

# Baosteel Resources Australia Pty Ltd

ABN 66 154 815 36

### BAOSTEEL

# **Modern Slavery Statement**

#### 1. Introduction

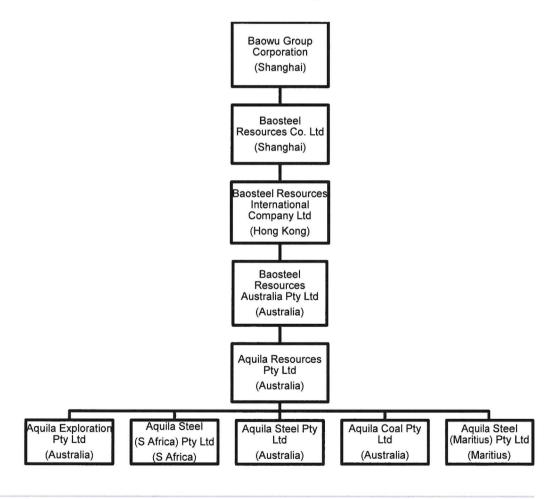
This statement outlines Baosteel Resources Australia Pty Ltd's (ACN 154 815 362) (Baosteel's) approach to identify and address the risks of modern slavery in its operations and supply chains. This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) for the financial year ending 31 December 2024.

#### 2. Our Structure

### 2.1 Baosteel Group

Baosteel is a subsidiary of China Baowu Steel Group Corporation Limited (**Baosteel Group**), a leading global iron and steel enterprise based in Shanghai, China. Baosteel Group was established on 23 December 1978 and has operations in Shanghai, China, South Africa, Mauritius and Western Australia.

A simplified corporate structure of the Baosteel Group is provided below:



#### 2.2 Baosteel in Australia

Baosteel is an Australian proprietary company with approximately 25 employees in Australia. Our principal place of business is Level 21, 77 St Georges Terrace, Perth WA 6000.

Aquila Resources Pty Ltd (ACN 092 002 769) (**Aquila**) is an 85% owned Australian incorporated subsidiary of Baosteel. Aquila has approximately 20 employees based in Western Australia and has the same principal place of business as Baosteel. Baosteel's other controlled entity, Baosteel Financing 2015 Pty Ltd (ACN 603 604 753), was deregistered with Australian Securities & Investments Commission on 4 November 2020 as there were no ongoing operations in this entity.

# 3. Our Operations and Supply Chain

#### 3.1 Operations

Baosteel is a joint venture partner in the Bao-HI Ranges Joint Venture, an iron ore project located in the Pilbara region of Western Australia, with production from the Eastern Range iron ore deposit located about 10 kilometers south of Paraburdoo. Baosteel holds a 46% ownership interest in the joint venture. Rio Tinto holds a 54% ownership interest through its entity, Hamersley Iron Pty Limited (ACN 004 558 276). The joint venture encompasses a range of activities, including the production and supply of iron ore.

Aquila works with its joint venture partner, AMCI (IO) Pty Ltd, in the Australian Premium Iron Joint Venture (**APIJV**) in the Pilbara region of Western Australia. Aquila holds a 50% interest in the APIJV. This joint venture is managed by API Management Pty Ltd (**APIM**). Aquila (together with its joint venture partner in the APIJV) is working on mining and logistics infrastructure solutions required to deliver the West Pilbara Iron Ore Project.

Aquila indirectly holds a 22% interest in the Red Hill Iron Joint Venture (**RHIOJV**) in the West Pilbara region of Western Australia. That interest is held by APIM as agent for Aquila, with a 21% interest held by APIM as agent for AMCI (IO) Pty Ltd. Onslow Iron Pty Ltd (ACN 649 012 395) (**Onslow Iron**) (wholly-owned by Mineral Resources Ltd) holds the remaining 57% interest in the RHIOJV and is also the manager of the RHIOJV and the Onslow Iron Ore mine held under the RHIOJV. First ore on ship was achieved in May 2024.

In addition, Aquila previously owned the Eagle Downs Metallurgical Coal Project (together with its former joint venture partner, South32. in the Eagle Downs Coal Joint Venture), which is a fully permitted, partially developed, proposed underground longwall coal mine south of Moranbah in Queensland's Bowen Basin, but its interest in the Eagle Downs Metallurgical Coal Project was sold on 13 August 2024.

### 3.2 Supply Chain

As the operator of the Bao-HI Ranges Joint Venture, Rio Tinto provides the services of construction and production on the Paraburdoo Eastern Ranges mine. As Baosteel is not the operator of the project, Baosteel's supply chain of these operations is limited and consists of one (1) manager located offsite in Baosteel's office in the Perth CBD, to monitor the operation of the project and provide professional services, such as legal, financial, accounting or insurance

APIM is the manager of the APIJV. APIM employs some personnel directly, seconds some personnel from Aquila and engages a few personnel from Australian incorporated labour hire companies. APIM is responsible for the procurement of goods and services required for the APIJV operations.

Onslow Iron is the manager and operator of the RHIOJV. Any personnel engaged in the RHIOJV operations are engaged by Onslow Iron Pty Ltd in its capacity as manager and not directly by the RHIOJV. Onslow Iron is responsible for the procurement of goods and services required for the RHIOJV operations.

