



MINERAL RESOURCES LIMITED  
**2025 MODERN SLAVERY  
STATEMENT**



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## ACKNOWLEDGEMENT OF COUNTRY

MinRes is committed to reconciliation and recognises and respects the significance of Aboriginal and Torres Strait Islander Peoples' communities, cultures and histories.

We acknowledge Aboriginal and Torres Strait Islander People as the first and continuing custodians of the land and waters, and in doing so pay respect to Elders past and present. We extend this acknowledgement and respect to indigenous people and communities globally.

MinRes is proud to work on Aboriginal Country alongside Traditional Owners. We remain dedicated to listening, learning and working together with Aboriginal People to build a future for generations to come.

## ABOUT THIS STATEMENT

Mineral Resources Limited (MinRes) issues this joint Modern Slavery Statement (Statement) on behalf of MinRes and all reporting entities set out in our consolidated entity disclosure statement in the **FY25 Full Year Statutory Accounts**, in accordance with section 16 of the *Australian Modern Slavery Act 2018* (Cth) (the Act), for the financial year ending 30 June 2025.

All references to 'MinRes', 'the Company', 'the Group', 'we', 'us' and 'our' refer to Mineral Resources Limited (ABN 33 118 549 910), located at 20 Walters Drive, Osborne Park WA 6017 and its controlled entities.

All dollar figures are expressed in Australian dollars (AUD) unless otherwise stated. Figures may be rounded (text to one decimal place, tables to the nearest thousand), which may cause minor discrepancies between totals and component sums.

This Statement adopts the definition of modern slavery as defined in the Act, which refers to situations where a person's freedom has been restricted or removed so that they can be exploited. This may include human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, worst forms of child labour<sup>1</sup> and deceptive recruiting for labour or services.

This Statement forms part of our full annual reporting suite. For a complete overview of our sustainability performance, please visit our **website**.

## REPORTING BOUNDARIES

This Statement covers functions and assets that generate significant sustainability impacts (actual and potential) and/or all entities where MinRes exercises operational control through the implementation of operational, health and safety, and environmental policies. This includes exploration activity, projects in development or execution phases, sites and operations under care and maintenance that are wholly owned and/or operated by MinRes or that are owned as a joint venture operated by MinRes (referred to as 'operations' or 'assets'). This includes assets that are non-wholly owned subsidiaries.

MinRes also holds interests in assets that are owned as a joint venture but not operated by MinRes (referred to as 'non-operated joint ventures'). Non-operated joint ventures are not included in MinRes' reporting and, as a result, statements regarding our operations, assets and values apply only to our operated assets unless stated otherwise.

MinRes welcomes feedback regarding this Statement. Please direct your enquiries to **investorrelations@mrl.com.au**.

## APPROVAL

This Statement was approved by the Board of Directors in its capacity as the principal governing body of the parent entity MinRes on 30 September 2025.



Malcolm Bunday  
**Independent Non-Executive Chair (responsible member)**

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<sup>1</sup> Worst forms of child labour defined in International Labour Organisation Convention No. 182 and Recommendation 190.

## A MESSAGE FROM OUR **INDEPENDENT NON-EXECUTIVE CHAIR**



**MinRes recognises the persistent challenges surrounding human rights and modern slavery and remains steadfast in its commitment to uphold these rights throughout our operations, partnerships and supply chain.**

In a period marked by geopolitical instability, economic pressures and environmental challenges, MinRes remains firmly committed to identifying, preventing and addressing the risks of modern slavery across our business.

We acknowledge that our industry and extensive global supplier network present inherent human rights risks, and we are not immune to them despite our Australian base. Our focus remains on strong governance, robust due diligence and open engagement with suppliers to uphold our human rights standards.

In FY25, we updated our *Supply Chain Human Rights Incident Management Procedure* to enhance our alignment to the MinRes risk management framework, specifically the remediation and treatment of human rights risk exposures within our supply.

To demonstrate our commitment, we continued to engage an independent auditor to carry out our first on-premises social audit as part of our social compliance audits in accordance with our Supply Chain Transparency Framework and Program. This enables us to assess how our suppliers manage human rights exposures within their own operations and supply chain, proactively identifying compliance and areas for improvement.

With over 3,500 suppliers across 28 countries, we recognise our greatest exposure lies within our supply chain. We aim to build on our audit program, working closely with selected suppliers to support compliance and remediation through our risk-based framework in FY26 and beyond.

### **KEY ACHIEVEMENTS**

- Continued to roll out our human rights training across key business units.
- Completed four social compliance audits, including suppliers with international locations and Tier 2 suppliers.
- Two social audit corrective action plans were closed out with the remaining corrective action plan issued with actions tracking to plan. Refer to *Social Compliance Audits*.
- Updated the *Supply Chain Human Rights Incident Management Procedure* to ensure the risk treatment and remediation pathways aligned to the MinRes risk management frameworks and procedures.
- Continued to leverage our existing product-based risk assessments in determining our exposure to human rights-related risks in key supply chains, beyond our Tier 1.



Malcolm Bunday

**Independent Non-Executive Chair**



## OUR STRUCTURE, OPERATIONS AND **SUPPLY CHAIN**

MinRes is a diversified Australian mining and mining services company, listed on the Australian Securities Exchange (ASX: MIN). Operating under a fully integrated business model, MinRes is structured around five core business pillars: Mining Services, Engineering and Construction, Iron Ore, Lithium, and Energy (Figure 1).

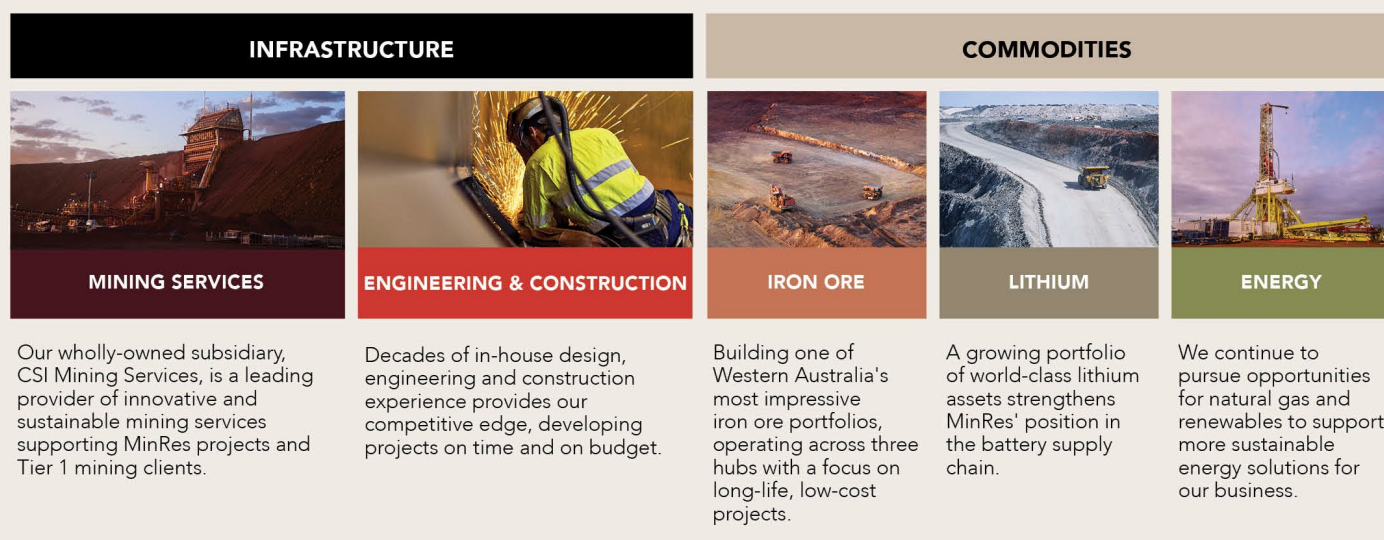


Figure 1: MinRes organisational structure

As the parent entity of the MinRes Group, the company oversees a number of subsidiary entities that support the group's operations. A full list of these entities is provided in our consolidated entity disclosure statement in the **FY25 Full Year Statutory Accounts**.

These entities support the Group's operational activities, operating under the same policies and procedures established by MinRes and sharing many of the same suppliers. Accordingly, this Statement provides a consolidated account of the actions undertaken to address modern slavery risks.

Among these entities, 13 reported annual consolidated revenue of at least \$100 million in FY25 and are therefore required to comply with the Act (Figure 2).

