



Windfield Holdings

2023

Modern Slavery Statement



ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the traditional custodians of the lands and waters of Noongar Country. We pay respects to Elders, past, present, emerging and future. We recognise the traditional custodians' unique connections to their lands and waters, lore, language, kinship, and ceremony. Through this acknowledgement, we commit to ongoing learning and understanding on our journey to reconciliation. We also pay respect to the cultural authority of Aboriginal and Torres Strait Islander people from other areas of Australia.



Contents

CHIEF EXECUTIVE OFFICER'S MESSAGE	2
STATEMENT ON THE REPORTING ENTITY	3
2023 HIGHLIGHTS	4
OPERATIONS AND SUPPLY CHAINS	6
SUPPLY CHAIN	9
MODERN SLAVERY RISKS	12
OUR ACTIONS	14
OTHER INFORMATION	18
REPORTING CRITERIA AND CORRELATING PAGE REFERENCES	18



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Conducting our business in an ethical manner, with respect for human rights, is core to our values.

”

Chief Executive Officer's Message

This statement marks our fourth year of reporting under the Modern Slavery Act 2018 (Cth), our focus has been on maturing our approach to modern slavery due diligence in our supply chain, strengthening the foundations of our framework, reflecting on the effectiveness of existing systems and making adjustments as part of our commitment to continuous improvement.

Windfield is dedicated to ensuring that its suppliers, contractors and subcontractors adhere to Windfield's internal policies and legal requirements, aiming to eradicate modern slavery and human trafficking globally. Consequently, Windfield endeavours to foster a supply chain culture that is devoid of modern slavery, human trafficking, and any other form of unjust, unethical, or illegal employment practices.

Slavery and human trafficking unfortunately persist as global societal issues. At Windfield Holdings, we take pride in our unwavering dedication to ethical and transparent employment practices, which are foundational to our corporate ethos. The Modern Slavery Act (2018) established legal frameworks that have long been integral to Windfield's commitment to fair employment.

Conducting our business in an ethical manner, with respect for human rights, is core to our values. We continue to work towards embedding modern slavery considerations in our activities to ensure that it becomes part of our business-as-usual approach, much like workplace safety and quality. It is incumbent on us to adopt

this mindset to operationalise our human rights commitments.

This statement was prepared with the input of representatives from several functions including procurement, human resources, legal and compliance. Each of these individuals have Australia-wide responsibility, which includes Windfield and the subsidiaries to which this statement applies. Accordingly, this statement was prepared in consultation with Windfield, the reporting entity, and its owned or controlled entities.

This statement was approved by Windfield's Board of Directors.

Lorry Mignacca
Chief Executive Officer

Statement on the Reporting Entity

Windfield Holdings Pty Ltd (*Windfield, Company, we, us, our*) is an Australian private company, owned by joint venture partners Tianqi Lithium Energy Australia (a joint venture between Tianqi Lithium Corporation and IGO Lithium Holdings) and Albemarle Corporation. The Company is registered at Level 15, 216 St Georges Terrace, Perth WA, 6000. This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (*MSA, Act*) for the year ending 31 December 2023 (*Reporting Period*). Windfield, the reporting entity, makes this single Modern Slavery Statement to cover the Windfield group.

Windfield group corporate structure is outlined in Figure 1.

