



**MODERN SLAVERY  
STATEMENT – CY2022  
IMAGE RESOURCES NL  
ABN: 57 063 977 579**

## ABOUT THIS STATEMENT

This Modern Slavery Statement (**MSS**) is made on behalf of Image Resources NL (ABN 57 063 977 579) and its wholly owned subsidiaries Craton Resources Pty Ltd (ACN 648 631 314), Titon Resources Pty Ltd (ACN 655 038 083), Titan-DR Resources Pty Ltd (ACN 657 802 750) and Titan-SR Resources Pty Ltd (ACN 657 896 314) (collectively **Image** or **the Company**).

### Reporting period

The reporting period for this MSS is 1 January 2022 through 31 December 2022 (**CY2022**). It is submitted in compliance with modern slavery reporting requirements under Australia's **Modern Slavery Act 2018 (Cth)**. This MSS includes progress on proposed actions outlined in the Company's CY2021 MSS, a new Modern Slavery Approach and actions proposed for CY2023.

### Approval

This statement has been endorsed by the Chief Executive Officer and approved by the Board of Directors of Image Resources on 30 May 2023.



**Patrick Mutz**

Managing Director & Chief Executive Officer

## INTRODUCTION

Since Image transitioned to an active mining company in December 2018, it has taken a proactive approach to meeting or exceeding its commitments in the areas of safety, environmental protection, and social engagement, and has adopted a continuous improvement approach through its policies, procedures, processes, and practices. The Company has been proactively engaged in environmental, social and governance (**ESG**) practices informally since 2019 and is currently engaged in the development of a formal ESG reporting framework which will be summarised in an inaugural annual ESG and Sustainability Report to be published in CY2023.

As a modern mining company in Australia, with a wide range of stakeholders, Image understands it has an ethical responsibility to proactively contribute to the sustainability of the communities in which we operate and to engage positively and influentially with other companies and stakeholders. This includes the effective management and mitigation of modern slavery risks throughout our operational sphere and supply chain.

Such an approach begins with effective governance including formal policies and procedures and a formal code of conduct which require Image's directors, officers, employees, and contractors to observe high standards of business conduct and ethics which in turn, serve to promote, honesty, integrity, respect and fairness.

Image also proactively seeks to comply with all applicable governmental laws, rules and regulations, corporate reporting and disclosures, accounting practices and controls and auditing practices relating to preventing fraud against shareholders or other stakeholders. To help ensure such practices are followed, the Company's Audit Committee has adopted a formal *Whistle-blower Policy* to provide a confidential and anonymous process which encourages employees to report any illegal or unethical activities for investigation.



## COMPANY OVERVIEW

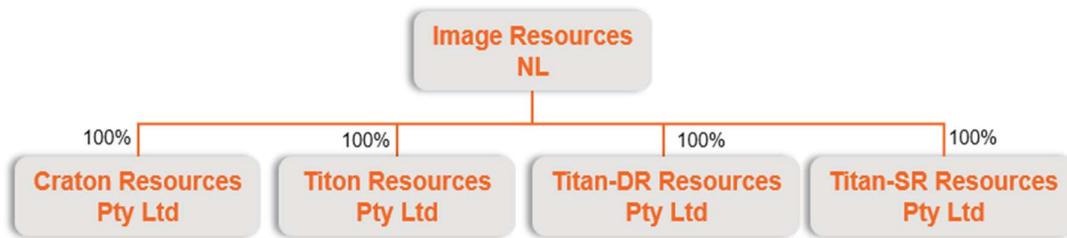
With headquarters based in West Perth, Western Australia, Image is an Australian public company listed on the Australian Securities Exchange (ASX: IMA). The Company's primary business is mining and processing mineral sands ore and producing a heavy mineral concentrate for export to global markets, with a focus on sales into China. All mining and processing operations are located in Western Australia.

In CY2022, the Company employed approximately 70 employees directly and upwards of 140 contractors and consultants throughout its mining and processing operations, development and exploration activities and corporate functions.

## COMPANY STRUCTURE

Image is owned by its shareholders and controlled by an independent board of directors and includes four wholly owned subsidiary companies as shown in **Figure 1**. Mining and processing operations during CY2022 were conducted directly under Image Resources NL. Future operations are planned to be operated under the various wholly owned subsidiaries.

Figure 1 – Company Structure





## 2022 ACTIONS AND ACHEIVEMENTS

Under its CY2021 MSS, the Company outlined several actions to be taken in CY2022 to assess and minimise the risks of modern slavery practices from its supply chain. Progress on those actions is outlined below.