MINERAL RESOURCES LIMITED						
CRUSHING SERVICES INTERNATIONAL PTY LTD ABN: 88 069 303 377	PROCESS MINERALS INTERNATIONAL PTY LTD ABN: 49 063 988 894	POLARIS METALS PTY LTD ABN: 18 085 223 570	MT MARION HOLDINGS PTY LTD ABN: 69 666 115 742	MRL ASSET MANAGEMENT PTY LTD ABN: 74 169 725 964	WONMUNNA IRON ORE PTY LTD ABN: 14 169 151 777	MINRES MARINE PTY LTD ABN: 84 638 643 919
100%	100%	100%	100%	100%	100%	100%
WODGINA LITHIUM PTY LTD ABN: 62 611 488 932	ONSLow IRON PTY LTD ABN: 24 649 012 395	MINERAL RESOURCES TRANSPORT PTY LTD ABN: 19 158 718 195	YILGARN IRON PTY LTD ABN: 16 626 035 078	MT MARION LITHIUM MANAGEMENT PTY LTD ABN: 25 666 116 365	ONSLow IRON ROAD PTY LTD ABN: 23 677 161 527	
100%	100%	100%	100%	100%	51%	

Figure 2: Consolidated entities with at least \$100 million in revenue in FY25

During the year, Yilgarn Iron Pty Ltd was disposed by the Group (full divestment and loss of control effective 27 June 2025).

The Group also has interests in joint operations for which the Group has recognised its share of jointly held assets, liabilities, revenue and expenses. Significant joint operations include the Red Hill Iron Ore Joint Venture (57 per cent),<sup>2</sup> Mt Marion Lithium Pty Ltd (50 per cent) and MARBL Joint Venture (50 per cent). The Group's direct ownership interest in these joint operations (reflected in brackets above) has not changed during the year ended 30 June 2025.

MinRes and its subsidiaries offer the full suite of pit-to-port mining and mining logistics services, encompassing support facilities like workshops, a distribution centre and our corporate head office, to mineral and gas exploration and operating and servicing our own large-scale commodity projects.

MinRes' subsidiaries support our mining services and commodities businesses by undertaking the following activities, refer to Figure 3 for our complete value chain.



Figure 3: Our value chain

## OUR SITES AND OPERATIONS

MinRes' operations are predominately located within Western Australia, with mining services contracts servicing clients in the Northern Territory and Queensland. MinRes exports its products through the ports of Port Hedland, Esperance and Ashburton, the latter forming part of MinRes' new Onslow Iron project (Figure 4). All lithium spodumene concentrate and iron ore produced is exported to China.

<sup>2</sup> The Group has an additional 3.3 per cent indirect interest in the Red Hill Iron Ore Joint Venture via its 15 per cent interest in Aquila Resources Pty Ltd.

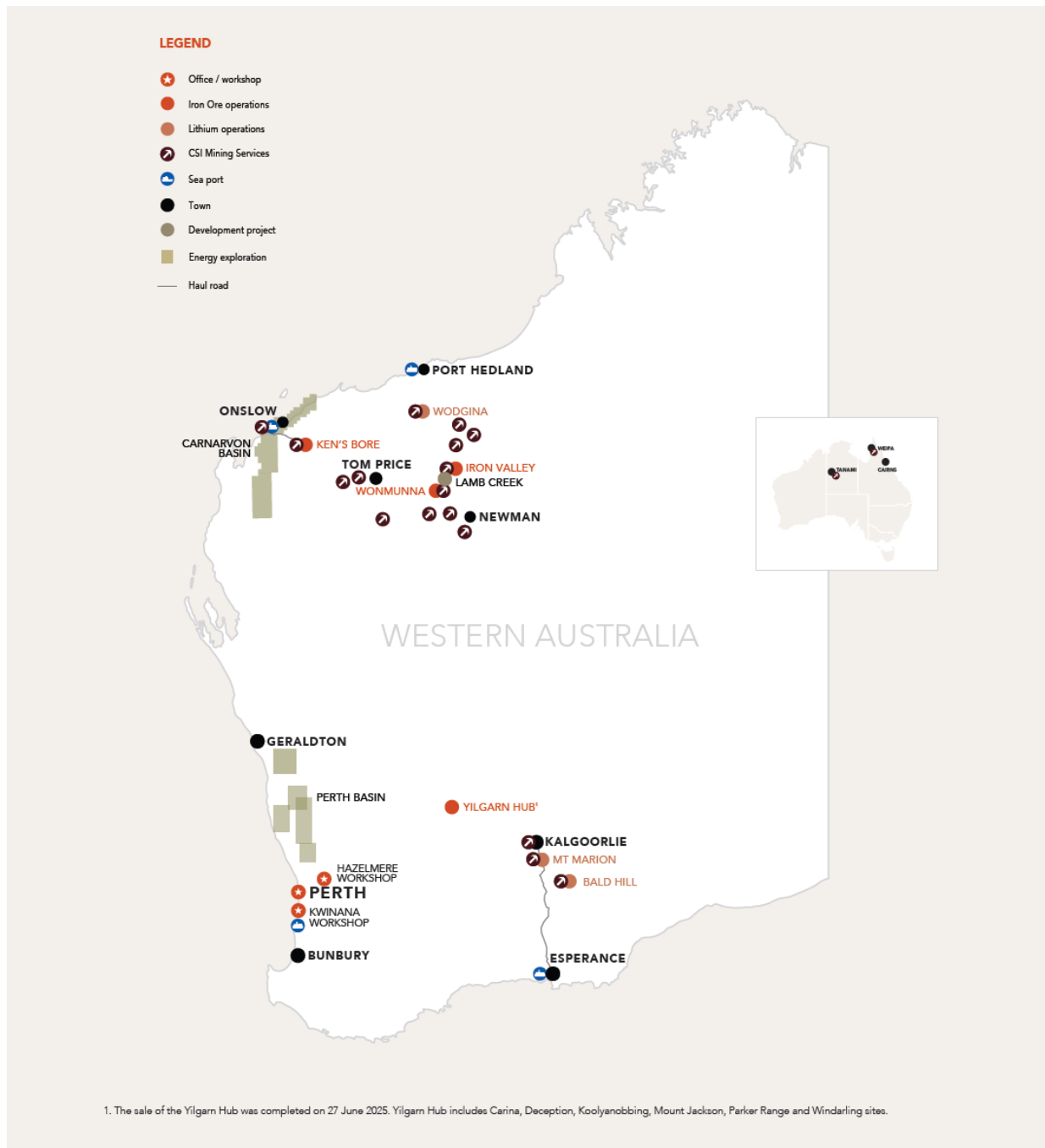


Figure 4: MinRes operations

## OUR WORKFORCE

As at 30 June 2025, MinRes' workforce<sup>3</sup> consisted of 6,798 employees, representing a decrease of 20 per cent compared to FY24. This reduction was primarily due to the closure of our Bald Hill Lithium project and Yilgarn iron ore operations, alongside the impact of falling commodity prices. In addition to our employee workforce, we engage contractors to support development projects, as well as activities across our corporate head office, workshops and active regional operations.

<sup>3</sup> This figure does not include contractors or Non-Executive Directors.

We recognise the importance of creating and maintaining a diverse, inclusive and non-discriminatory workplace that values diversity of thought and experience, and we acknowledge the challenges faced by female employees and marginalised groups, including indigenous communities, in attaining secure and equitable working conditions. In FY25, we continued to prioritise diversity and inclusion initiatives, with particular focus on bridging the gap in participation rates of those who identify as female and Aboriginal and Torres Strait Islander. Across our workforce, 22.1 per cent of our workforce identify as female, non-binary or prefer not to disclose, and 3.6 per cent identify as Aboriginal and Torres Strait Islander.

Our employees are covered by a variety of industrial mechanisms including collective bargaining agreements (33 per cent), modern awards (39 per cent) and individual employment contracts in accordance with Australian employment law standards. Refer to Figure 5 for key breakdown in workforce statistics.