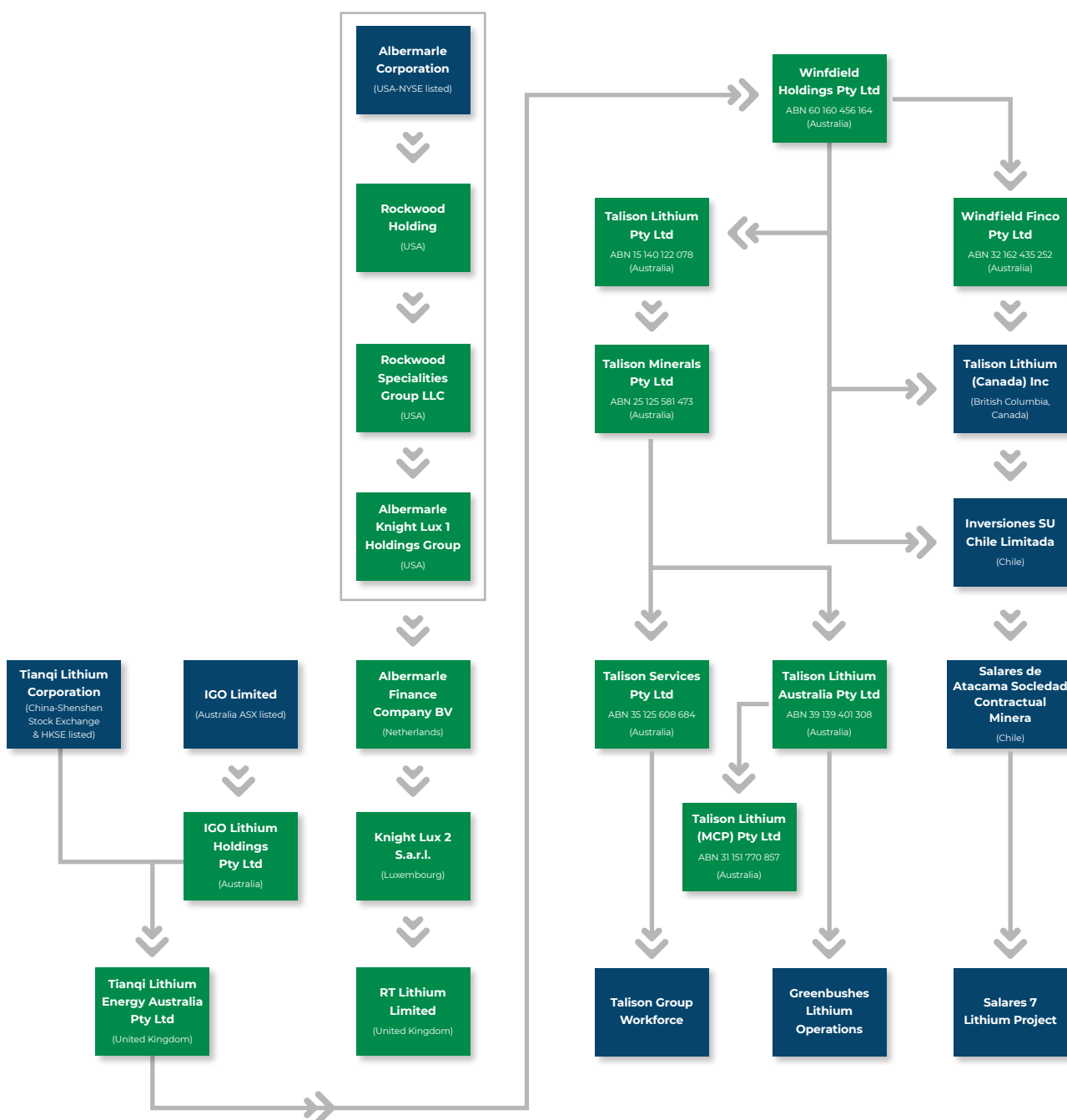


Figure 1: Windfield Group Corporate Structure

2023 Highlights

Throughout 2023, we made significant progress in strengthening our efforts to combat modern slavery.

Our Values

RESPECT
INTEGRITY
HONESTY
COMMUNITY FOCUS
TRUST
FAIRNESS

Enhanced Supplier Engagement:

We saw an increase in the number of vendors completing modern slavery questionnaires, fostering greater transparency within our supply chain.

Dedicated Expertise:

We appointed an Assurance and Governance Advisor to specifically focus on supply chain due diligence, ensuring a more comprehensive approach.



Clear Expectations:

We developed a Supplier Code of Business Conduct and Ethics, outlining our expectations regarding human rights and modern slavery prevention within our supplier network.



Protecting Young Workers:

We updated our Minimum Working Age Standard to align with International Labour Organisation (ILO) standards, further safeguarding vulnerable individuals.

Tailored Outreach:

We created a modern slavery questionnaire procedure and a simplified supply chain survey specifically designed for small businesses, ensuring inclusivity throughout the process.

Empowering Our Workforce:

We provided tailored training for procurement staff and rolled out a modern slavery awareness module for all employees, raising awareness and promoting responsible practices across the organisation.



Long-Term Commitment:

We prepared a Human Rights Impact Assessment and a Human Rights Management Plan, demonstrating our commitment to ongoing evaluation and improvement.

These advancements reflect our dedication to building a more ethical and sustainable supply chain, free from modern slavery and other harmful practices.



Operations and Supply Chains

Our Operations

Located at Greenbushes, 250km south of Perth in Western Australia (Site, Mine), The Greenbushes Lithium Operation directly employs some 707 people on a permanent full time or part time basis and a further 49 casuals. In addition, our corporate office in Perth employs 72 people.¹ Besides our direct employees, around 325 contracted service providers provide additional personnel at our operations.

Windfield and its predecessor companies have been producing lithium at Greenbushes since 1983 and the area is recognised as one of the world’s largest hard rock deposit of the lithium mineral spodumene. Greenbushes is also the longest continuously operated mining area in Western Australia following the discovery of tin in 1888 and subsequent development of tantalum and lithium deposits.

An overview of the functions of each subsidiary is set out below:

Talison Lithium Pty Ltd	Engages with suppliers and performs a corporate function. It does not have employees.
Talison Minerals Pty Ltd	Investment entity. It does not perform any day-to-day functions.
Talison Lithium Australia Pty Ltd	Owens and operates the Greenbushes Lithium Operation.
Talison Services Pty Ltd	Employs the workforce.
Talison Lithium (MCP) Pty Ltd	Dormant Entity
Windfield Finco Pty Ltd	Dormant Entity

1. The increase in headcount from the 2022 statement stems from the correlating increase in the expansion of the Greenbushes operations.

In November 2023, we sold 100% of our interests in the Salares 7 Lithium Project in Chile (Project). The Project remained in care and maintenance up until the time of sale.

The lithium orebody has produced and exported lithium minerals from Site for more than three decades. Our production process from mine to market is outlined in Figure 2.

Perth Office

The following roles are performed out of our Perth office or in hybrid arrangements:

- Senior management team including the Chief Executive Officer, Chief Financial Officer and Chief Information Officer
- Legal
- Approvals
- Shipping and Logistics
- Information and Operational Technologies
- Finance, including Accounts and Payroll

Exploration and Development

Evaluation of geological, geophysical and geochemical data will indicate the possibility of a deposit in a target area. Drilling enables the evaluation of the type and grade of minerals in the ground, samples are then laboratory tested identifying the concentration of elements including lithium within them.

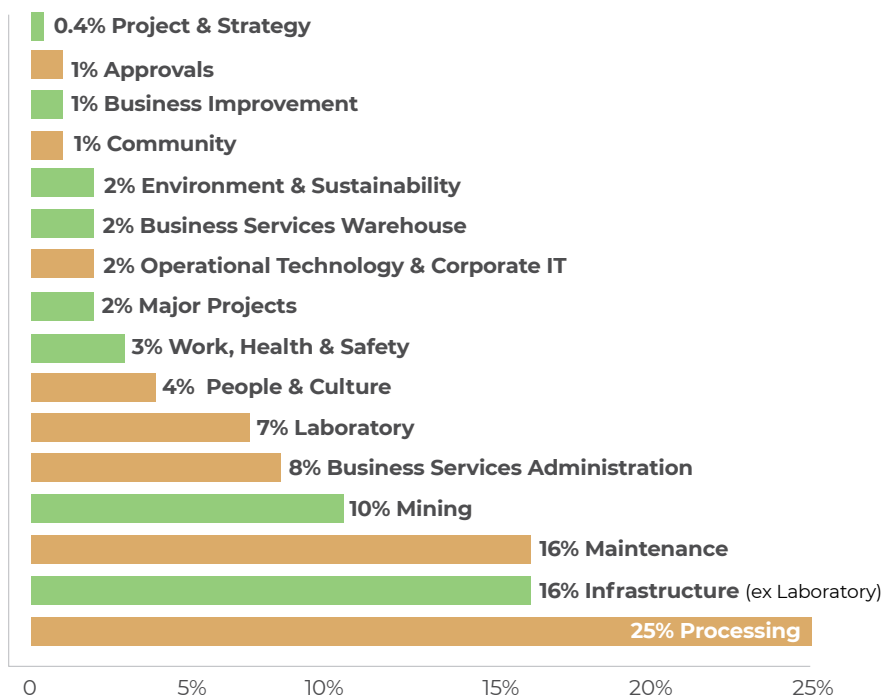
Geologic modelling is then undertaken of the orebody to create a model of what the resource may look like.

