

**WESTERN AREAS LTD**



**MODERN SLAVERY STATEMENT**  
**Financial Year 2021**



## INTRODUCTION

Western Areas Limited's ("Western Areas", "WSA" or "Company") Modern Slavery Statement outlines the approach to recognising and managing the threat of modern slavery to the Company's operations and supply chain. Western Areas is committed to developing and implementing policies and procedures that will recognise and combat the potential threat of modern slavery within its sphere of influence.

Modern slavery is used to describe a range of exploitative practices including human trafficking, slavery, forced labour and child labour. Western Areas strongly opposes any form of modern slavery within the organisation and its supply chain.

## OUR OPERATIONS

Western Areas is an Australian-based mining and exploration company that aims to be a sustainable and profitable, nickel-focused, base metal miner. It has a portfolio of operational and emerging nickel mines with targeted production of over 15,000 tonnes per annum of nickel in concentrate, for in excess of 10 years.

The Company has been listed on the Australian Securities Exchange (ASX) under the ticker code "WSA" since July 2000 and is a member of the ASX 300. The Company owns a 100% interest in both the Forrestania Nickel Operation ("Forrestania") and the Cosmos Nickel Operation ("Cosmos"), which are both located in Western Australia.

The Company's primary nickel producing asset is at Forrestania, located 400km east of Perth in Western Australia. At Forrestania, two high grade, low costs, underground mines, Flying Fox and Spotted Quoll, produced approximately 16,000 to 20,000 nickel tonnes per annum. The nickel ore mined is processed through the Cosmic Boy Concentrator (CBC) and nickel concentrate is presently sold into offtake agreements with BHP Billiton for a minimum 10,000tpa nickel and the balance to the Jinchuan Group, China's largest nickel cathode producer.

Western Areas' primary growth asset is the long-life Odysseus mine, located at Cosmos. Both surface infrastructure and underground preproduction mine development activities are well advanced with the operation scheduled to commence nickel concentrate production during FY23. The Odysseus mine will utilise an innovative and efficient shaft haulage system for ore and waste removal that enables this project to operate at a low all-in sustaining cost.

The Company continues to cultivate new, EV battery-linked, customers that purchase a value added, premium grade nickel sulphide precipitate (NSP) product that is produced by the Company's Mill Recovery Enhancement Plant (MREP) located at Forrestania.

The Company is an active base metal explorer at both the Cosmos and Forrestania projects, while also boasting a significant landholding in the emerging Western Gawler region in South Australia. The Company has a JV agreement at Mt Alexander with St George Mining and Farm-in agreements with Iluka in the Fowler Domain and Metal Hawk across the Eastern Goldfields and within the Albany-Fraser province.

## GOVERNANCE

The Western Areas Board of Directors' has established a publicly-available, confidential whistle-blower service. As one element of a broad spectrum, this service provides the opportunity for suspected breaches of the Modern Slavery Act or human rights abuses to be reported. No reports have been received, in 2021 or ever, related to modern slavery or human rights violations. Should a report be received in the future, a full and thorough investigation will be completed in line with the Company's clearly articulated procedures.



Western Areas Limited		
<b>Forrestania Nickel Operation (100%)</b> Flying Fox Spotted Quoll	<b>Cosmos Nickel Operation (100%)</b> Odysseus Mine AM6 Deposit	<b>BioHeap (100%)</b> Bacterial Heap Leach Worldwide Patents Full Laboratory
<b>Forrestania (100%)</b> Lounge Lizard – Ni Diggers South – Ni New Morning – Ni Cosmic Boy - Ni	<b>Cosmos (100%)</b> AM5 Deposit - Ni Mt Goode– Ni	<b>Australia Exploration</b> Mt Alexander JV – Ni Iluka JV - Western Gawler – Ni, Cu, Au Metal Hawk JV – Ni, Cu
<b>Panoramic Resources LTD (WSA 19.9%)</b> Savannah Nickel Project – Ni	<b>Grid Metals Corp (WSA 5.5%)</b> Makwa – Ni, PGM Mayville – Ni, PGM East Bull Lake – Ni, PGM	<b>Metal Hawk Ltd (WSA 5%)</b> Emu Lake – Au, Ni Kanowna East – Au, Ni Fraser South – Ni, Cu





## OUR APPROACH TO MODERN SLAVERY

WSA is committed to upholding the Human Rights of all stakeholders we engage within our business. We strive to recognise and respect the rights and dignity of all people and to uphold ethical practices within our workplaces and supply chains. WSA values leading by example, acting with integrity and fostering an ethical culture where everyone embraces a sense of personal responsibility for doing the right thing in the right way. Respecting human rights across all our business activities helps to uphold our core values, which underpin our vision of creating long term, sustainable value for all our stakeholders. Our underlying values and guiding principles are detailed in the Company's Code of Conduct and Human Rights Policy documents.

WSA's management of Modern Slavery is captured within the Company's broader view of environmental, societal and governance risks. This wide-reaching and comprehensive approach to risk management is used to take a risk-based approach to managing modern slavery within the supply chain and operations. WSA operates a company-wide Risk Management Program (RMP) and the risk of modern slavery is assessed and managed in line with the principles and standards contained in the RMP.