# 4. Modern Slavery Risks in Operations and Supply Chain

Baosteel considers their direct operations to be at a low risk of modern slavery due to the nature of its investment activities in Australia. While Baosteel is not directly engaged in office maintenance activities, we are aware that some industries such as the cleaning sector may have higher risks of modern slavery practices and we are committed to monitoring these risks in our business and consider collaboration with relevant stakeholders.

While Baosteel's direct operational involvement is limited, Baosteel has identified that as a joint venture partner, and a shareholder of Aquila, that it may be at risk of indirectly contributing to modern slavery practices in Australia through these relationships. These practices include the engagement of suppliers of products and services used in the mining operations such as trucks, building products and services, mining equipment, transport, catering and temporary accommodation facilities. There is a potential risk of subcontracting to other companies with the lowest prices and the underpayment of workers.

Baosteel has identified that it may be at risk of contributing to modern slavery by the secondment of employees from its parent company in China to undertake work in Australia and has taken that into consideration in developing and its actions and strategies to address and minimise these risks (see section 5 below).

## 5. Actions Taken to Assess and Address the Modern Slavery Risks

In respect of Baosteel's participation in its joint ventures, as a non-operator and non-manager, Baosteel is not in a position to directly control the supply chains for those investments and relies on the operator or manager of the site to follow its due diligence processes and risk management to identify countries with a high risk of modern slavery, high risk goods and services. This includes the operator or manager implementing specific internal processes such as "Know Your Supplier" and providing personnel with the skills and knowledge on how to identify "red flags" of modern slavery risks. Baosteel engages in informal oversight of the actions and processes its joint venture partners have in place to address modern slavery risks. It also carries out its own due diligence to ensure that its joint venture partners are meeting their obligations in relation to management of these risks.

For example, Baosteel has undertaken a review of the latest modern slavery statement of our joint venture operator, Rio Tinto, to assess the actions taken to assess and address modern slavery risks in operations. This review revealed that our joint venture partner has robust processes in place to assess and mitigate against modern slavery practices, which aligns with Baosteel's standards and expectations. These include, for example, policies and procedures (such as their Human Rights Policy or Supplier Code of Conduct); a risk management framework and risk assessments; audits and due diligence processes; confidential reporting mechanisms; and effectiveness assessments in relation to the mitigation of modern slavery practices.

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

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

No significant issues were identified that would require additional action or further information from the operator. Baosteel remains committed to ongoing engagement and collaboration with its joint venture partners to continuously evaluate and enhance modern slavery risk assessment and mitigation strategies in the future.

In respect of Baosteel's workers who are engaged from China, these workers are employees of Baosteel's parent company in Shanghai, China. The workers are sponsored by the parent company to work in Australia and the visa process is managed by Baosteel's parent company. Baosteel's Human Resources Department ensures that the workers have the correct visa to work in Australia, including undertaking a visa condition check (VEVO). It is a precondition of their engagement that the workers have the legal right to work in Australia. Human Resources also ensures that Australian employment legislation and regulations are strictly adhered to, as well as Baosteel's policies and procedures in relation to overtime work compensation and leave.

Aquila's personnel are mainly employed by contract in accordance with Australian employment legislation and a few of Aquila's personnel are seconded from Baosteel. Aquila personnel are required to comply with Aquila's code of conduct (which includes provision of personnel access to an external employee assistance program) and supplier management policy.

### 6. Assessing the Effectiveness of these Actions

As noted above. As a non-operator joint venture interest holder, Baosteel is not able to exert direct control over the actions and processes taken by Baosteel's joint venture operators to respond to modern slavery risks in their operations and supply chains. Having said that, Baosteel ensures that it has some oversight over the systems and processes implemented by its joint venture operators and carries out its own due diligence processes to assess whether its joint venture operators are complying with their obligations to address modern slavery risks in their supply chains and operations. As noted in section 5, this has included reviewing the modern slavery statements submitted by Baosteel's joint venture operators and assessing the effectiveness of the actions set out in those statements. In addition, Baosteel participates in regular operational and governance meetings with its joint venture operators and partners and modern slavery risks are discussed periodically at those meetings.

Baosteel appreciates that although it is a minority, non-operator joint venture partner and shareholder it is still required to take an active role to identify and reduce the risks of modern slavery in its joint venture operations. As such, Baosteel will continue to work collaboratively with its joint venture partners and stakeholders over the next 12 months on actions which can be taken to enhance modern slavery risk management in its joint venture operations and related supply chains.

In respect of the ex-patriate employees, Baosteel ensures visa and employment checks are undertaken by its Human Resources personnel on each individual employee prior to commencing work in Australia. These checks have worked well, and no issues have been identified to date.

### 7. Consultation Process

In preparing this modern slavery statement, Baosteel consulted with its controlled entity Aquila through one of its directors, who is a director of Aquila and Baosteel, as well as through Aquila's Chief Operating Officer and Chief Financial Officer. It was through these channels that Aquila was made aware that Baosteel was reviewing and updating its previous modern slavery statement and was provided with an opportunity to participate in the process.

As mentioned in paragraph 2.2 of this statement, consultation with Baosteel's other entity, Baosteel Financing Pty Ltd (ACN 603 604 753), was not necessary as this entity is now deregistered.

This statement has been approved and endorsed by the board of directors of Baosteel Resources Australia Pty Ltd (ACN 154 815 362).

Signed and approved on 08 September 2025 by:

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Yong Zhang

Director