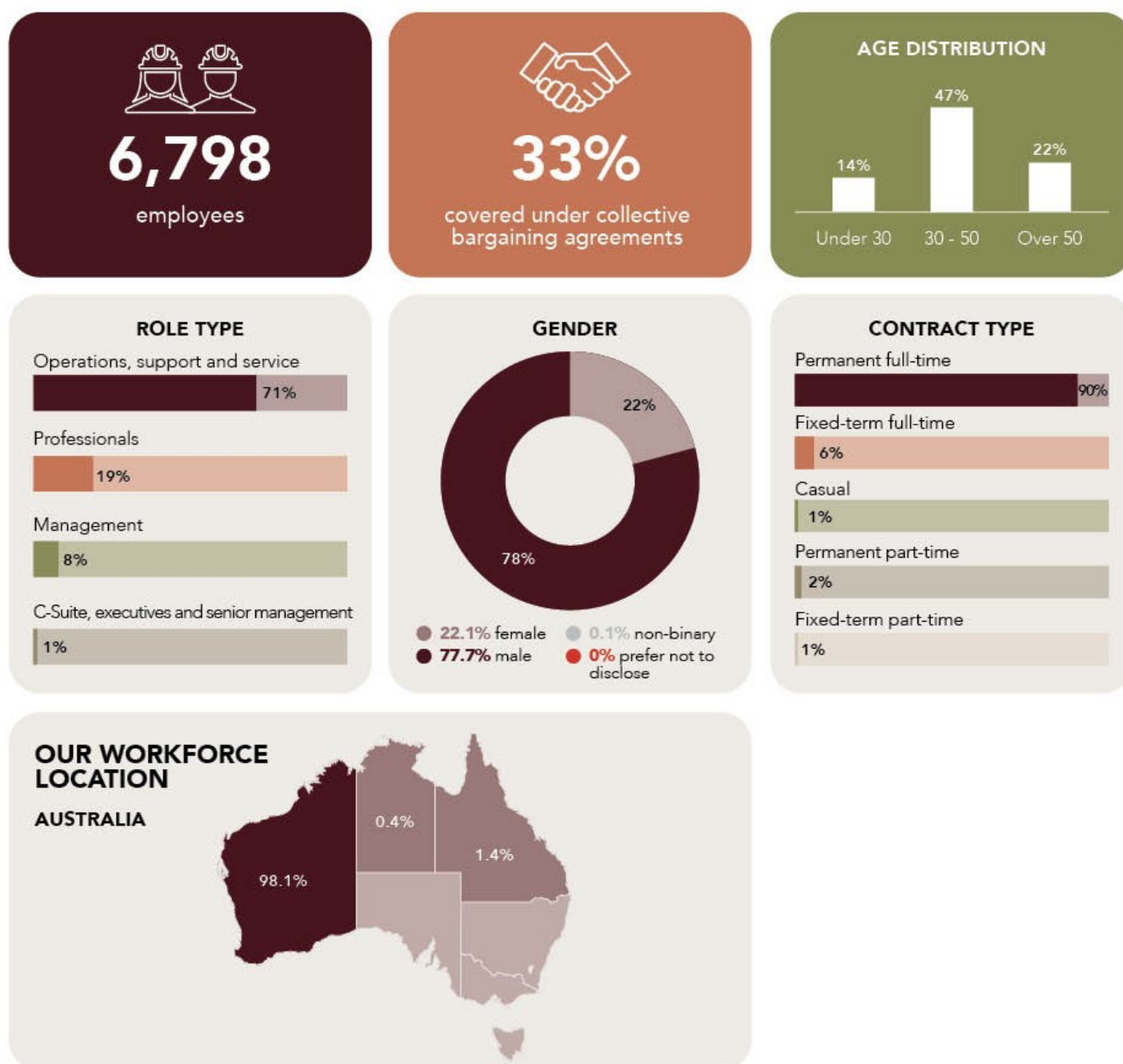


Figure 5: Our workforce

Refer to our **2025 Sustainability Report** and **Sustainability Performance Data Tables** for more details on our workforce statistics and year-on-year comparisons.



## OUR SUPPLY CHAIN

Our Supply function is accountable for sourcing goods and services in a manner that delivers value to the business, while complying with established standards and procedures through our risk screening program. We expect our suppliers to partner with MinRes in a shared commitment to the highest levels of safety, consideration for communities, heritage and the environment and the protection of human rights including a zero-tolerance approach to modern slavery. This commitment is driven by our Sustainable Procurement team, working closing with Strategic Procurement, Procurement Services, Supplier Management and Inventory functions to ensure a coordinated approach.

MinRes prioritises sourcing from local suppliers to strengthen the communities in which we operate, promote transparency and enduring relationships and build a resilient supply chain. Our approach also includes engaging business partners that actively encourage, support and employ local Aboriginal People through tailored commercial opportunities.

We continue to invest in initiatives that build local capability, identifying programs and support mechanisms to help Aboriginal businesses and individuals achieve their business aspirations. We look to our suppliers to actively contribute by prioritising employment opportunities.

Detail on these initiatives can be found in our **2025 Sustainability Report**.

## SUPPLIER SPEND

In FY25, MinRes spent \$4.4 billion<sup>4</sup> on goods and services to support our workshops, mining operations and corporate offices. This expenditure was allocated across a network of 3,530 active Tier 1 suppliers across 28 countries.

Of the suppliers we contracted directly, 84 per cent of our total spend occurred in Australia, with 81 per cent of that Australian spend concentrated in Western Australia. In FY25, procurement from Aboriginal businesses totalled \$73.5 million, reflecting a 8 per cent increase compared with FY24.

## GOODS AND SERVICES PROCURED

MinRes procures goods and services from our Tier 1 suppliers across a range of key categories, as shown in Figure 6.

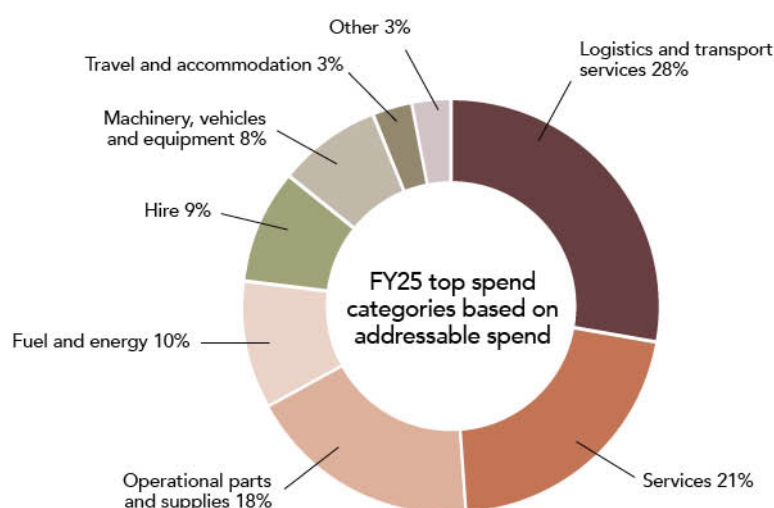


Figure 6: Top spend categories based on addressable spend

<sup>4</sup> Excludes acquisition and internal labour costs, as well as government costs or charges (including royalties), donations, subscriptions and memberships, Native Title Group payments (other than payments made for the provision of direct goods and services), property leasing, related MinRes entities and legal fees. As a result, these figures will vary from the Annual Report's financial statements and are not intended to demonstrate the proportional allocation of spend or costs for entities not wholly owned by MinRes.

## LOCATION OF OUR SUPPLIERS

We aim to work with suppliers from the regions in which we operate. In FY25, 93 per cent of our contracted Tier 1 suppliers were located in Australia, with 74 per cent of these based in Western Australia.

We recognise that some Tier 1 Australian suppliers may source raw materials and components through supply chains that extend internationally, as outlined in Our Supply Chain Beyond Tier 1.

Most of our international suppliers are located across China, Singapore, United States, United Kingdom and Canada (Table 1).

*Table 1: Top 10 countries based on percentage of suppliers and their industries by largest spend*

COUNTRY	TOP INDUSTRY
Australia	<ul style="list-style-type: none"> <li>• Dry bulk haulage</li> <li>• Fuels</li> <li>• Machinery/vehicle components and parts</li> </ul>
China	<ul style="list-style-type: none"> <li>• Marine equipment</li> <li>• International freight</li> <li>• Mineral processing equipment components</li> </ul>
Singapore	<ul style="list-style-type: none"> <li>• International freight</li> <li>• Machinery, vehicles and equipment maintenance</li> <li>• Marine equipment</li> </ul>
Japan	<ul style="list-style-type: none"> <li>• International freight</li> <li>• Marine equipment</li> <li>• Raw materials</li> </ul>
Canada	<ul style="list-style-type: none"> <li>• Engineering services</li> <li>• International freight</li> <li>• Material handling equipment components</li> </ul>
Hong Kong	<ul style="list-style-type: none"> <li>• International freight</li> <li>• Technology and communications services</li> <li>• Raw materials</li> </ul>
Denmark	<ul style="list-style-type: none"> <li>• International freight</li> <li>• Technology and communications services</li> </ul>
United States	<ul style="list-style-type: none"> <li>• Technology and communications services</li> <li>• Machinery/equipment hire</li> <li>• Other services</li> </ul>
United Kingdom	<ul style="list-style-type: none"> <li>• International freight</li> <li>• Technology and communication services</li> <li>• Professional services</li> </ul>
United Arab Emirates	<ul style="list-style-type: none"> <li>• Professional services</li> <li>• Technology and communication services</li> <li>• Accommodation</li> </ul>



## IDENTIFYING RISKS OF MODERN SLAVERY

Modern slavery is a global issue, present in every country and capable of taking many forms across both operations and supply chains. These risks can be complex and difficult to detect, often influenced by the social, political and economic conditions of the region in which goods and services are produced and provided.

We acknowledge that these risks are dynamic and may shift over time. As such, we remain committed to proactively identifying, assessing and addressing potential instances of modern slavery within our operations and supply networks. Our strategy is guided by the *United Nations Guiding Principles on Business and Human Rights*, ensuring we carefully consider the ways in which our practices and those of our reporting entities could cause, contribute to, or be directly connected with modern slavery across the value chain. See Figure 7 for further details.

