



# Modern Slavery Statement

This Modern Slavery Statement for the Roy Hill Group is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) for the financial year 1 July 2023 – 30 June 2024 (Statement).

# Modern Slavery Statement

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## From the CEO

As the CEO of Roy Hill, I am proud to lead an organisation that is dedicated to upholding the highest standards for our employees, suppliers, and the entire Roy Hill community. We are strongly committed to conducting our business ethically and fostering strong relationships with our suppliers based on mutual trust and respect.

Roy Hill is committed to actively combating modern slavery and ensuring we have a robust framework in place to identify and address any instances within our supply chain and operations.



In FY24, our focus was on strengthening and enhancing our modern slavery risk management and due diligence processes, including a compliance portal for thorough supplier screening.

We have helped our people understand and address modern slavery risks and conducted in-depth investigations into high-risk supply chains.

We have actively collaborated with industry experts and participated in forums to drive continuous improvement and transparency. These efforts, along with our annual Care Survey, reinforce our dedication to combating modern slavery and maintaining a responsible supply chain.

We are dedicated to year-on-year improvements and prioritise working closely with our suppliers and the wider industry to contribute to meaningful change.

It is with great pride that I present our fifth annual statement detailing our efforts to combat modern slavery. We welcome any feedback and remain dedicated to making a positive impact in this critical area.

A handwritten signature in dark ink, appearing to read 'G. Veldsman', written in a cursive style.

Gerhard Veldsman  
CEO Roy Hill

Date

# Modern Slavery Statement

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## 1. Identify the reporting entity

This statement addresses the risk of slavery and human trafficking in the business and supply chains of Roy Hill Holdings Pty Ltd, pursuant to the Modern Slavery Act 2018 (Cth) (the Act) for the reporting period 1 July 2023 to 30 June 2024. Roy Hill Holdings Pty Ltd ACN 123 721 077 (ABN 71 123 721 077) is a reporting entity as defined in the Act.

This statement is made on behalf of all companies forming the Roy Hill Group.

In this statement, any reference to Roy Hill or the Roy Hill Group means Roy Hill Holdings Pty Ltd, its four wholly owned subsidiaries, Roy Hill Iron Ore Pty Ltd ACN 123 722 038 (ABN 18 123 722 038), Roy Hill Infrastructure Pty Ltd ACN 130 249 633 (ABN 60 130 249 633), Roy Hill Operations Pty Ltd ACN 168 771 355 (ABN 77 168 771 355) and Roy Hill Logistics Pty Ltd ACN 627 019 489 (ABN 61 627 019 489) and its two partly owned subsidiaries, Rinehart Developments Pty Ltd ACN 654 973 583 (ABN 97 654 973 583) and HanRoy Iron Ore Projects Pty Ltd (ABN 56 661 341 975).

Roy Hill's **Modern Slavery Policy** states that Roy Hill opposes the use of Modern Slavery practices and is committed to addressing the risk of modern slavery occurring in its operations or supply chains. Roy Hill also expects its suppliers and contractors to adhere to the same high standards in their own operations and supply chains.

Roy Hill's internal **Modern Slavery Specification** provides the framework for addressing modern slavery risks in its operations and supply chains. The Specification sets out:

- accountabilities
- the approach to operations and supply chain risk assessment and due diligence
- on-boarding and contracting requirements
- the auditing and compliance approach
- training proposals
- confidential internal reporting and annual external modern slavery reporting
- the approach to remediation of any issues arising.

The above documents will be reviewed and updated annually to reflect Roy Hill's ambition and approach to addressing modern slavery risk in the business.



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## 2. Structure, Operations and Supply Chains

### 2.1 Structure

Each member of the Roy Hill Group is a proprietary limited company.

Roy Hill Iron Ore Pty Ltd, Roy Hill Infrastructure Pty Ltd, Roy Hill Operations Pty Ltd and Roy Hill Logistics Pty Ltd are each 100% owned by Roy Hill Holdings Pty Ltd.