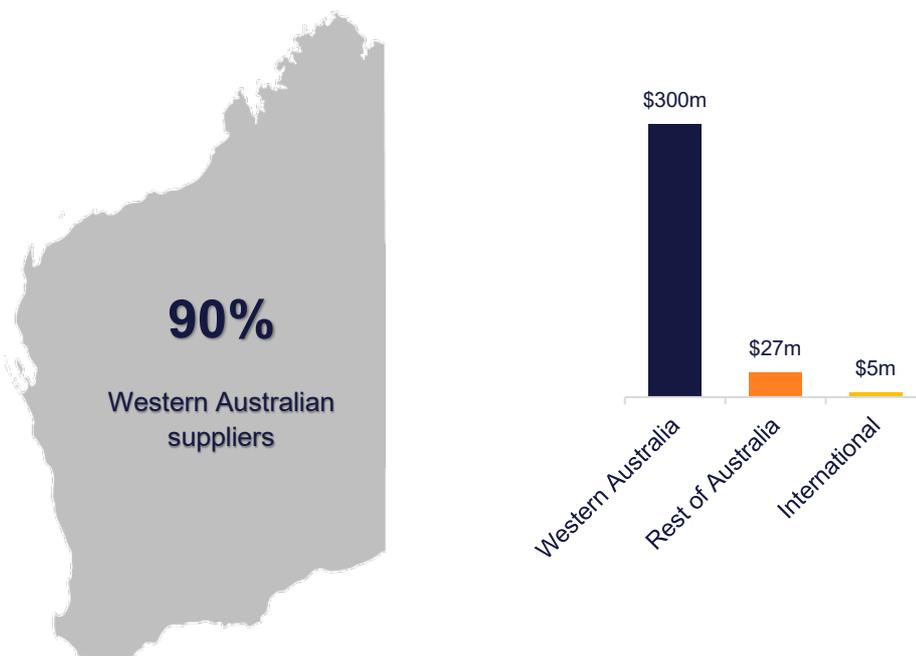
WSA understands that human rights due diligence is an ongoing process, which is embedded in the risk and procurement processes of our business. As such, we have put in place appropriate systems and controls to identify and assess our human rights risks, and integrate those findings to manage them effectively. There is an ongoing process to update and refine the systems and controls within our business.

We currently assess our effectiveness in identifying and managing modern slavery and human rights risks by undertaking regular reviews of our policies and procedures, monitoring and tracking our actions and outcomes, and engaging with suppliers.

## WESTERN AREAS SUPPLY CHAIN

Although the Australian mining industry is considered a low risk for modern slavery, WSA is committed to running modern slavery-free operations and supply chains. Through contractual arrangements and procurement policies, consultants, agents, contractors and suppliers are required to comply with the WSA Code of Conduct. The Company's standard terms and conditions also require that minimum standards in environmental, ethical and health & safety measures are met. Underlying mechanisms are in place to support compliance with the code of conduct and assurance that relevant controls are being correctly applied.

At Western Areas we try to prioritise our procurement from local suppliers where we can. During FY21, over 98% of the goods and services were procured from Australian suppliers, with 90% from Western Australian suppliers.





Our primary spend categories are:

- Underground mining contractor services
- Energy and Fuel
- Explosives and Chemicals
- General industrial equipment and consumables
- Engineering and Project Management Services
- Camp management services
- Freight and logistics services

## FY21 ACTIONS

During FY21, WSA continued to improve our Modern Slavery awareness and education throughout the company.

### Policies & Procedures

During the year, the WSA Code of Conduct, standard contractual and general purchase order terms and conditions were comprehensively reviewed and updated to ensure all employees, contractors and suppliers comply with our minimum standards relating to human rights and modern slavery.

### Training and Awareness

WSA has continued to develop our approach to awareness and training amongst our workforce and stakeholders. Our key procurement and commercial personnel have completed the Anti-Slavery Australia training course, conducted by the Faculty of Law at the University of Technology Sydney. This course is focused on helping build skills to identify, assess and manage the risk of potential modern slavery practices in our supply chain.

### Risk Management

As part of the RMP, we annually reviewed our modern slavery risks on our risk register, and ensured control management activities were assigned to ensure performance was appropriately measured and monitored.

### Reports

During the year, WSA did not receive any whistleblower reports or other complaints relating to modern slavery or human rights abuses. If a report is received in relation to a supplier or contractor, we will work closely with them to investigate the allegation made and where substantiated, we will assist them to fully, appropriately and quickly resolve the issues.

## LOOKING FORWARD

WSA recognises the value of continual improvement and the importance of assessing the effectiveness of the actions taken to address modern slavery risks.

WSA is committed to ongoing improvement with respect to its influence on Human Rights and Modern Slavery by:

- Continuing to expand our education and training program to our employees on the aspects of modern slavery and the importance of preventing modern slavery.
- Reviewing and refining internal controls to improve the Company's prevention and mitigation of potential modern slavery risks.
- Develop a supplier survey to further assess our supply chain and the risks of modern slavery in their businesses.
- Continue to monitor and assess the Company's activities to provide assurance that Company policies and procedures are being effectively executed.



## APPROVAL

The Board members of Western Areas Limited (ACN 091 049 357), and of its relevant operating subsidiaries Australian Nickel Investments Pty Ltd (ACN 111 599 323) and BioHeap Limited (ACN 009 225 398), have authorised and approved the publication of this Statement.

A handwritten signature in black ink that reads "DR Lougher".

**Daniel Lougher**

Chief Executive Officer and Managing Director  
Western Areas Limited