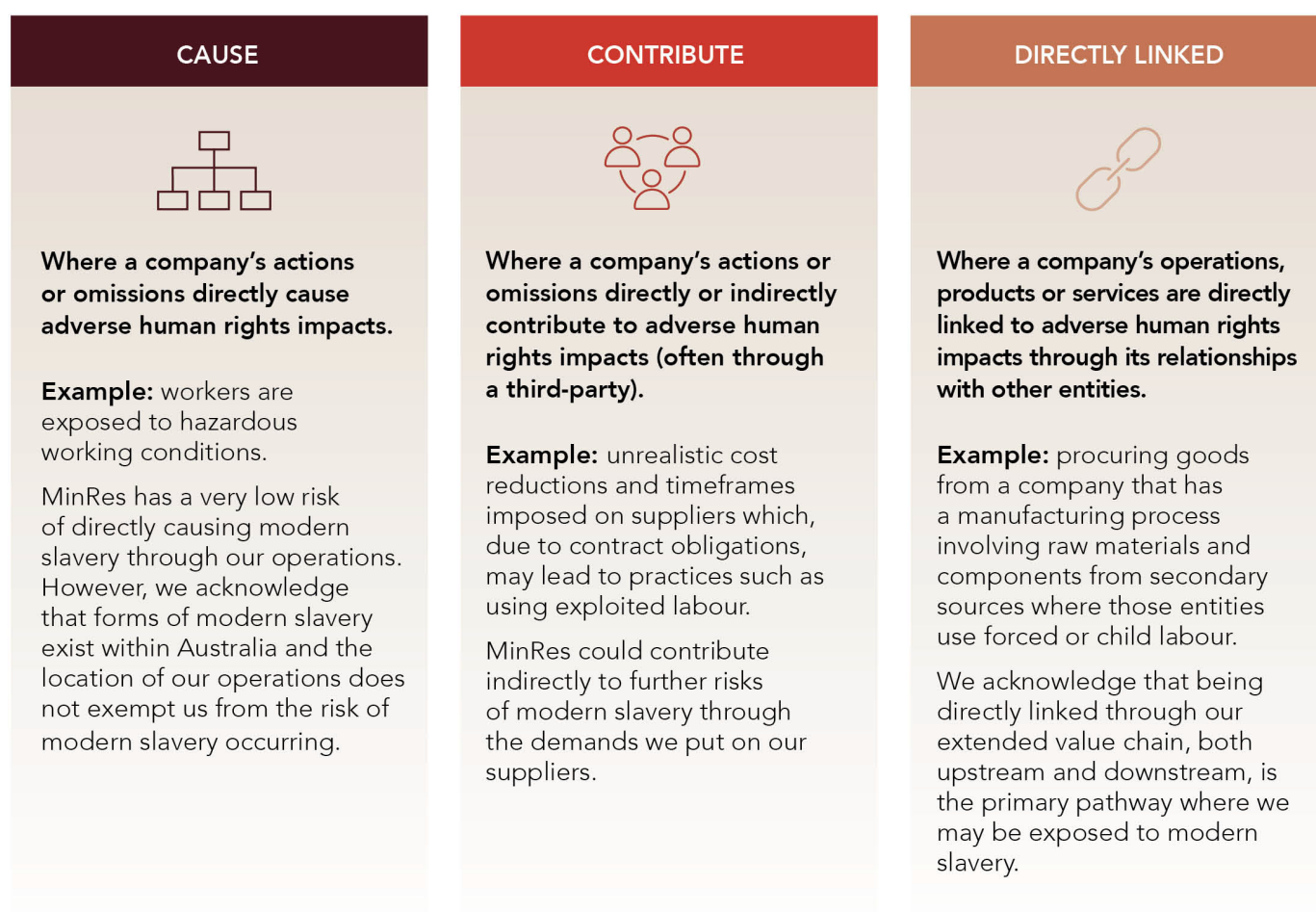


Figure 7: Potential for MinRes to cause, contribute to, or be directly linked to, modern slavery

## OUR OPERATIONAL RISKS

In FY25, all of MinRes activities were based in Australia, which the Global Slavery Index<sup>5</sup> identifies as having both a low prevalence of, and vulnerability to, modern slavery. This, combined with our structured recruitment processes, substantial use of in-house employees across core services including higher risk areas such as health and fitness, daycare and creche, catering and cleaning, security, and operation of charter flights (covering both flight attendants and ground crew) significantly reduces the likelihood of our direct involvement in modern slavery practices.

Nevertheless, we remain alert to potential exposure in subcontracted labour and outsourced services often linked to the presence of vulnerable worker groups, including migrant workers and individuals engaged in low-skilled or unskilled roles. These workers may face increased susceptibility to exploitative practices due to factors such as language barriers, limited awareness of workplace rights, or dependence on third-party labour hire providers.

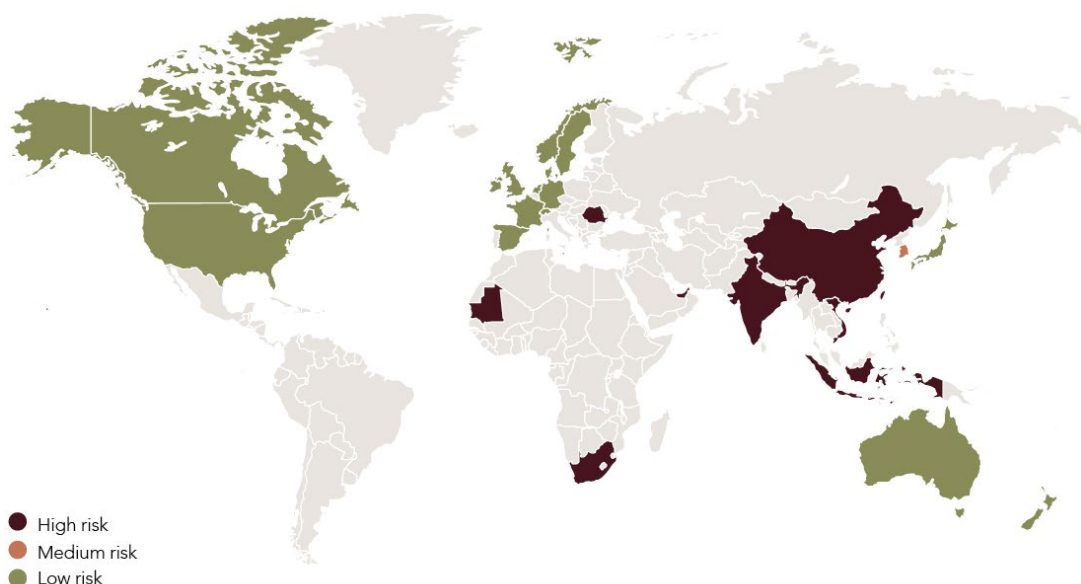
Specific areas of risk include the use of labour hire and short-term contract workers, particularly during shutdowns and in construction.

MinRes works in close partnership with contractors and reputable, pre-vetted external recruitment agencies to ensure full compliance with our *Code of Conduct and Business Integrity (Code of Conduct)* and adherence to all applicable Australian laws and regulations. This includes rigorous contractor prequalification processes, such as verification of employment conditions, right-to-work checks and compliance with the *Fair Work Act 2009 (Cth)*. This collaborative and proactive approach is essential to maintaining high operational, ethical and safety standards across all areas of our business.

## OUR SUPPLY CHAIN RISKS

We continue to review our supply chain risks to ensure our assessment, mitigation and monitoring activities remain focused on the areas of greatest exposure. Key vulnerabilities exist within our supply chain, particularly in the procurement of goods, materials and equipment from international suppliers in jurisdictions with higher rates of labour exploitation.

During FY25, over 92 per cent of our total spend was allocated to suppliers in low-risk countries, with less than 8 per cent of spend allocated to high-risk countries. With our high-risk spend, 92 per cent is concentrated in three key regions, China, Hong Kong and Malta (Figure 8).




<sup>5</sup> Walk Free Foundation. 2023. Global Slavery Index. <http://www.globalslaveryindex.org/>.



Figure 8: Our Tier 1 supply chain risk

Our Tier 1 supply chain analysis has identified and assessed several high-risk industries as outlined in Table 2.

Table 2: High-risk criteria for modern slavery within our supply chain and mitigating factors

HIGH-RISK INDUSTRY	RISK IDENTIFICATION AND ASSESSMENT
 <p><b>Sourcing of electrical goods and renewable energy technology*</b></p>	<p>Many electrical components require minerals such as tungsten, tin, coltan, copper, polysilicon and gold in their production, which may be sourced from conflict-affected and high-risk areas.</p> <p>The manufacture of electronic goods and renewable energy technology often occurs in high-risk geographies, where regulation is limited and labour is cheap, which makes workers more vulnerable to modern slavery practices.</p> <p>At MinRes, we source a variety of electronic goods, from computers and mobile devices to site-based transformers and renewable energy technologies. We recognise that in an increasingly decarbonised world, the rapid shift towards renewable energy technologies may increase the potential of modern slavery practices.</p> <p>Potential risks include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• forced labour</li> <li>• debt bondage</li> <li>• conflict mineral sourcing.<sup>6</sup></li> </ul> <p>MinRes continues to monitor any requirements to undertake enhanced due diligence associated with the sourcing of particular goods or materials. We carry out appropriate due diligence and supply chain analyses for the sourcing of renewable technologies to identify and assess any high-risk supply chains.</p>
 <p><b>Sourcing of safety supplies and garments*</b></p>	<p>Safety supplies, in particular personal protective equipment and other clothing, carry a higher risk of modern slavery due to the employment practices and conditions in the country of manufacture and known risks associated with raw materials, particularly cotton.</p> <p>Potential risks include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• excessive working hours</li> <li>• underpayment and non-payment of wages</li> </ul>

<sup>6</sup> Informed 365. Modern slavery exposed in big tech supply chains. <https://informed365.com/modern-slavery-exposed-in-big-tech-supply-chains/>

## HIGH-RISK INDUSTRY

## RISK IDENTIFICATION AND ASSESSMENT

- unsafe working conditions.<sup>7</sup>

MinRes has previously completed a social audit with one of our providers and will continue to monitor our risk exposure to inform future actions.