Rinehart Developments Pty Ltd and HanRoy Iron Ore Projects Pty Ltd are 50% owned (directly or indirectly) by Roy Hill Holdings Pty Ltd. The other 50% ownership interest in those companies is held by Hancock Prospecting Pty Ltd.

Roy Hill Holdings Pty Ltd is 70% owned by Hanrine Holdings Pty Ltd (being a wholly owned subsidiary of Hancock Prospecting Pty Ltd), 20% owned by KJTC Pty Ltd and 10% owned by POSCO. Roy Hill Holdings Pty Ltd has four wholly owned subsidiaries and two partly owned subsidiaries, as described in section 1 above.

Roy Hill's corporate structure is made up of the Roy Hill board of directors, the Executive Team and its operational areas (mine, port, rail and corporate). Roy Hill's remote operations centre, corporate headquarters and supply buildings are located at Perth Airport, West Australia. Its registered office is HPPL House, Level 3, 28-42 Ventnor Avenue, West Perth, WA 6005. Roy Hill has a representative office located in Shanghai, which conducts market research and liaises with Chinese steel mills on behalf of Roy Hill.

As of 30 June 2024, the Roy Hill Group employed 3,611 employees across its site operations, Port Hedland and support in Perth; embedded contractors accounted for approximately 99 positions.

### 2.2 Operations

The companies forming the Roy Hill Group together own and operate an integrated iron ore mining, port, and rail operation in the Pilbara region of West Australia.

Roy Hill currently produces and exports approximately 60 million tonnes (Mtpa) of iron ore per annum to international markets, with approvals in place to increase shipments to 70 Mtpa.

Roy Hill's mine is located approximately 115km north of Newman and incorporates conventional open pit, bulk mining operations with a 60Mtpa wet processing facility. Processed ore is sent 344 kilometres on Roy Hill's heavy haul rail line to a purpose-built two-berth port facility at Port Hedland where it is shipped to key markets including Japan, Korea, China and Taiwan. As part of Roy Hill's ownership agreement, equity partners, Marubeni, POSCO and China Steel Corporation purchase just under half at the current full production rate of 60Mtpa.

Roy Hill has invested significantly in the comfort and lifestyle of its fly-in fly-out workforce with high quality accommodation camps at its mine as well as at its port and rail facilities in Port Hedland. Amenities include a wide variety of food options, mixed and women's only gymnasiums, a large multi-lane swimming pool, a variety of sporting facilities and free Wi-Fi.

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Roy Hill has numerous physical and mental wellbeing initiatives in place, including a free Employee Assistance Provider and a Chaplaincy program which is available to all its employees, contractors and their families. Further, it provides an even-time rosters for its FIFO staff.

## 2.3 Supply Chain

Roy Hill sources products and services from Australia and internationally. During FY24 we engaged with 1599 direct suppliers in 22 countries, with 77.28% of spend occurring with suppliers located in Australia.

For local operations in the Pilbara, Roy Hill gives priority consideration to Kariyarra, Palyku and Nyiyaparli owned businesses for contracting opportunities. Roy Hill works with Native Title Parties to develop employment, training and business opportunities for local communities.

The table below outlines Roy Hill's spend by country for the FY24 period:

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| Country                | % Net Value |
|------------------------|-------------|
| Australia              | 77.28%      |
| Singapore              | 15.77%      |
| Germany                | 4.12%       |
| Malta                  | 0.92%       |
| British Virgin Islands | 0.65%       |
| China                  | 0.47%       |
| Greece                 | 0.43%       |
| Japan                  | 0.19%       |
| South Korea            | 0.4%        |
| United Kingdom         | 0.3%        |

Roy Hill also has suppliers in USA, Hong Kong, Switzerland, South Africa, Norway, New Zealand, Israel, and Sweden, however, the net value of spend for suppliers in each is less than 0.2%.