Development and design can then be undertaken, where mine engineers determine mining methods, optimum mine size and schedule, and equipment requirements that will maximise the safety and efficiency of production.

Workforce

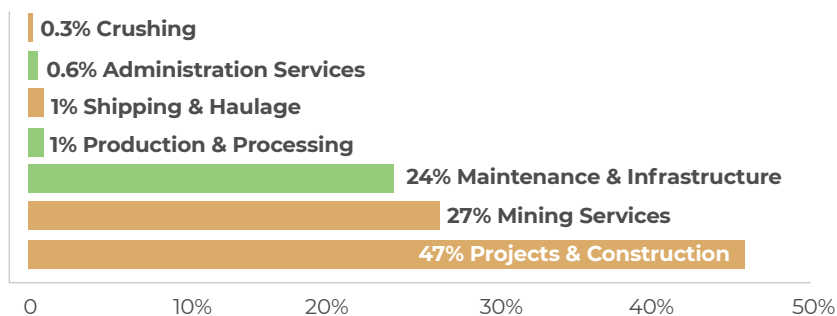
Direct Workforce

Our direct workforce comprises diverse roles, across a number of disciplines, as shown in the chart below.



Indirect Workforce

The contractor workforce perform roles in mining, projects & construction and maintenance. The chart below shows an indicative breakdown of the types of roles performed by contractors:



Mining and Crushing

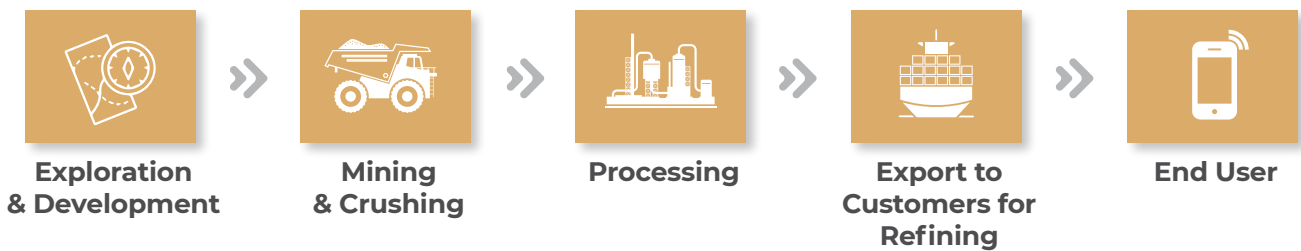
When operating the mine, we use stringent controls to prevent and manage any environmental impacts.

Detailed mine planning is undertaken to ensure the ore body is mined in an efficient and responsible manner.

Haul trucks transport the ore from open pits to processing operations. Some ore may be stockpiled for later processing. Material not economical to process is stored in overburden rock storage areas.

Ore is deposited directly on a run of mine stockpile, and fed through a crushing plant to reduce the size of the particles to be used as feed to the processing facility.

Figure 2: Mine to Market Operations



Processing

Ore is processed according to grade and concentration of elements.

All process plants utilise grinding, heavy media separation and flotation processes to extract spodumene ore from other minerals, upgrading to a range of lithium concentrates for bulk and bagged shipments.

After the ore has been processed and a spodumene concentrate extracted, the leftover waste material, called tailings, are stored in tailings facilities.

All tailings storage facilities adhere to the Australian National Committee on Large Dams (ANCOLD) standards.

Export to Customers

Our journey begins with on-site laboratory analysis. Samples are meticulously tested to ensure the spodumene concentrate meets

the exact chemical and physical characteristics required by our customers.

Once quality is confirmed, the concentrate is transported via bulk road haulage to designated storage facilities. These facilities are strategically located near the Mine, as well as close to and at the port of Bunbury.

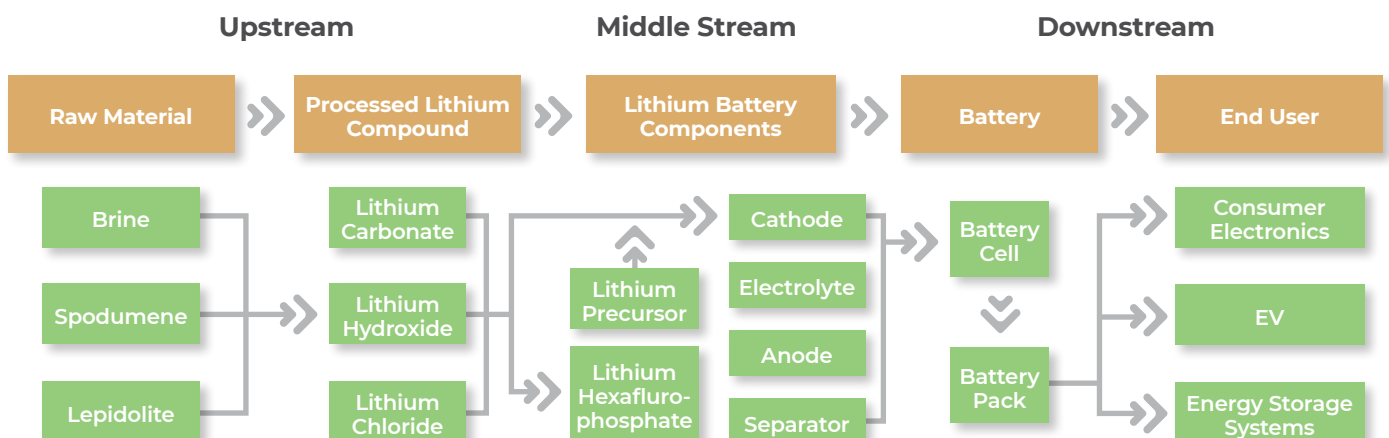
From these storage locations, the spodumene concentrate embarks on its final leg. We utilise two primary shipping methods:

- Bagged container shipments: These are ideal for smaller quantities and offer flexibility for diverse destinations. They depart from the port of Fremantle.
- Bulk shipments: Larger volumes are efficiently transported via bulk shipments departing from Bunbury Port.