### **Outsourced manufacturing and fabrication\***

Outsourcing of equipment, parts, fabricated components and raw materials from suppliers in jurisdictions with a higher prevalence of labour exploitation.

Potential risks include, but are not limited to:

- forced labour
- debt bondage
- child labour
- inadequate accommodation
- confiscation of identity documents
- human trafficking<sup>8</sup>
- underpayment and non-payment of wages.<sup>9</sup>

Most of the fabrication and maintenance of fixed plant and mobile plant is carried out at our dedicated workshop facilities and undertaken by MinRes employees, who are supported by MinRes' operational recruitment practices and Australian employment laws.

<sup>7</sup> KPMG 2021. Modern slavery in the health services sector: practical responses for managing risk to people. <https://assets.kpmg/content/dam/kpmg/au/pdf/2021/health-services-modern-slavery-practical-guide.pdf>

<sup>8</sup> KPMG 2020. Property, construction and modern slavery: practical response for managing risk to people. <https://assets.kpmg/content/dam/kpmg/au/pdf/2020/property-construction-modern-slavery-practical-guide.pdf>

<sup>9</sup> Australian Council of Superannuation Investors (ACSI) 2019. Modern slavery risks, rights & responsibilities: a guide for companies and investors. <https://assets.kpmg/content/dam/kpmg/au/pdf/2019/modern-slavery-guide-for-companies-investors-feb-2019.pdf>



## HIGH-RISK INDUSTRY

## RISK IDENTIFICATION AND ASSESSMENT



### Sourcing of security services\*

Security services are often associated with workers who may be seasonal or migrant workers sourced under third-party labour hire arrangements.

Potential risks include, but are not limited to:

- forced labour<sup>10</sup>
- human rights abuses.

MinRes provides security personnel across our facilities and operational sites, with staffing split evenly between contractors and MinRes employees.

Contracted private security require a detailed risk assessment and management plan that identified stakeholder capability and where practical mitigate risks in line with **Responsible Production Policy**. These security officers are supplied by a preferred contractor endorsed by MinRes whose values, training and risk mitigation controls are aligned with those of MinRes.

MinRes employed security officers are licenced security officers operating under a MinRes-registered *Security Agents Licence*.

Security personnel are stationed at our corporate head office and across our operational sites to protect our workforce along with company assets. This is a measure recorded in our Psychosocial Hazards Register as a control that mitigates risk for both internal and external stakeholders.

All security officers are required to complete their *Certificate II in Security Operations (CPP20218)* through a registered training organisation approved and endorsed by WA Police and are subject to background checks and regular performance reviews.

In addition, all security officers, including contractors are required to undertake further supplementary training which includes:

- Senior First Aid
- Human Rights Awareness
- Cultural Awareness
- Safe and Respectful Behaviours
- Crowd Control Licence
- Application and understanding of the *Security Act* and Regulations.

All contracted security personnel are also required to operate under contractual clauses that prohibits modern slavery practices, mandate responsible security practises and support MinRes' Safe and Respectful Behaviours Policy.

<sup>10</sup> Walk Free Foundation. 2023. Global Slavery Index. <http://www.globallslaveryindex.org/>

## HIGH-RISK INDUSTRY

## RISK IDENTIFICATION AND ASSESSMENT



### Sourcing of cleaning and catering services\*

Cleaning and catering services are often associated with workers who may be seasonal or migrant workers sourced under third-party labour hire arrangements. This poses a higher risk of modern slavery, with low-skilled, low paid workers more vulnerable to modern slavery practices.

Potential risks include, but are not limited to:

- forced labour
- human trafficking.<sup>11</sup>

Cleaning and catering services provided at MinRes' mine site village accommodation and offices are all insourced services provided by direct-hire MinRes employees.

Periodic internal workforce surveys and direct engagement with employees help identify potential welfare concerns.

In the event additional workers are required for support on a temporary basis, labour hire workers are engaged through the same working arrangements and conditions as MinRes employees.



### Sourcing of shipping and freight services\*\*

The shipping industry is a complex industry with a high risk of modern slavery practices.

The transnational nature of the shipping industry limits the ability for regulatory oversight across international waters to assess and address company practices. Due to the challenging and complex nature of the industry, there are several modern slavery risks that exist including withholding of wages, labour violations and poor living and working conditions.

Potential risks include, but are not limited to:

- forced labour
- debt bondage
- unsuitable working conditions.

MinRes undertakes a due-diligence process on chartered shipping vessel suppliers including an assessment of the ownership and management structure of the counterparties involved.

\* Not-for-retail suppliers, defined as suppliers who provide products such as uniforms or services such as cleaning and/or security.

\*\* Trade suppliers, defined as suppliers who provide products the entity on-sells to customers.

<sup>11</sup> KPMG 2021. Resources, energy and modern slavery: practical response for managing risk to people.  
<https://home.kpmg/au/en/home/insights/2021/12/modern-slavery-risks-practical-guide-resources-energy-sector.html>

## ASSESSING AND ADDRESSING RISKS OF MODERN SLAVERY

MinRes is committed to the ethical management of people, in compliance with all laws, regulations and standards in relation to human rights, employment conditions and equal opportunity.

### KEY CORPORATE GOVERNANCE POLICIES AND PROCEDURES

We embed respect for human rights in several corporate governance policies, procedures and standards, which outline the expectation we have of our employees, contractors and, in some instances, our suppliers, regarding the prevention of modern slavery practices.

In FY25, the Sustainability Committee approved updates to the *Gender Violence Statement*, *Indigenous Peoples Policy* and were briefed on the implementation of the *Supply Chain Human Rights Incident Management Procedure* and the *Human Rights Strategy for Supply*.

### SUPPLY CHAIN HUMAN RIGHTS INCIDENT MANAGEMENT PROCEDURE

The *Supply Chain Human Rights Incident Management Procedure* outlines the possible strategies a selected team can undertake to review any potential incidents of human rights risks in our supply chain, the intent being to work with our suppliers through open communication about the risks, possible remedies and corrective action plans. Importantly, this procedure outlines the escalation process, including the thresholds and criteria for not continuing with a supplier engagement. In FY25 this Procedure was updated to ensure the risk treatment and remediation pathways aligned to the MinRes risk management frameworks and procedures.

Read more about our other policies that contribute to our broader corporate governance framework on our [website](#).

### OUR DUE DILIGENCE ACTIONS

Our supplier engagement model is underpinned by transparency and collaboration. It is an ongoing process that focuses on building awareness and understanding through our due diligence actions. It is these elements that will be able to influence the greatest level of change within our supply chain, refer to Figure 9.

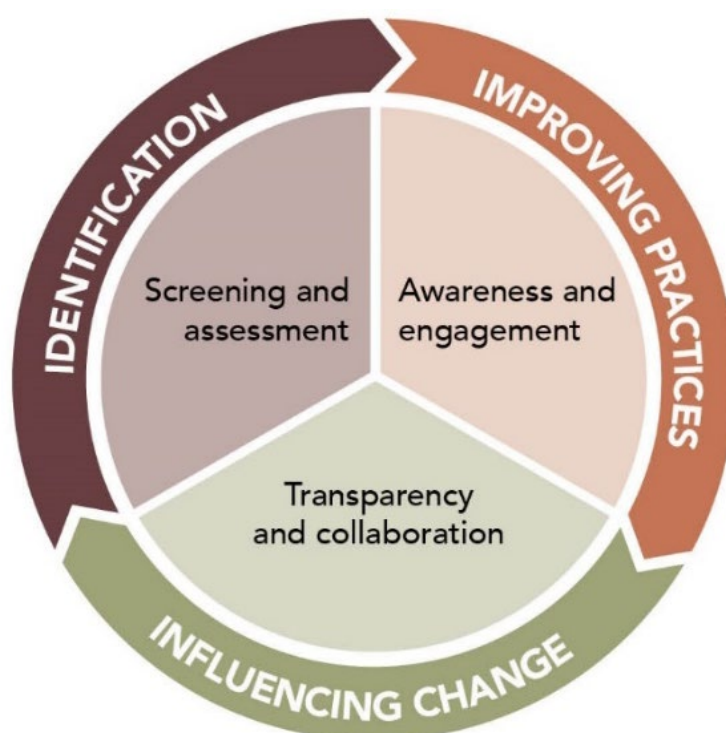


Figure 9: Approach to supply chain actions



## SUPPLIER SCREENING

To understand our potential risk exposure and obligations under the Act, MinRes follows a risk-based approach to identify suppliers with elevated risks of modern slavery and to assess and monitor the risks associated with modern slavery in our business and supply chain.