Roy Hill's supply chain covers a broad range of goods and services including:

1. Construction materials;
2. Heavy Mining Equipment and Vehicles;
3. Consumables and parts;
4. Rotable Spares;
5. Fuel;
6. Freight & Shipping;
7. Equipment Hire;
8. Spare Parts;
9. Clothing;



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- 10. Labour recruitment services;
- 11. Business services;
- 12. Office products and furniture;
- 13. Health products and PPE; and
- 14. Agricultural goods and services

Roy Hill's Procurement team is responsible for purchasing goods and services for the operational requirements of the business.

Roy Hill expects its suppliers and contractors to adhere to our high standards in their own operations, including ensuring they are not, in any way, involved in modern slavery. Roy Hill's Modern Slavery Procedure provides a framework to ensure appropriate levels of Supplier engagement in relation to mitigating modern slavery risks. Roy Hill will continue to work closely with its Supplier's to ensure it delivers on its commitments both within the Roy Hill operation and its supply chain.



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## 3. Describe risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities the reporting entity owns or controls

Roy Hill recognises that modern slavery is a breach of a person's fundamental right to live freely. Walk Free foundation has highlighted that the problem is getting worse, with the most recent figures showing an estimated increase of 10 million additional instances globally since the previous estimates were released in 2017. Modern slavery includes eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. Roy Hill acknowledges that modern slavery sits at the most serious end of a spectrum of exploitative labour practices and human rights abuses.

Roy Hill recognises the inherent risk of modern slavery in global supply chains of which it is a part and is committed to working with suppliers to address modern slavery risks.

### 3.1 Modern Slavery risks in operations

Roy Hill's operations are located in West Australia and our employees include engineers, geologists, technicians, operators and drivers, accountants, administrators, lawyers, heritage specialists, environmental scientists, electricians, shipping and marketing specialists and other professionals. Employees are paid in accordance with Roy Hill's remuneration and recruitment policies and at rates significantly above applicable Award rates.

Roy Hill's workforce is approximately 76.7% fly in fly out (**FIFO**). Roy Hill understands the challenges that face FIFO workers and works hard to support its FIFO workers so that they can thrive. Not only does Roy Hill provide high quality accommodation services at its mine site and its port, but it also invests time in supporting its staff to make smart health, social and safety choices. Roy Hill has policies related to well-being, training and diversity and inclusion, which enable employees to thrive. These policies and protections, combined with Australia's low ranking in the Global Slavery Index, mean that Roy Hill considers that the risk of modern slavery occurring in its operations to be low.

Finally, Roy Hill acknowledges that as part of the mining and explorations industry, there may be broader human rights impacts in its operations, despite policies and protections to mitigate risk. These activities can impact rights related to workplace health and safety, labour, Indigenous peoples, water and sanitation and the rights of community members who live near its operations. Roy Hill acknowledges that it needs social license to operate, and actively supports the local community, particularly the Traditional Owners affected by its operations.

### 3.2 Modern Slavery risks in supply chain

Roy Hill's supply chain is broad, complex and of a global nature. Roy Hill has identified that it acquires goods and services from higher risk industries, such as garments, PPE, electronics, construction and shipping. Roy Hill also has suppliers located in higher risk countries, as identified by the Global Slavery Index. Roy Hill has developed methods to assist in identifying such risks during various stages of the procurement cycle and it has not yet discovered any instances of modern slavery.



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Approximately 2.5% of Roy Hill's on-site workforce are embedded contractors, with some additional contractors from time to time. Roy Hill acknowledges that hiring externally could increase the company's exposure to poor labour practices and modern slavery. However, Roy Hill prefers to directly employ its workforce rather than rely on labour hire contractors, which provides Roy Hill with full visibility over their working conditions and terms. For the remaining labour hire contractor workforce, Roy Hill manages modern slavery risk through the terms of the labour hire agreements.



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## 4. Actions taken

### 4.1 Actions taken in the reporting period

In this fifth year of reporting, Roy Hill's actions focused on enhancing risk management due diligence through updating its Modern Slavery Procedure, implementing a Modern Slavery compliance portal, providing targeted employee training, conducting in-depth industry investigations, and actively collaborating with industry experts to strengthen our modern slavery response framework.

