latest available modern slavery statement of Aquila/Baosteel who provide a number of their employees to our jointly owned company APIM on secondment. We are continuing to work with Aquila to receive more detailed information about their policies and procedures and risk management framework to identify and assess modern slavery. We have received assurances from Aquila that all staff seconded to APIM are based in Australia and are in compliance with Australian industrial relation standards.

No issues were identified through the current review process. AMCI remains committed to ongoing engagement and collaboration with its joint venture partners to continuously evaluate and enhance modern slavery risk assessment and mitigation strategies in the future.

The contractors engaged by the Group directly have worked for the Group for many years and all senior experienced highly paid Australian professionals who are at low risk of being exploited.


## **6. Assessing the effectiveness of those Actions**

As a non-operator joint venture interest holder, AMCI somewhat relies on their joint venture managers to assess the effectiveness of their actions taken to respond to modern slavery risks in their operations and supply chains.

Enquires have been made by AMCI of both Managers to request details of any breaches and any other weaknesses in their processes. No risks or concerns have been highlighted by either party.

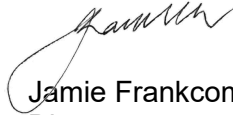
## **7. Consultation and Approval**

In preparing this modern slavery statement, the Group consulted with the entities appointed as the Managers of its joint venture operations and reviewed their most recent published modern slavery statements.



This statement has been approved and endorsed by the board of directors of AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd.

Signed and approved on 4 June 2025 by:



Jamie Frankcombe  
Director