All new suppliers are screened via our third-party risk assessment software, which assesses the risk of the supplier across modern slavery indicators and other risk factors such as sanctions and anti-bribery and corruption practices. This assessment returns a risk rating based on defined criteria set by MinRes, which is periodically reviewed as we mature in our assessment of risks within our supply chain.

This process builds upon our initial risk assessment as outlined in *Our Supply Chain*, by categorising high-risk countries and improving monitoring of high-risk suppliers to include politically exposed persons (PEPs), sanctions, adverse media and high-risk commodity categories.

Our due diligence processes enable an enhanced level of review across our supply chain and international entities with all suppliers and counterparties screened for modern slavery risks, allowing for the prioritisation of management for the areas considered to be the highest risk in our supply chain.

We have utilised this information to expand our understanding of the potential modern slavery risks that exist within our operations and supply chain and better inform procurement decisions.

## HIGH-RISK SUPPLIERS

### SELF-ASSESSMENT QUESTIONNAIRE (SAQ)

As part of our supplier risk screening and onboarding process, we require all suppliers that represent a potentially high-risk of modern slavery, to complete a SAQ. In some cases, where a supplier has not been initially identified as high-risk, we may still request a SAQ be completed.

The SAQ process assists MinRes to engage and share good practice measures to support suppliers on effective identification of human rights risks within their supply chains, as well as identification of any potential areas for improvement within their own operations. All SAQs are reviewed and managed by our Sustainable Procurement team.

As a result of the supplier screening process, MinRes issued a total of 131 SAQs to suppliers in FY25. Additionally, nine suppliers were sent a SAQ as part of enhanced due diligence pre-screening of high-risk suppliers prior to onboarding.

### ASSESSMENT OF SAQ RESPONSES

MinRes has a process to identify and follow-up on significant 'red flag' SAQ responses, with the aim of enhancing awareness of modern slavery. Situations that constitute a red flag issue include:

- employment of workers considered to be underage
- retention of workers original personal identification and travel documents, such as passports or birth certificates
- workers who are required to pay for a job or provide a security deposit to their employer or recruitment agency, including termination fees
- workers who are not free to leave accommodation at will and live in substandard or overcrowded living arrangements
- workers who have no safe and easily accessible way to report grievances in their local language
- workers whose wages or pay entitlements are withheld, deducted or financial penalties are applied for misconduct and poor production outputs.

Where a 'red flag' response to the SAQ is identified, MinRes will engage with the supplier to clarify their response and obtain further information, determining if a corrective action plan or risk treatment is required in accordance with the *Human Rights Supply Chain Incident Management Procedure*.

Where a supplier returns a SAQ with a medium to high-risk rating, they are issued with an appropriate improvement notice. For example, where required, MinRes requests improvements to address gaps identified in SAQ responses, such as the development of policies and processes to identify, investigate and remedy the risk of modern slavery in their supply chain.

During FY25, we improved how we capture SAQ data and send out encouragement notices. Twenty-seven suppliers with high or medium-risk SAQ ratings received either encouragement notices or improvement opportunity notifications.

Where MinRes determines a supplier requires further review, we may complete a strategic review of the supplier including the request of additional information and clarifications, enhanced desktop reviews or a social compliance audit.

## SOCIAL COMPLIANCE AUDITS

We employ social compliance audits as a tool to further assess how our suppliers manage human rights exposures within their own operations and supply chain. MinRes recognises the importance of conducting social audits with our suppliers to promote transparency and to influence overall improvement in labour practices across our supply chain.

MinRes engages an independent auditor to carry out on-premises social audits, which review our suppliers' alignment with our modern slavery expectations, management processes and overall governance, consistent with the *United Nations Guiding Principles on Business and Human Rights*.

Importantly, in FY25, no evidence of human rights risks were found, however the audits served as a proactive tool for the identification of compliance and areas for improvement. Agreed corrective action plans were developed for three out of the four audits completed in FY25, with the final audit completed in June 2025. In conjunction with the suppliers, two corrective action plans were closed out in the same period with the remaining corrective action plan tracking to progress. The ongoing review and management of closing out the actions was integrated into the existing supplier relationship management model already in place with the suppliers.

The social compliance audit program has identified the following generalised improvements across those suppliers engaged:

- improvements to overarching documentation including code of conduct, human rights policies and ethical sourcing procedures
- subcontractor selection methodologies and the deployment of supply chain risk assessments
- implementation of a whistleblower policy and procedure, along with relevant training
- review of labour hire agreements
- revision of training requirements and standards for high-risk activities.

The social compliance audit program has been received favourably by our suppliers as a joint program designed to improve conditions for workers across the supply base and within their own businesses, despite the audits taking place at only one of their locations or facilities. This is an important step in increasing awareness and understanding of potential human rights risks with our suppliers.

In FY26, we will continue to deploy our social compliance audit program by identifying a pipeline of suppliers to engage with and by completing more audits at both Australian and overseas locations.

## SUPPLY CHAIN TRANSPARENCY FRAMEWORK AND PROGRAM

In FY24, we created a product-based risk assessment methodology, leveraging an existing technology solution, to evaluate seven high-risk categories for supply chain exposures beyond Tier 1. This approach became the foundation for our Supply Chain Transparency Framework and Program, which we continue to use today. (Refer to Figure 10.)

The framework provides us with a baseline for exploring supply chains with our direct suppliers by identifying and addressing leading indicators for human rights exposures. The proactive, but independent nature of the program allows for a shared approach with our suppliers to determine corrective actions and promotes transparency and accountability within the supply chain.

In FY25, we deployed supply chain questionnaires with a select number of strategic suppliers in high-risk commodities. Throughout FY25 we were able to use these questionnaires to deep dive into supply chain processes and suppliers for two key strategic suppliers, validating manufacturing processes and their supply chain, including locations and exposures, down to Tier 5.

In addition, those same two suppliers participated in our social compliance program, with one partnering with MinRes to conduct a social audit with a Tier 2 supplier. In FY26, we will continue to conduct social compliance reviews with more suppliers utilising this risk-based selection method. The program has not only allowed us to maintain a keen focus on high-risk areas but also facilitates scheduling of several reviews across different regions. The reviews are designed to foster proactive risk mitigation, drive transparency and ensure adherence to MinRes standards throughout the supply chain.

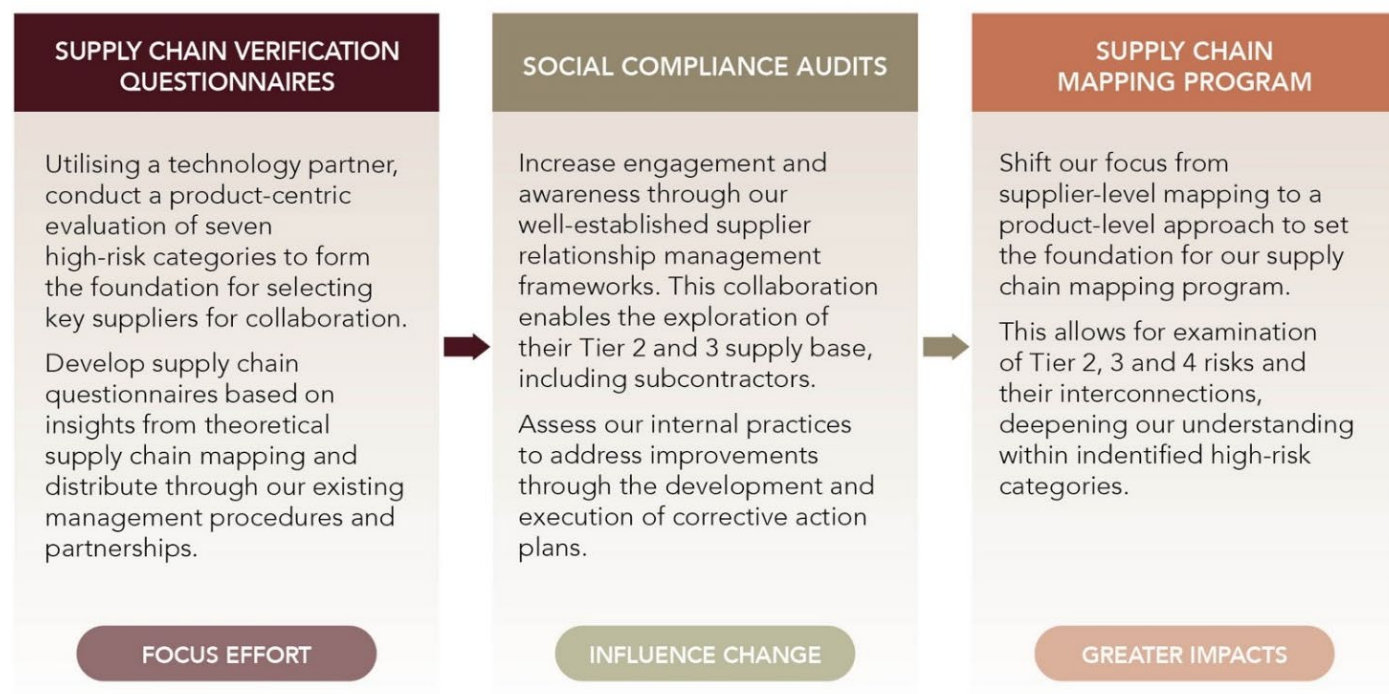


Figure 10: Supply Chain Transparency Framework and Program

## MODERN SLAVERY AWARENESS

In FY25, MinRes continued to deliver the human rights training module to new starters across key business units. The aim of this training is to build awareness among employees of our commitments and obligations relating to human rights.