Our minerals are shipped primarily to Asia for refining. Some refining takes place in Western Australia, at Kemerton and Kwinana. Albemarle and Tianqi Lithium Energy Australia, our joint owners, are our only customers of spodumene concentrate. Windfield does not sell to the open market. Albemarle processes spodumene at their facilities in Kemerton, and also the US, China and Europe and Tianqi Lithium Energy Australia at their facilities in Kwinana and China, all to produce lithium chemicals. They then supply lithium chemicals to international customers for the production of lithium-ion battery for application in the electrical vehicle and energy storage industries .

The table below depicts the lithium-ion battery value chain and where spodumene sits within that chain:

Lithium-ion Battery Value Chain





Supply Chain

We have over 1500 approved suppliers, across multiple sector classifications. During the Reporting Period, we upgraded our enterprise resource program to SAP and conducted an audit to remove any expired suppliers. In this time, an additional 253 new suppliers were prequalified. Over 50% of our procurement spend in 2023 was with Perth-based businesses, with the main areas of spend in earthmoving and materials processing equipment, construction of camp accommodation, shipping, fuel, on-site surface mining operations, engineering, structural steelwork and bulk haulage.

\$1.3 billion Spend
1,500 Approved Vendors

A majority of Windfield's direct (tier one) vendors are based in Western Australia.

