AMCI (WA) Pty Ltd

ACN 120 952 150

Modern Slavery Statement

2025

1. Introduction

This statement covers the activities of AMCI (WA) Pty Ltd (ACN 120 952 159) and its wholly owned entity AMCI (IO) Pty Ltd (ACN 123 253 485) (“**the Group**”) for the year ended 31 December 2025.

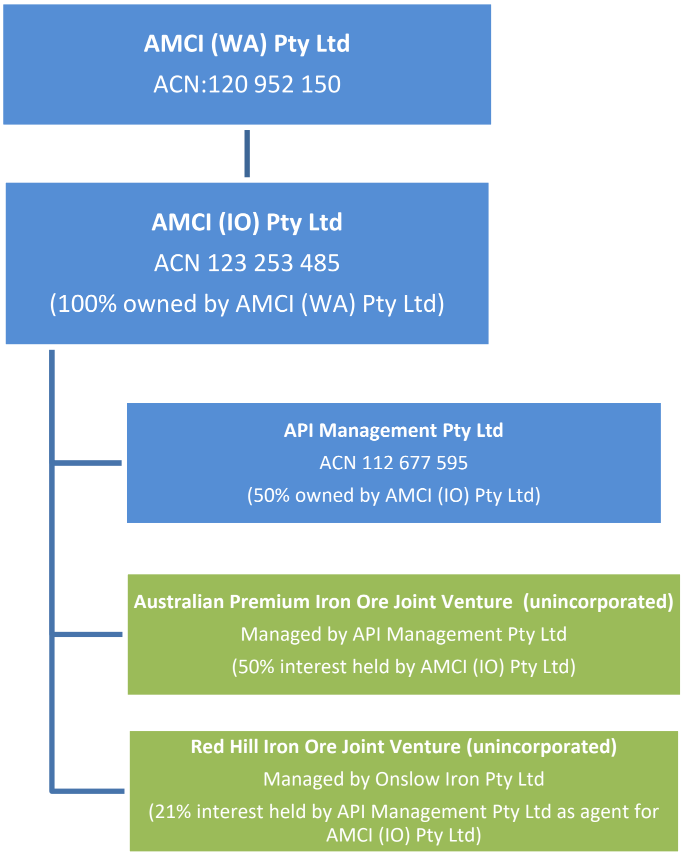
This is the Group’s second modern slavery statement.

As noted in the Group’s modern slavery statement for 2024, in 2024 the Group commissioned a review of its existing policies and procedures to ensure modern slavery risks were adequately identified and addressed. The Group has now completed the review and the actions and measures outlined below represent the outcomes of that review and the additional initiatives that have been developed by the Group to address modern slavery risks in its operations and supply chains in 2025.

2. Our Structure and Operations

AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd are companies incorporated in Australia with their registered office located at Level 8, 210 George Street, Sydney, Australia.

A simplified corporate structure chart of the AMCI (WA) group is provided below:



AMCI (WA) Pty Ltd is a holding company owning a 100% interest in AMCI (IO) Pty Ltd.

AMCI (IO) Pty Ltd is a joint venture partner in two unincorporated joint ventures engaged in iron ore mining activity in the Pilbara in Western Australia.

API Management Pty Ltd ("**APIM**"), which AMCI (IO) Pty Ltd jointly owns with Aquila Steel Pty Ltd), acts as the Manager of the Australian Premium Iron Ore Joint Venture ("**APIJV**"). The APIJV holds exploration tenements in the Pilbara region of Western Australia.

APIM holds an interest in the Red Hill Iron Ore Joint Venture (**"RHIOJV"**) as agent for AMCI (IO) Pty Ltd and Aquila Steel Pty Ltd. The RHIOJV is the owner of the Onslow Iron Ore project in the Pilbara region of Western Australia. The Onslow Iron Ore project's first ore on ship was at the end of May 2024.

3. Our supply chain

The Group's supply chains remain unchanged from what is stated in the Group's previous modern slavery statement. AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd do not have any employees. The directors of these companies have engaged contractors to perform various services on their behalf.