The training module, accessed via our MinRes Learn platform, covers the definition and forms of modern slavery, potential risks within our supply chains and operations, due diligence measures to prevent and address these risks, and available internal and external avenues for remedy and guidance.

During the year, a further 79 key employees completed the module. Participants are required to undertake a competency assessment at the end of the session, testing their ability to recognise scenarios that may indicate modern slavery and to identify the most appropriate reporting channels in each case.

All employees, contractors and their personnel are also required to complete online *Code of Conduct* training during onboarding. In FY24, human rights and modern slavery awareness were incorporated into the *Code of Conduct* refresher training. In FY25, the completion rate for the updated version of the training was 95.39 per cent.<sup>12</sup> This ensures that our broader workforce, including those based on site, can access guidance and reference materials to help them identify and respond to concerns related to modern slavery.

For further information on how MinRes manages risk of Modern Slavery, refer to our [website](#).

<sup>12</sup> Employee completion rate excludes casual employees, interns, non-executive directors, employees on workers compensation and employees on long term leave, including parental leave.



## GRIEVANCE MECHANISM

To support the detection, reporting and prevention of modern slavery within our operations and supply chain, we encourage all internal and external stakeholders to raise concerns through the various reporting channels we have available.

MinRes has an established independent external whistleblowing service – MinRes Integrity Assist – which provides an avenue for MinRes stakeholders to raise concerns of suspected or actual misconduct in the workplace, including those related to human rights. Accounting and advisory firm Deloitte provides this service, which ensures a trusted and accessible grievance mechanism enabling anonymous reports. More information on the whistleblower service is available on our **website**.

In addition to MinRes' Integrity Assist, MinRes maintains a secondary internal reporting platform called Speak Up, which is underpinned by our *Speak Up Procedure*. This platform allows employees to raise and seek resolution to alleged disputes or grievances such as sexual harassment, bullying, discrimination, aggression and other related matters to the People team or through the Speak Up link on the company intranet, where they have the option of raising their concerns anonymously.

Reports submitted through this platform are subject to an internal workplace enquiry and/or investigation and in some cases the matter may be investigated by an independent third party. Workplace enquiries and investigations are initiated promptly and are managed in a confidential and sensitive manner for all parties, ensuring each matter is resolved fairly.

With respect to complaints relating to modern slavery or breaches of supply chain conduct during FY25, MinRes did not receive any complaints associated with modern slavery. One complaint was received in relation to an alleged breach of supply chain conduct however, an independently investigated found the allegation to be unsubstantiated.

## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

MinRes views an effective response to modern slavery as one that applies robust due diligence to identify potential and actual risks across our value chain, enabling our teams to prevent and mitigate human rights violations wherever possible. We are committed to regularly assessing the effectiveness of our actions to address modern slavery risks, ensuring we identify strengths and areas for improvement, and driving the continuous enhancement of our approach.

Accurately measuring the effectiveness of our actions can be challenging, given the often hidden nature of modern slavery and the complexities in interpreting quantitative data. We assess our success through increased awareness, strengthened governance practices, proactive due diligence processes and the number of modern slavery incidents identified via our grievance mechanisms.

During FY25, MinRes continued to strengthen its processes and procedures to address the risk of modern slavery practices in our supply chains. MinRes is committed to continuously improving our response to modern slavery and assessing the effectiveness of actions undertaken through the following measures.

### EXTERNAL BENCHMARKING

MinRes engages with top-tier organisations who assess our environment, social and governance performance, to disclose our sustainability and human rights performance. During FY25, these organisations included Morgan Stanley Capital International (MSCI), Sustainalytics, Institutional Shareholder Services (ISS) and FTSE Russell.

Additionally, MinRes leverages insights from the Australian Council of Superannuation Investors Limited benchmarking of ASX200 companies' performance against the Act, as well as Monash University's *Modern Slavery Disclosure Quality Report* benchmarking the reporting quality of ASX100 companies' *Modern Slavery Statements*. These independent assessments provide insight into best practice reporting and allow for the identification of opportunities for improvement within our business practices and disclosure.

### PERFORMANCE AGAINST OUR FY25 COMMITMENTS

As part of our commitment to continuous improvement, we track performance against our annual sustainability targets and annual commitments made in our preceding *Modern Slavery Statements*. Table 3 and Table 4 detail our progress against our FY24 sustainability targets and the commitments made in our 2024 *Modern Slavery Statement* respectively.

Table 3: Performance against our FY25 annual sustainability targets

● TARGET MET      ● PARTIALLY MET      ● COMMITMENT NOT MET

MATERIAL THEME	TARGET	PERFORMANCE
Ethics and integrity	Zero incidence of bribery and corruption.	Target met, no substantiated incidents of bribery and corruption during the reporting period.
Ethics and integrity	Zero major social incidents.	Target met, no major social incidents during the reporting period.
Ethics and integrity	≥ 90 per cent employee completion rate of our Code of Conduct training as at end of year. <sup>13</sup>	The target met, 95.39 per cent completion rate.

<sup>13</sup> Employee completion rate excludes casual employees, interns, non-executive directors, employees on workers compensation and employees on long term leave, including parental leave.

<b>Responsible supply chain</b>	≥ 95 per cent of suppliers screened for social criteria risks as at end of year. <sup>14</sup>	Target met, 100 per cent <sup>15</sup> of our active suppliers screened.
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Table 4: Performance against our FY25 commitments

THEME	COMMITMENT	PERFORMANCE
<b>Leadership and governance</b>	Embed modern slavery leadership, response and capabilities across the business.	<p>The Board receives a monthly update on the percentage of suppliers screened in accordance with our sustainability target.</p> <p>The Sustainability Committee is provided with an update annually which outlines our progress against targets and commitments.</p> <p>Quarterly Human Rights Working Group meetings.</p>
<b>Technology</b>	Remain current with technological solutions to better manage, screen, monitor and gain insights across the supply chain and its associated risks, automating processes where practicable.	Automation of the SAQ process completed in FY25 in conjunction with the Supply team's supplier information management project.
<b>Risk review</b>	Establish automated risk assessment processes as practicable and integrate into all relevant business systems.	<p>Integration and alignment of risk treatment and remediation for possible human rights exposures to our MinRes risk management framework.</p> <p>Continued to monitor any requirements for enhanced due diligence as part of our overall risk screening program.</p>
	Enhance risk awareness across multiple tiers of the supply chain and within our customer base.	Continued to conduct social compliance audits to enable a risk-based dialogue with our suppliers and corrective action plans assist to manage and monitor improvements.
<b>Policy suite</b>	Embed review of applicable policies, procedures, standards, and contracts, to ensure that they reflect emerging risks and the Group's approach and commitment to addressing modern slavery.	<p>Updated/refreshed the following policies and procedures:</p> <ul style="list-style-type: none"> <li>• <i>Gendered Diversity Statement</i></li> <li>• <i>Indigenous Peoples Policy</i></li> <li>• <i>Sustainable Procurement Standard</i></li> <li>• <i>Strategic Procurement Procedure</i></li> <li>• <i>International Counterparty Engagement Procedure</i></li> </ul>

<sup>14</sup> Suppliers are screened against a number of social criteria to determine potential exposure to criminal activities and regulatory violations, including but not limited to, conflict and humanitarian crises, bribery and corruption, sanctions, money laundering, politically exposed persons, human rights abuses and modern slavery incidents by third-party platform.

<sup>15</sup> External limited assurance is provided over our FY24 suppliers screened. Refer to our 2025 Sustainability Report for a copy of the Independent Limited Assurance Statement.