Total = \$1.3b

Australia Spend



International



Australia \$1.19b

WA



Other



WA \$0.977b

Perth 68.7%



South West

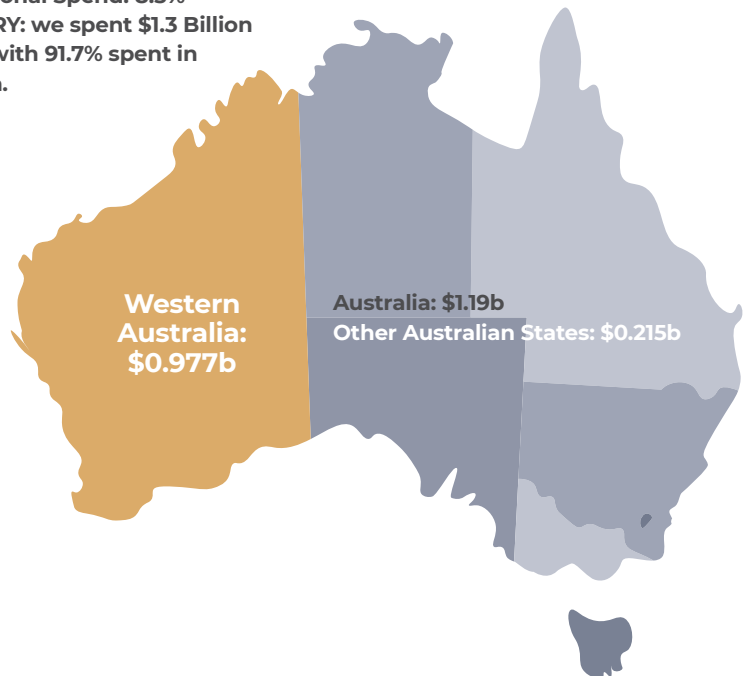


Regional WA



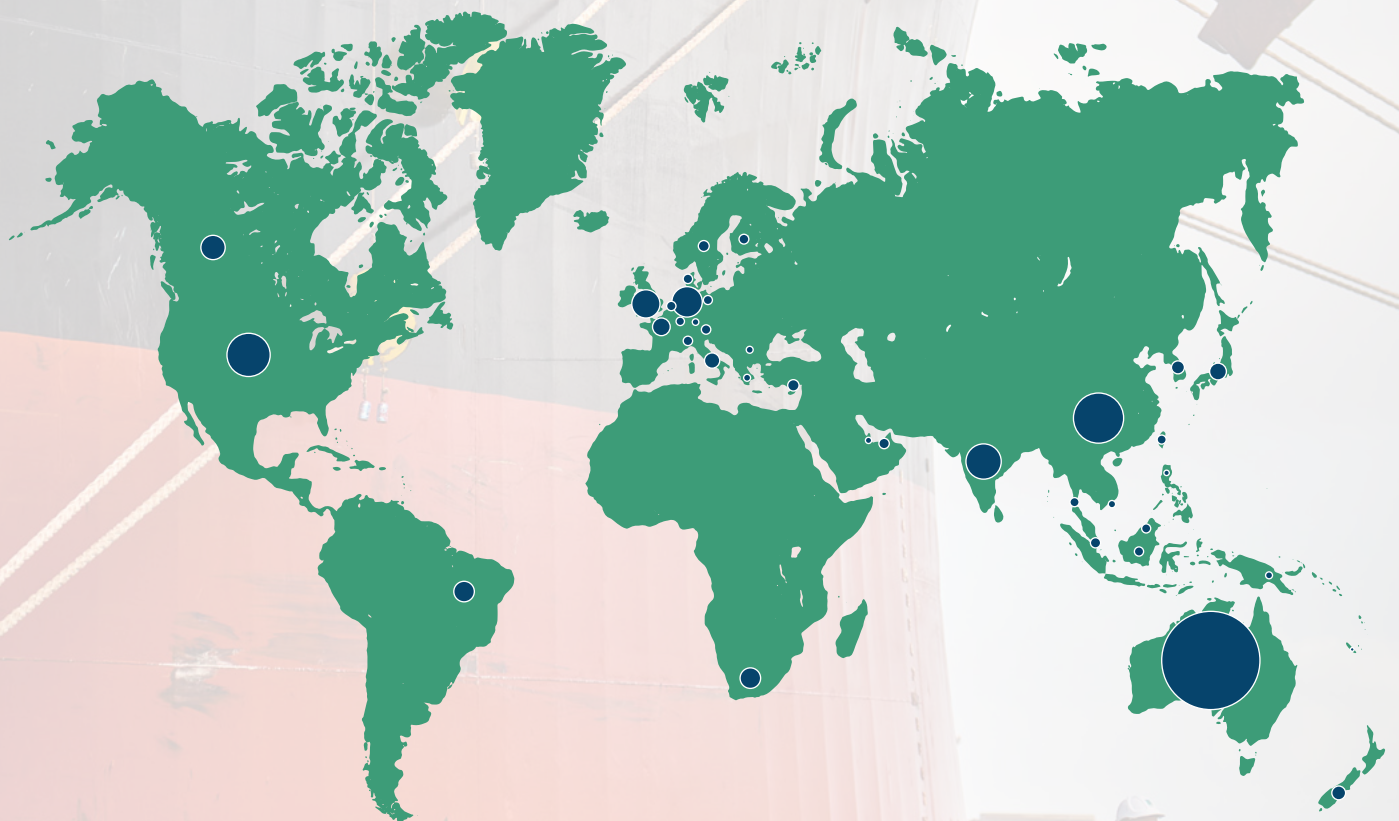
International Spend: 8.3%

SUMMARY: we spent \$1.3 Billion overall, with 91.7% spent in Australia.



While a supplier's country of domicile provides some insight, it does not always reveal the full picture of their operations. To gain a deeper understanding of our supply chain, we leverage responses from our modern slavery questionnaire. This allows us to map the geographic footprint where our suppliers actually operate, as illustrated below:

Figure 3: Geographic Footprint of Supplier Operations



Our procurement categories include the following services and products:

1

Processing

Labour hire, grinding media, reagents



2

Mining

Explosives, open cut and drill and blast mining contractors, earthmoving contractors



3

Delivery

Shipping, haulage, port, and stevedoring services



4

Exploration

Drilling contractors, drilling equipment and consumables



5

Major Projects

Engineering, construction and earthmoving contractors, and plant and equipment



6

Site Support Services

Power supply, information technology equipment, accommodation management services, inbound freight services, fuel supply, PPE, equipment and services



7

Head Office Support Services

Telecommunications, ICT hardware and software, office cleaning and maintenance, catering, legal and accounting services, insurance, utilities, waste collection services, corporate merchandise, printing.



Modern Slavery Risks

Operations

Modern slavery risks exist globally, with prevalence influenced by factors like inequality, weak governance and inadequate worker protections. While Australia generally poses a lower risk due to its robust legal framework, vigilance remains crucial.

We actively mitigate potential risks through various measures:

- Industry Benchmarking:**
 We participate in annual salary surveys, ensuring our employee compensation aligns with industry standards, exceeding minimum award rates whenever applicable.
- Ethical Accommodation:**
 We offer diverse housing options, including community houses and camp facilities. All accommodations guarantee freedom of movement and meet regulatory requirements. Our camp is currently expanding to

accommodate workforce growth.

- Preventing Child Labor:**
 Operating in a low-risk jurisdiction, we strictly adhere to industrial relations laws and our Minimum Working Age Standard. During the reporting period, two individuals under 18 were employed, both in compliant roles (apprentice electrician and administration trainee)¹. Given the low-risk environment and our commitment to legal compliance, we believe the risk of child labor, as defined by the International Labour Organisation, is negligible within our operations.

Based on our comprehensive assessment, we maintain a low risk profile regarding modern slavery within our operations. However, we remain committed to continuous improvement and maintaining vigilant practices to address any potential concerns.

Downstream Risks

While our direct operations pose a low risk of modern slavery, we acknowledge the potential for indirect involvement through

our supply chain. This could occur if downstream production companies, particularly those operating in higher-risk sectors like lithium-ion battery manufacturing in countries with a higher prevalence of modern slavery, are linked to our materials.

Spodumene concentrate, the source material for lithium, is used globally in various products, including lithium-ion batteries that power electric vehicles, electronics, and other technologies.

As a supplier of approximately 22 per cent of the global lithium market, there is a significant risk that what we mine and export overseas end up in products made with other inputs such as cobalt ore mined with child labour and manufactured in factories that may have workers in modern slavery. The table below is based on the U.S. Department of Labor's (USDOL) 2022 List of Goods Produced By Child Labor or Forced Labor and sets out the downstream risks associated with the production of lithium-ion batteries.

TVPRA input Good in Country of Production	Exploitation Type	Downstream Production	TVPRA Downstream Good	Downstream Goods at Risk
 Cobalt Ore	 CL		 Lithium-ion Batteries	Cell Phones Electric Cars Laptops Medical Implants Turbines Vacuums



Supply Chains

Like most companies operating within our sector in Australia, the most significant modern slavery risks are likely to exist in our supply chain. In applying the United Nations Guiding Principles on Business and Human Rights (UNGPs), we remain of the view that our main exposure to modern slavery is via our relationship with third parties, rather than any direct causal impacts or contributory actions of our business.

Forced labour, debt bondage, servitude, human trafficking and the worst forms of child labour are some of the main types of modern slavery risks that can exist in the global supply chains supporting the extractives industry. These risks become acute where:

- there is widespread utilisation of vulnerable worker groups such as itinerant workers, migrant workers,

1. Neither individual is under the WHS mines regulation 2022 (r634) minimum age in surface mining operations of 16 years.

CASE STUDY: Construction

The Greenbushes operations is in the process of expanding its footprint by 218 ha. This will facilitate the increase in production capacity to 1.9 Mtpa. Construction works commenced in 2022, with the majority of construction works to be completed in mid-2025.

The construction sector is recognised as carrying a high risk of modern slavery. Modern slavery risks in the sector exist both upstream and downstream.

Construction material produced in many countries is linked to forced labour or child labour. For example, the production of timber in six countries and the production of bricks in 21 countries appear in the 2022 List of Goods Produced by Child Labor or Forced Labor published by the US Department of Labour.

The sector also commonly relies on outsourcing of labour. The use of sub-contracting and labour hire companies for base-skilled workers to complete projects in the construction sector causes lack of oversight. This creates an environment which makes workers more vulnerable to unsafe working conditions and exploitative labour practices, such as debt bondage.