APIM is the manager of the APIJV. APIM employs some staff directly and also has several staff members seconded from Aquila Resources Pty Ltd (ACN 092 002 769). Aquila Steel Pty Ltd and Aquila Resources Pty Ltd are subsidiaries of the Baosteel group.

Onslow Iron Pty Ltd (ACN 649 012 395) is the manager and operator of the RHIOJV. Any staff engaged in the Red Hill Iron Ore joint venture operations are engaged by Onslow Iron Pty Ltd in its capacity as manager and not directly by the joint venture. Onslow Iron Pty Ltd is a subsidiary of Mineral Resources Limited.

AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd are not the manager or operator of either of the joint venture operations and therefore their supply chain is limited and consists of the engagement of a small number of Australian based contractors who are responsible for corporate compliance.

4. Risk of Modern Slavery in our operations

As indicated in the Group's previous statement, AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd consider their direct operations to be at low risk of modern slavery due to the nature of its investment activities in Australia and the fact they have no employees.

Whilst the Groups direct operational involvement is limited, we have identified that as a joint venture partner it may be at risk of indirectly contributing to modern slavery practices in Australia through the entities it engages as contractors and the entities who have been appointed to act as Manager for the joint ventures it holds interests in. These Contractors and Managers do engage staff to perform services on the Groups behalf.

5. Actions to assess and address risk

Although the Group does not have an operator or managerial role in its joint ventures, over the past 12 months, the Group has either implemented or is in the developmental stages of implementing the following initiatives designed to further improve the Group's processes for identifying and addressing the risks of modern slavery in the Group's operations and supply chains:

a) The drafting of APIM's first Modern Slavery Policy, which is in the process of being finalised for approval by APIM's Board and Management Committee,

b) The drafting of the Group's first Modern Slavery Policy (still in progress), which will be finalised and approved by the Group's Board following approval of the APIM policy,

c) The drafting of a Modern Slavery clause to be incorporated into the Group's existing and future services agreements which sets out the obligations for contractors engaged by the Group to take reasonable steps to identify, assess and address risks of Modern Slavery practices in the operations and supply chains used in the provision of the contractor's services,

d) The development (still in progress) of a self-assessment questionnaire for contractors to assess each contractor's compliance with the Modern Slavery clause included in all services agreements, and

e) Reviewing the Group's current supplier on-boarding process to include a request for policies and procedures that address Modern Slavery risks in the suppliers' procurement and labour recruitment processes.

Whilst APIM itself does not issue a Modern Slavery Statement, the company 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.

The contractors engaged by the Group directly have worked for the Group for many years and all senior experienced highly paid Australian professionals who are at low risk of being exploited.

6. Assessing the effectiveness of those Actions

As a non-operator and non-manager in its joint venture partnerships, the Group is not in a position to directly control the supply chains for those investments and somewhat 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. However, the Group does engage in informal oversight of the actions and processes its joint venture partners have in place to address modern slavery risks and 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, the Group has undertaken a review of the latest modern slavery statement of the RHIOJV Manager, 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.

The Group has also undertaken a review of the latest available Modern Slavery Statement of Aquila/Baosteel who provide a number of their employees to our jointly owned company APIM on secondment. We are continuing to work with Aquila to better understand their policies and procedures and risk management framework to identify and assess modern slavery. We have received assurances from Aquila that all staff seconded to APIM are based in Australia and are in compliance with Australian industrial relation standards.

In addition, going forward, Modern Slavery will be included as an agenda item on the APIJV & RHIOJV committee meetings with its joint venture partners, where the actions taken by all parties to achieve compliance will be discussed and confirmed.

No issues have been identified through the current review process. AMCI 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.

The Group appreciates that although it is a 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, the Group 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.

7. Consultation and Approval

In preparing this modern slavery statement, the Group consulted with the entities appointed as the Managers of its joint venture operations (through APIM) and reviewed their most recent published modern slavery statements.

This statement has been approved and endorsed by the board of directors of AMCI (WA) Pty Ltd and AMCI (IO) Pty Ltd.

Signed and approved on 26 June 2026 by:

Walker Woodson

Walker Woodson
Director