Description of Measure	CY 2022 Status
<p>&gt;75% of Board Members and senior executives to receive modern slavery awareness training.</p>	
<p>Responsibility for annual reviews and reporting on modern slavery to be folded into the Board's corporate governance calendar (as opposed to forming a formal working group).</p>	
<p>100% of the Company's procurement employees and managers to receive modern slavery awareness and prevention training.</p>	
<p>&gt;50% of the Company's employees to receive modern slavery educational materials and/or awareness training.</p>	
<p>Three identified higher risk areas to be assessed to determine potential risks of modern slavery practices related to Tier 1 suppliers/contractors.</p> <ul style="list-style-type: none"> <li>• Computers and associated hardware</li> <li>• Uniforms and safety clothing</li> <li>• Cleaning services</li> </ul>	

 **100% Completed**
 **In progress**

All outstanding action items for CY2022 were carried over into CY2023.

Image is taking a company-wide approach to the management of its modern slavery risks, which starts with building awareness across our teams. Accordingly, for CY2022 much of the Company's focus was on modern slavery awareness training across various levels of the organisation. By providing this training to employees, we were able to build on our culture of ethical responsibility and equip employees with the tools and knowledge to help identify potential modern slavery risks.

In addition, we developed our first modern slavery self-assessment questionnaire for Tier 1 suppliers. This questionnaire was developed to understand the policies and practices of our suppliers relating to modern slavery, more specifically within the areas of workforce management, supply chain management and internal policies and training. Implementing this self-assessment questionnaire provides Image the opportunity to engage more meaningfully with our Tier 1 suppliers regarding the potential for their supply chain to harbour modern slavery practices.

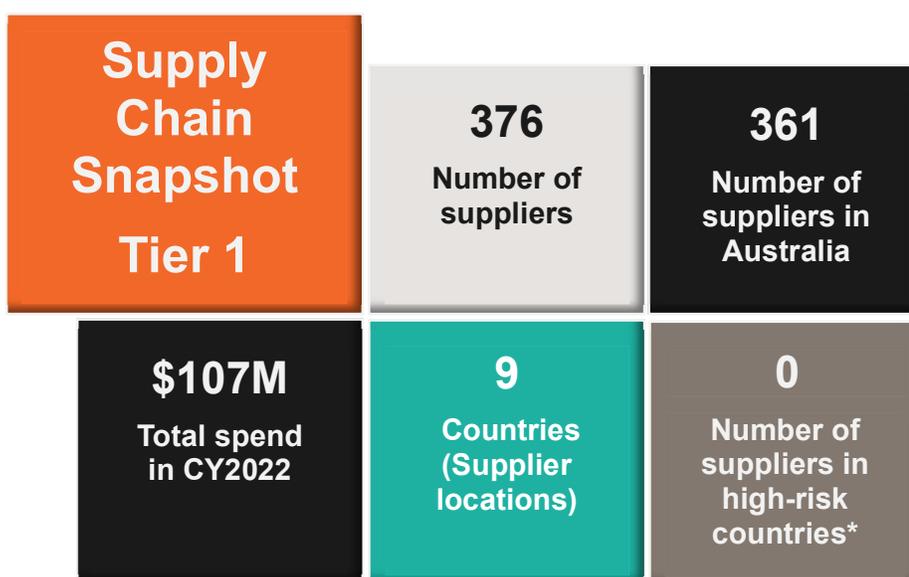
In addition to the actions outlined above, Image has also established a modern slavery register to track progress across these planned actions, and to catalogue the results of self-assessment questionnaires, to identify the requirement for remedial actions (if any) required to mitigate any potential modern slavery risks related to a supplier.

Through the delivery of modern slavery education and awareness training to our employees and through the development of the self-assessment questionnaires, Image has been able to better understand the methodology to appropriately assess the potential risks inherent in the Company’s supply chain. However, in recognition of the limitations of self-assessment questionnaires, the Company has moved to adopt a software driven supply chain audit approach (details below) designed to effectively reach beyond Tier 1 suppliers to help identify and assess exposure to any potential modern slavery risks in Image’s overall supply chain.

## OUR SUPPLY CHAIN

The following diagram provides an overview of Image’s Tier 1 suppliers:

Figure 3 – Tier 1 Supply Chain overview



\* Figure 3 - Analysis based on information obtained through the Global Slavery Index (Walk Free, 2023)

**Figure 3** illustrates that 96% of the Company’s Tier 1 suppliers are Australian based, a high proportion of which are located in Western Australia and are reputable companies that have been successfully operating in the mining sector for decades.

A breakdown of our major categories of goods and services that support our operations including geographic locations of suppliers, percentage of total spend and whether location countries are high-risk, is provided in **Table 1**. This data provides additional detail that corroborates that none of Image’s Tier 1 suppliers are located in high-risk countries.

## SUPPLY CHAIN RISKS

Given the relatively small scale of Image’s operations, and the locations of those operations (all located in Australia), Image is confident it **does not directly cause or contribute** to any modern slavery practices.