Considering these factors, our expansion activities may increase the risks of modern slavery via the provision of labour in construction services and materials in supply chains.

workers from minority ethnic groups and displaced workers;

- mines are located in jurisdictions that do not protect human rights;
- there are opaque contracting arrangements for the provision of sub-contracted labour resulting in decreased transparency;
- migrant workers are charged recruitment fees by agencies and/or have their original passports or other forms of ID retained, subjecting them to situations of debt bondage;
- there are short lead times and pricing pressures on contractors and subcontractors; and
- continuous geopolitical tensions result in increased risks for already vulnerable individuals seeking a better life but find themselves in situations of forced labour.

While we haven't identified instances of modern slavery directly linked to our operations, we recognise that some suppliers may have an elevated risk profile due to their industry or the raw materials they utilise.

Example: Geomembrane Liners:

Based on recent Modern Slavery Questionnaire (MSQ) responses, our supplier of geomembrane liners sources polyethylene from Thailand and Malaysia, which are considered higher-risk countries for modern slavery. Additionally, the supplier exhibited limited controls to mitigate risks in various areas, including modern slavery.

The MSQ process also identified potential risks with suppliers of:

- **Electrical products:** Manufactured in high-risk countries with potential links to modern slavery through natural rubber.
- **Metal containers, machinery, and parts:** Manufactured in high-risk countries with potential links to modern slavery through 3TG metals, copper, and steel components.

Our supply chain involves transportation and shipping of goods supplied to our Site and spodumene from the Site

to processing locations. Depending on the nature of the goods supplied, either the supplier or we take responsibility for the shipping or freight. The transportation of spodumene from our Site is organised by Windfield. We remain cognisant of the ongoing reports of worker exploitation in the global shipping industry. Closer to home, in a report published by the Australia Institute's Centre for Future Work titled *'Robbed at Sea'*, it found that:

- 70% of International Transport Workers Federation (ITF) inspections at Australian ports between 2011-2021 resulted in a determination of underpayment or non-payment of wage entitlements;
- between \$46 million to \$84 million per year in wages and other monetary entitlements are lost to international seafarers on ships visiting Australian ports;
- Australian Maritime Safety Authority ship inspection reports show that degrading working and living conditions and other forms of exploitation and abuse routinely take place in parallel with wage theft;
- the power imbalance faced by seafarers from low-cost labour markets, including those subjected to human trafficking, can result in Seafarer Employment Agreements (SEA) being entered into despite concerns about their treatment.

In terms of our support services, key modern slavery risks are likely to exist deep in the supply chains of the ICT hardware that we, and most other companies, procure by virtue of the manufacturing of hardware as well as the mining operations for raw materials from high risk countries such as the Democratic Republic of the Congo supplying cobalt used in lithium-ion batteries present in phones, tablets and computers. Airlines, hotels, catering and cleaning are industries considered a higher risk for modern slavery due to the prevalence of subcontracting arrangements leading to decreased supply chain transparency, labour intensive work coupled with low barriers to entry, workers from vulnerable backgrounds including migrant workers. PPE and corporate merchandise are also considered to have higher modern slavery risks for similar reasons.



Our Actions

Human Rights Impact Assessment & Human Rights Management Plan

We are committed to conducting our operations in a responsible and ethical manner, respecting human rights throughout our activities. To ensure this commitment extends to the proposed expansion of our Greenbushes operations, we undertook the following initiatives:

- **Human Rights Impact Assessment (HRIA):** We engaged external consultants to conduct a comprehensive HRIA, identifying potential human rights impacts on various stakeholders, including adjoining landowners, local communities, Indigenous peoples, internal stakeholders, and supply chain participants.
- **Human Rights Management Plan:** Based on the HRIA findings, we developed a Human Rights Management Plan outlining a framework for managing and monitoring potential human rights impacts throughout the project lifecycle.
- **Stakeholder Engagement:** In February 2023, we conducted targeted consultations with various rightsholders through drop-in sessions, open house meetings, focus groups, and interviews.

While concerns regarding modern slavery were not raised during the consultations, we appreciate the valuable feedback received from stakeholders, including:

- **Accommodation:** Concerns regarding the availability of housing for the increased workforce were identified. To address this, we are constructing a new accommodation facility (Maranup Ford Road Accommodation Village) with capacity for up to 1,000 workers.
- **Worker Fatigue:** Concerns were raised about potential fatigue driving after long shifts. We are committed to ensuring worker safety and well-being, and we will continue to explore and implement appropriate measures to address this concern.
- **Overtime Practices:** Stakeholders sought clarification on whether overtime is mandatory or optional for contractors. We will ensure clear communication and adherence to responsible labour practices regarding overtime work.

We remain committed to continuous engagement with stakeholders throughout the expansion process. By proactively identifying and addressing potential human rights concerns, we aim to ensure the project is conducted responsibly and ethically, respecting the rights of all individuals and communities involved.

Human Rights Governance

The Windfield Board of Directors (Board) continues to have ultimate responsibility for Windfield's management of human rights risks and opportunities, including the risks of modern slavery.

During the Reporting Period, the Board was supported by the Management Team. An Assurance and Governance Advisor was appointed in October 2023 to manage the MSQ process and the implementation of the Human Rights Management Plan.

Policies, Procedures and Training

Our approach to managing human rights and modern slavery risk is supported by a framework of policies and procedures, which specifically include modern slavery. With the appointment of our Assurance and Governance Advisor during the Reporting Period, we were able to achieve progress on a number of fronts. Importantly, we developed a MSQ procedure to formalise the processes of undertaking supplier due diligence for modern slavery risks. It outlines the steps involved when:

- requesting MSQ from new suppliers;
- requesting MSQ from existing suppliers;
- a supplier is exempt from the MSQ but still requires assessment; or
- a supplier who refuses to complete the MSQ.

The exercise of preparing a MSQ Procedure involved a review of the existing processes and identifying areas for improvement. In doing so, we identified the need to develop a short form supply chain survey more appropriate for our local small business suppliers.