#### 4.1.1 Modern Slavery Procedure

During this reporting period, Roy Hill updated its Modern Slavery Procedure to include additional tools to further enhance our risk management and due diligence process. The Modern Slavery Procedure requires all suppliers engaged by Roy Hill to complete a Modern Slavery Questionnaire. Their responses are then assessed using the Modern Slavery Assessment Tool.

In FY24, the Modern Slavery Procedure was updated to include the Modern Slavery compliance portal. Where a supplier's questionnaire responses are deemed 'at-risk' by the Modern Slavery Assessment Tool, the supplier undergoes additional screening and analysis through the Modern Slavery compliance portal. The screening will generate a due diligence report outlining any findings and risks related to the supplier. If modern slavery risks are identified, this is escalated to the Modern Slavery Governance Team to undertake further due diligence and investigation.

#### 4.1.2 Training and Awareness

Recognising the importance of capacity building and raising awareness, Roy Hill rolled out modern slavery training to those who have roles which may interface with the issue of modern slavery. The training enabled employees to understand the legislative requirements under the Act and Roy Hill's compliance with the Act. It also enabled our employees to identify, assess, and address modern slavery risks, and understand their roles and responsibilities relating to modern slavery within the company.

By enhancing employee knowledge and engagement, Roy Hill aims to continuously improve our modern slavery response framework and strengthen our ability to identify and address potential risks in our operations and supply chains.

#### 4.1.3 Modern Slavery Portal

In FY24, Roy Hill integrated a Modern Slavery compliance portal into its business processes. All 'at-risk' suppliers undergo further screening through this portal, enabling Roy Hill to identify and monitor any modern slavery concerns related to a supplier. The implementation of this portal enhances our ability to track progress, identify trends, and share best practices, ultimately strengthening our overall modern slavery response framework. Moving forward, Roy Hill will leverage this portal to drive improvements and foster greater transparency in our efforts to combat modern slavery within our operations and supply chains.

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## 4.1.4 Conducting In Depth Industry Investigations

Roy Hill conducted in-depth investigations into high-risk areas and products within its supply chain. These reviews involved assessing the industry sector, supplier practices and risks within the supply chains. This year, Roy Hill completed thorough investigations on solar panel supply chains and personal protective equipment (**PPE**) supply chains. The findings and recommendations from these reviews were insightful and further developed our understanding of the risks and challenges in these industries.

## 4.1.5 Collaboration and Engagement

Roy Hill actively collaborates with industry experts to enhance our understanding of emerging modern slavery risks and to share best practices for addressing these issues. In FY24, Roy Hill joined the Human Rights Resources and Energy Collaborative (**HRREC**), a forum for resources and energy organisations to contribute to the effective implementation of the Act. Furthermore, as a member of the Minerals Council of Australia, Roy Hill completed a self-assessment on preventing child and forced labour to better understand, evaluate, and manage our modern slavery performance.

In addition, Roy Hill uses internal tools such as its annual Care Survey to gather employee feedback, which helps measure workforce satisfaction, wellbeing, and physical and psychological safety.

## 4.2 Planned actions

Roy Hill has planned the following activities to further embed modern slavery risk prevention:

| Goal   | Target Metric  |
|--|--|
| <b>Supply Chain Mapping</b><br>Map modern slavery risks within Roy Hill's sourcing categories to gain greater visibility of supply chains in high-risk categories and to better understand risk areas. | Higher-risk categories mapped out in Roy Hill's sourcing categories and communicated to relevant teams.            |
| <b>Modern Slavery Risk Assessment Tool</b><br>Review the Modern Slavery Risk Assessment Tool and update country risk, product risks and category risks.  | Review and update Modern Slavery Risk Assessment Tool.   |
| <b>Modern Slavery Site Visit Checklist</b><br>Develop a Modern Slavery Site Visit Checklist to assist our staff in observing workplace and labour conditions at supplier sites.                        | Launch Modern Slavery Site Visit Checklist.  |
| <b>Modern Slavery Portal</b><br>Further imbed the Modern Slavery Portal into the supplier onboarding process.  | Modern Slavery Portal is utilised, and all 'at-risk' suppliers have undergone compliance screening and monitoring. |