THEME	COMMITMENT	PERFORMANCE
		<ul style="list-style-type: none"> <li>• <i>Human Rights Supplier Due Diligence Procedure</i></li> </ul> <p>Developed and implemented the following procedures:</p> <ul style="list-style-type: none"> <li>• <i>Supply Chain Human Rights Incident Management Procedure</i></li> </ul> <p>All policies are publicly available on our <b>website</b>.</p>
<b>Due diligence, strategy and remediation</b>	Improve and uplift supplier practice through deeper dive due diligence activities in collaboration with selected suppliers to better understand modern slavery risks across multiple tiers.	Continued to deploy the Supply Chain Transparency Framework and Program to selected, strategic suppliers.
	Agree fit-for-purpose approach to findings and recommendations relating to our first international social audit.	<i>Corrective Action Plan</i> was co-developed and closed out in FY25 with monitoring in place.
	Continue to deploy our social audit program.	Identification of key suppliers in high-risk commodities in conjunction with our Category teams and existing supplier relationship management program. Four completed in FY25.
	Develop insights and actions from supply chain questionnaires.	Supply chain mapping via questionnaires with those suppliers identified for social audits enables a deeper understanding of their supply chain and the ability to co-develop <i>Corrective Action Plans</i> for meaningful change. Four completed in FY25.
	Continue to review and update existing SAQ.	Continually monitor our SAQ and its application across our supply base. In FY25, automating this process enabled the assessment of all suppliers with an original high-risk rating at the point of onboarding.
<b>Training</b>	Conduct company specific training to increase awareness across the Board, supply team and supply chain to improve the identification and remediation of modern slavery risks relevant to MinRes.	Continued to roll out a human rights training module across key business units via our MinRes Learn platform.
<b>Stakeholder engagement and collaboration</b>	Commence engagement with suppliers across multiple tiers.	Deployed targeted questionnaires to strategic suppliers in high-risk commodities, enabling comprehensive supply chain mapping, down to Tier 5, that directly inform our social audit initiatives.

THEME	COMMITMENT	PERFORMANCE
	Join advisory group/s in relevant industries to establish longer-term relationships.	<p>The Human Rights Working Group meets quarterly to progress actions and share emerging trends/learnings.</p> <p>We maintain active membership with the Human Rights Resources and Energy Collaborative.</p> <p>We are an active signatory to the UN Global Compact.</p>
	Enhance communication and consultation processes with joint venture partners across the year.	<p>This Statement was prepared in consultation with our joint venture partners, Albemarle Corporation (Albemarle), Ganfeng Lithium Group Co Ltd (Ganfeng) and API Management Pty Ltd as it pertains to our Wodgina, Mt Marion and Onslow Iron operations respectively.</p>
<b>Grievance mechanisms</b>	Continually improve the effectiveness and accessibility of our grievance mechanisms and timely company response.	<p>In FY25, MinRes' grievance mechanism continued to provide an effective and accessible platform for confidential reporting of grievances.</p> <p>This was further enhanced following the appointment of the dedicated role of Director Governance and Compliance with specific responsibility for managing the whistleblowing function, with direct reporting of significant whistleblower reports to the Ethics and Governance Committee enabling prompt and responsive action.</p>

# CONSULTATION AND COLLABORATION

## CONSULTATION

MinRes and its subsidiary entities are owned and controlled as an integrated Group. As a result, all subsidiary entities are covered under the MinRes corporate governance suite, including policies and procedures relating to human rights, due diligence assessment and remediation, grievance mechanisms and consultation processes.

All subsidiary entities have in place shared directors with the Group. No consultation occurs between subsidiary entities owned and controlled as management of modern slavery risks across the Group is embedded in MinRes' corporate governance and risk assessment processes.

This Statement was prepared in consultation with subject matter experts from across MinRes, including Sustainability, Supply, Health and Safety, People, Legal, Shipping, Contracts and Controls, Communications, Corporate Affairs, Shipping and Marketing, who are responsible for implementing and advancing the sustainable procurement and modern slavery program.

Prior to Sustainability Committee endorsement and Board review and approval, this Statement was also reviewed by the MinRes Human Rights Working Group.

## OUR STAKEHOLDERS

MinRes works closely with a broad spectrum of stakeholders. We maintain active dialogue with these stakeholders to communicate our expectations regarding behavioural and procedural standards, particularly in relation to human rights principles and the prevention of modern slavery. Our stakeholders include employees, contractors, suppliers, customers, local communities, tenement and landholders, joint venture partners, investors, government agencies, regulators, industry associations and trade unions.

We communicate and disclose our performance to stakeholders through our investor roadshows, full year and half year results briefings, the Annual General Meeting, ad hoc investor meetings, our website and various media platforms.

We maintain open communication channels with our stakeholders to ensure a timely response to requests, queries and concerns. Additionally, we have a dedicated Modern Slavery Support page on our **website**, which provides access to documents, our *Modern Slavery Statements* and a point of contact for our suppliers.

## COLLABORATION

Engaging in multi-stakeholder initiatives, industry groups is key to better understanding and managing modern slavery risks across our operations and supply chain. During FY25, we actively participated in the following industry partnerships and initiatives.

### UN Global Compact



MinRes is a signatory to the United Nations Global Compact, strengthening our commitment to the fundamental human rights principles as recognised in the Universal Declaration of Human Rights. Our *2025 Sustainability Report* outlines our performance and our ongoing commitment to disclose our performance against the UN Global Compact Ten Principles.

MinRes has continued to participate in the Global Compact Network Australia's Modern Slavery Community of Practice, which provides a forum for sharing best practices and learning from peers and subject matter experts.

### Human Rights Resource and Energy Collaborative



MinRes is also an active member of the HRREc, which was formed to provide a forum for companies in the resources and energy sectors to share knowledge, improve practices and develop resources to better combat modern slavery across our industries. HRREc has met three times this year, with MinRes being present at all meetings.



## LOOKING **AHEAD**

We remain committed to addressing modern slavery risks across our operations and supply chain by strengthening awareness, enhancing due diligence and refining our responses to identified risks.

In FY26, we will progress the following key initiatives:

### **Leadership and governance**

- Continue to evaluate human rights related policies, procedures and risk appetite statement to ensure alignment with evolving legal requirements and best practice.

### **Risk review**

- Ensure modern slavery risks are reviewed and effectively captured in both strategic and operational risk registers to ensure the appropriate risk controls are in place.

### **Due diligence, strategy and remediation**

- Continue to deploy our social audit program in collaboration with selected suppliers to better understand modern slavery risks across multiple Tiers.
- Develop insights and actions from supply chain questionnaires.

### **Training**

- Review and update our company specific human rights training module as required to ensure training remains up to date and relevant to the needs of the business.
- Stakeholder engagement and collaboration.
- Continue to engage in multi-stakeholder initiatives and with industry groups and suppliers across our supply chain.

## APPENDIX 1: **MSA REPORTING CRITERIA INDEX**

This Modern Slavery Statement was prepared to meet the mandatory reporting criteria of the Modern Slavery Act 2018 (Cth).

SECTION 16 MODERN SLAVERY ACT CRITERIA	REFERENCE IN THIS STATEMENT
a) Identify the reporting entity.	About this Statement (page 3).
b) Describe the structure, operations and supply chains of the reporting entity.	Our structure, operations and supply chain (pages 5-10).
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Identifying risks of modern slavery (pages 11-16).
d) Describe the actions taken by the reporting entity and any entity it owns or controls, to assess and address those risks, including due diligence and remediation processes.	Assessing and addressing modern slavery risk (pages 17-21).
e) Describe how the reporting entity assesses the effectiveness of such actions.	Assessing the effectiveness of our actions (pages 22-25).
f) Describe the process of consultation with: <ul style="list-style-type: none"> <li>(i) any entities that the reporting entity owns or controls.</li> <li>(ii) in the case of a reporting entity covered by a statement under section 14 the entity giving the statement.</li> </ul>	Consultation and collaboration (page 26).
g) Provide any other relevant information.	Looking ahead (page 27).

### IMPORTANT NOTICE

When used in this Statement, the words, "could", "potentially", "expect", "continues", "intend", "to be", "may", "plan", "seek", "should", "will", "would", "believe" and similar expressions, as they relate to the Company, are intended to identify forward-looking statements. The forward-looking statements are based upon certain assumptions and information available to the Company as at the date of this document. Forward-looking statements are not a guarantee of future performance as they involve risks, uncertainties and other factors, many of which are beyond the Company's control and may cause results to be different from statements in this document. The Company cautions against undue reliance on any forward-looking statements.

To the fullest extent permitted by law, MinRes and its officers, directors, employees and agents, accept no responsibility for any information provided in this document, including any forward-looking statements, and disclaim any liability whatsoever (including for negligence) for any loss howsoever arising from any use of this document or reliance on anything contained in or omitted from it or otherwise arising in connection with this. This document should not be relied upon as a recommendation by, or advice from, MinRes to deal in its securities. This document should be read in conjunction with MinRes' other periodic and continuous disclosure announcements lodged with the Australian Securities Exchange (ASX).



**A:** 20 WALTERS DRIVE, OSBORNE PARK,  
WESTERN AUSTRALIA 6017

**P:** LOCKED BAG 13,  
OSBORNE PARK DC, WA 6916

**T:** +61 8 9329 3600

**E:** [reception@mineralresources.com.au](mailto:reception@mineralresources.com.au)

**W:** [www.mineralresources.com.au](http://www.mineralresources.com.au)