We are committed to fostering ethical practices throughout our supply chain. To achieve this, we have developed a Supplier Code of Business Conduct and Ethics. This code outlines our minimum standards and expectations, including:

- **Upholding human rights:** Suppliers must uphold fundamental human rights throughout their operations and supply chains.
- **Combating modern slavery:** Suppliers are required to have adequate procedures in place to identify, prevent, mitigate, and account for modern slavery risks within their businesses.

Our Minimum Working Age Standard ensures the well-being of young individuals. This standard:

- Defines the minimum working age for all employees, contractors, trainees, and apprentices on our Site.
- Prohibits anyone under the age of 15 from working on our premises.
- Incorporates International Labour Organisation (ILO) criteria on hazardous work for additional protection.

We recognise the importance of education in addressing modern slavery. During the reporting period, we took the following steps:

- **Procurement-focused training:** We provided modern slavery training specifically tailored to our procurement personnel, delivered by external experts.

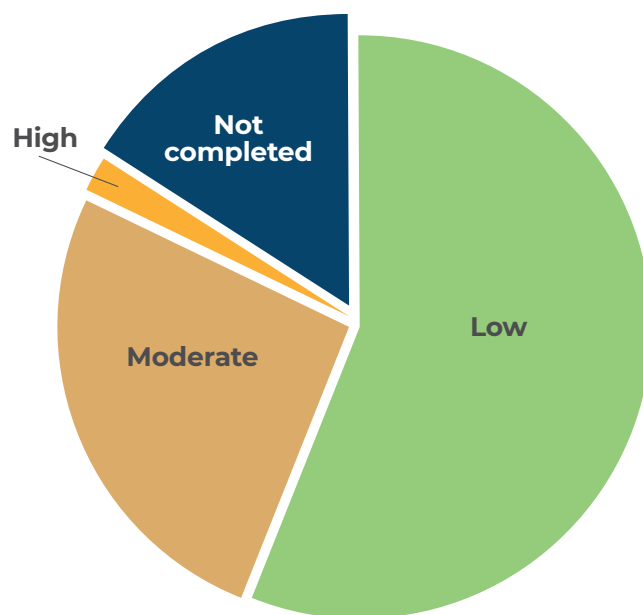
- **Company-wide awareness campaign:** We launched a modern slavery awareness training module for all employees, with over half of our workforce completing it by the end of the reporting period. We will continue monitoring and encouraging completion throughout the next year.

Supply Chain Due Diligence

As at the end of the Reporting Period, approximately 800 suppliers completed the MSQ. The resulting average modern slavery risk rating for completed MSQs remains low.

- The bulk of the suppliers rated low risk in the MSQ stated that they have operations solely in Australia, did not use any category of vulnerable workers and had a number of policies, procedures and processes in place.
- The suppliers with a medium risk rating tend to be suppliers with operations in higher risk locations and/or operating in higher risk sectors for modern slavery risks. The risks may, however, be mitigated by the presence of some policies and procedures.
- Three suppliers received high potential risk ratings in our supply chain review due to the sourcing of high risk products from high risk countries and the utilisation of potentially vulnerable categories of workers. We continue to monitor their mitigation practices and will engage with them with knowledge sharing and training and audit their compliance with their internal controls as required.

An overview of the distribution of risk ratings are shown below:



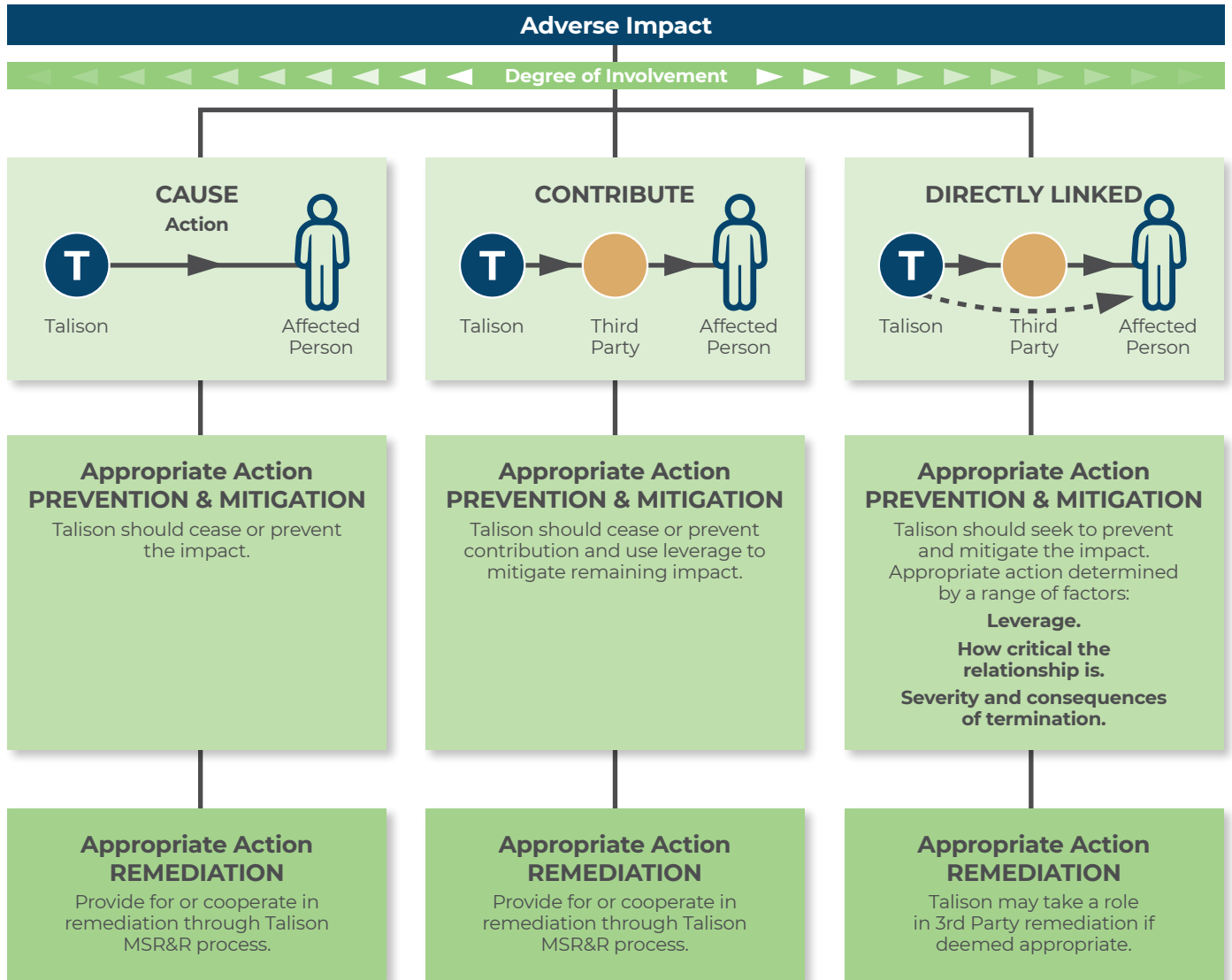
The MSQ results from the Reporting Period were reviewed by our external subject matter experts and the recommendations flowing from the MSQ are being considered by our Assurance and Governance Advisor with a view to conducting further due diligence.