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|---|--|
| <b>Employee Training and Awareness</b><br>Roll out an online Modern Slavery training module to those in roles which may interface with the issue of Modern Slavery. | Rollout online training module.  |
| <b>Collaboration and Engagement</b><br>Continue to engage with industry groups and find opportunities for participation in new forums and groups.                   | Ongoing participation in Modern Slavery forums, including HRREC and Mineral Council of Australia and any forums new to Roy Hill. |
| <b>Grievance Reporting Channels</b><br>Strengthen the accessibility, inclusivity and communication of Roy Hill's modern slavery grievance reporting channels        | Relevant documents updated and communication delivered to business.  |
| <b>In Depth Industry Reviews</b><br>Conduct in depth investigation into high-risk areas/products within Roy Hill's supply chain                                     | Minimum of 2 high risk areas/products investigated   |



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## 5. Assess effectiveness

Roy Hill reviews the effectiveness of its modern slavery risk management process on an annual basis. Below is a table tracking progress against commitments made in Roy Hill's fourth Modern Slavery Statement:

| Activity   | Status  |
|--|---|
| <b>Complete required updates to suite of Modern Slavery documents in line with Roy Hill's recent process improvements.</b>   | Comprehensive review undertaken and required amendments to documents identified.  |
| <b>Conduct a modern slavery risk hot spotting exercise to identify Roy Hill's most salient Modern Slavery risks</b>          | Risk hot spotting exercise completed and identified high risk areas/products in Roy Hill's supply chain.  |
| <b>Imbed Modern Slavery Portal into business processes</b>   | Modern Slavery Procedure updated to include the requirement of 'at-risk' suppliers to undergo further screening through the Modern Slavery Procedure. |
| <b>Roll out Modern Slavery training to those in roles which may interface with the issue of Modern Slavery</b>               | Relevant key functions received modern slavery training.  |
| <b>Further expand Roy Hill's networks in relation to Modern Slavery to enable further collaboration</b>                      | Joined the Human Rights Resources and Energy Collaborative (HRREC) and continued engagement with Mineral Council of Australia.                        |
| <b>Strengthen the accessibility, inclusivity and communication of Roy Hill's modern slavery grievance reporting channels</b> | Relevant documents updated and communication delivered to business.   |
| <b>Conduct in depth investigation into high-risk areas/products within Roy Hill's supply chain</b>                           | Completed in depth investigations on solar panel supply chains and personal protective equipment (PPE) supply chains.                                 |

Roy Hill has and will continuously improve its approach and management of modern slavery risks and report against the planned activities and metrics outlined above. The Modern Slavery Specification requires action to be taken in the following areas and Roy Hill will measure progress in line with the following:

- accountabilities
- the approach to operations and supply chain risk assessment and due diligence
- on-boarding and contracting requirements
- the auditing and compliance approach
- training proposals
- confidential internal reporting and annual external modern slavery reporting
- the approach to remediation of any issues arising.



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## 6. Consultation with subsidiaries / any entity owned or controlled

Roy Hill operates as an integrated group. Policies, processes and systems are all prepared for the Roy Hill Group and applied to the Roy Hill Group consistently. Teams across all parts of the Roy Hill business have been consulted and have had input into this statement (and the formulation of the Roy Hill Group approach to Modern Slavery risks).



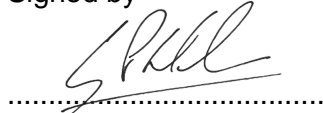
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## 7. Any Other Business

There is nothing additional to note for this reporting period.  
This Statement has been approved by the Boards of the Roy Hill Group.

Signed by



.....  
Gregory P Hawkins, Company Secretary

Date:

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