While we believe that the overall risks of Image’s Tier 1 supply chain harbouring modern slavery practices remain minimal, we acknowledge that our Tier 1 suppliers (Image’s Tier 2, Tier 3 etc. suppliers) may source goods and services from countries that are considered to be at high-risk of modern slavery practices.

Accordingly, understanding the potential risk that Image may unknowingly be **directly or indirectly linked** to modern slavery practices through activities of another entity we have a business relationship with, will continue to be the focus for the business through our next stages of supply chain assessment and proposed measurable actions. This includes (but is not limited to) adopting software solutions that are designed to drive modern slavery risk audits down the supply chain to lower tier suppliers.

**Table 1 - 2022 Tier 1 Supply Chain Goods and Services breakdown**

Supplier Category	% of spend	Location of Supplier	High Risk Country*
Capital Equipment	1.4%	Australia	✗
Corporate Goods and Services	1.2%	Australia UK, Hong Kong	✗
Computer Hardware/Software Goods and Services	0.3%	Australia USA, NZ	✗
Consultants	3.5%	Australia	✗
Contractors	62.2%	Australia	✗
Drilling & Exploration	2.6%	Australia	✗
International Shipping	15.2%	Singapore, Denmark, Germany	✗
Labour Hire	0.4%	Australia	✗
Mining Operations	5.0%	Australia	✗
Personal Protective Equipment	0.01%	Australia	✗
Transport	8.1%	Australia	✗
Vehicle & Fuel	0.1%	Australia	✗

\* Table 1 - Analysis based on information obtained through the Global Slavery Index (Walk Free, 2023)

## 2023 ACTIONS AND MEASURES OF EFFECTIVENESS

Image’s companywide approach to addressing modern slavery risks is being driven around **four** key themes which comprises Image’s formalised **Modern Slavery Approach**.

### IMAGE’S MODERN SLAVERY APPROACH



### APPLYING THE MODERN SLAVERY APPROACH - KEY ACTIONS FOR 2023

			
GOVERNANCE	EDUCATION AND AWARENESS	DATA DRIVEN ANALYSIS AND ACTION	REMEDIAL ACTION
 <p>Adherence to policies and procedures that support ethical human rights practices.</p> <p>Migrating supplier contracts to include modern slavery prevention commitments.</p> <p>Embedding modern slavery screening into tendering and procurement documents.</p>	 <p>Modern slavery module to be incorporated into on-line employee induction platform.</p> <p>100% of new and existing procurement staff to attend formal in-house modern slavery awareness training.</p>	 <p>Self-assessment questionnaires to be sent to Tier 1 high risk supplier categories identified in CY2021.</p> <p>Roll out modern slavery software platform to provide trackable audit trail to the Company’s supply chain lower tiers to drive better decision making, meaningful action plans and real time tracking of effectiveness.</p>	 <p>Provide support and education for identified high risk suppliers to assist in lowering their risk rating (which will be assessed and tracked through the implement of modern slavery software).</p>

This new approach will be underpinned and driven by a largely automated, systematic, structured approach focused on supply chain transparency and management beyond Tier 1 suppliers. This approach is proposed to be consistently applied through licensed and specialised commercially available software specific to modern slavery risk assessment and mitigation.

## CONSULTATION WITH OWNED/CONTROLLED ENTITIES

All the Company's owned and controlled entities are private entities set up to hold certain project assets as subsets of the Company's overall portfolio of mining tenements, licences and/or mining operations. All entities have common directors with the listed parent entity Image Resources NL. None of the other entities have any operational functions or employees. Procurement for materials or services for these entities is conducted by procurement employees of Image Resources NL.

## OTHER INFORMATION

Image Resources NL recognises its greatest strength is its employees. The Company values the contribution of its employees and strives to treat all its employees equitably and fairly.

One of Image's major areas of expenditure is labour costs, for both direct employment as well as indirect employment through Tier 1 suppliers (e.g., contractors and consultants). Given the Company operates exclusively in Western Australia within the mining industry as a listed public company, the risk of modern slavery practices within the Company's direct and indirect employment ranks is extremely low.

Image is an equal opportunity employer that strives to remunerate its employees commensurate with similar positions in the very competitive Australian mining industry. The Company reviews employee performance and salary levels on an annual (or more frequent) basis and maintains records regarding turnover and gender diversity, however, no aspirational goals have been established at this time due to the small total workforce and uncertain growth prospects of the Company.

Recruiting practices are guided by formal policies on diversity and employment equality and affirmative action, including indigenous employment opportunities. The diversity policy serves to prevent discrimination based on gender, age, nationality, race, religious beliefs, cultural background, sexuality, or physical ability. The equality and affirmative action policy serves to align with Western Australian law which makes it unlawful to discriminate on the grounds of sex, marital status, pregnancy, sexual orientation, family responsibility or family status, race, religion, political conviction, impairment, age, or gender history. It also serves to prevent the unlawful acts of sexual harassment and victimisation.