Approach to Remediation

During the Reporting Period, we reviewed our Modern Slavery Response and Remedy Framework to align it with best practice. The Framework was developed having regard to resources including:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Due Diligence Guidance for Responsible Business Conduct
- International Labour Organisation (ILO) Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work

Windfield acknowledges our shared responsibility with suppliers to identify and support potential victims of modern slavery where our operations may have caused or contributed to adverse human rights impacts. The following chart outlines our response continuum:



Windfield provides a confidential whistle blower hotline accessible to all personnel, contractors, and vendors. This platform allows individuals to report suspected modern slavery concerns, along with other ethical and compliance issues.

The hotline is readily accessible through our website: <https://talison-lithium.safe2say.com.au/>

The landing page provides clear information about the reporting process and available support resources.

Approach to Assessing Effectiveness

Windfield is dedicated to continuous improvement in identifying and mitigating modern slavery risks across our operations and supply chains. We are proud of the progress we have made over the years, as evidenced by:

- **Deepening our understanding:** We have gained a stronger grasp of our connection to human rights as a business, fostering a more comprehensive approach.

- **Proactive mitigation:** We have implemented concrete measures to minimise the potential for our activities to contribute to adverse human rights impacts, including modern slavery.

As Greenbushes operations expand, we remain vigilant in addressing modern slavery risks throughout our operations and supply chains. Our commitment to continuous improvement involves several key steps:

- **Monitoring Implementation:** We will track the execution of our established policies and procedures to ensure their effectiveness in mitigating modern slavery risks (see below).

- **Stakeholder Engagement:** We will collaborate with stakeholders to identify areas for improvement and ensure our approach remains adaptable.
- **Adapting to Change:** We will proactively evaluate emerging risks and develop responsive measures to address them effectively.

Supply Chain		Operations
High level supply chain risk assessment of direct suppliers	2020	Human Rights Policy Statement
Modern slavery contract clauses for template agreements MSQ completed by 310 vendors	2021	Employee training on modern slavery
MSQ completed by 452 vendors Development of a procurement playbook for MS contract term negotiation	2022	Human Rights Standard Development of a remediation framework
Supplier Code of Business Conduct & Ethics, MSQ Procedure, Short Form MSQ Bespoke training for procurement MSQ completed by ~800 vendors	2023	Review of the Modern Slavery Response & Remedy Framework HRIA and HRMP Updated MS training for entire workforce
Supplier training for modern slavery	2024	On site induction to include modern slavery module Human Rights Management Plan reporting for the Board

Our Assurance and Governance Advisor will report quarterly to the Management Team on the Human Rights Management Plan and report to the Board annually on progress. The Board will continue to have ultimate responsibility for the management of human rights risks and opportunities, including the risks of modern slavery.

Other Information

Industry Collaboration

We continued to progress the process of seeking IRMA 50 verification for the Mine with the Initiative for Responsible Mining Assurance (IRMA). As at the end of the Reporting Period, we completed self-assessment of Principles 1 (Business Integrity), 2 (Planning and Managing for Positive Legacies) and 3 (Social Responsibility). Self-assessment of Principle 4 (Environmental Responsibility) remains in progress. On completion of Principle 4, we will be working with our auditors to schedule Stage 1 of the audit in 2024. IRMA requires mines to undergo independent third party audits and share results publicly to be able to make claims about reaching IRMA achievement levels.

Windfield continues to collaborate with the mining industry UN Global Compact group HHREC, to share insights and challenges. On 3 March 2023, representatives attended a presentation by the AusNCP, hosted by the HHREC, on the topic of 'The OECD Guidelines and the AusNCP'. A representative also attended another HHREC function later in the year with a presentation by the NSW Anti-slavery Commissioner.

A member of our shipping department is a member of the Bunbury Port Welfare Committee (Committee) which aims to promote seafarer wellbeing onboard and onshore. The Chair of the committee is a representative of the Mission to Seafarers and representatives includes the Australian Border Force, Australian Maritime Safety Authority, International Transport Workers Federation, Southern Ports and mining companies. The Seafarers Happiness Index for Q4 was released at the end of 2023 by the Mission to Seafarers. The report found a fall in positivity as "seafarers continue to feel overburdened, underappreciated, and disconnected. Punishing workloads persist, as crewing shortages and administrative burdens multiply while salaries stagnate. Vital connections to family and access to recreation remain constrained by what are seen as restrictive company policies, unreliable connectivity, and inadequate port welfare facilities." We continue to actively participate in the Committee to play our part in improving seafarer wellbeing.

Reporting Criteria and Correlating Page Numbers

Legislation	Reporting Criteria	Page Number
Modern Slavery Act 2018 (Cth)	Section 16 (a) Identify the reporting entity.	3
	Section 16 (b) Describe the reporting entity's structure, operations, and supply chains.	6-11
	Section 16 (c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.	12-13
	Section 16 (d) Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address the risks, including due diligence and remediation processes.	14-15
	Section 16 (e) Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	17
	Section 16 (f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls (ii) in the case of a reporting entity covered by a statement under section 14 - the entity giving the statement.	2
	Section 16 (g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	4-5, 7, 18



Aerial view of Greenbushes operations.



CORPORATE OFFICE

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