



## **2024 MODERN SLAVERY STATEMENT REPORT**

### **Reporting Entity**

Consolidated Minerals Pty Ltd

### **Principal Governing Body Approval**

This modern slavery statement was approved by the principal governing authority of Consolidated Minerals Pty Ltd.

This Modern Slavery Statement is signed by a responsible member of the Board of Consolidated Minerals Pty Ltd as defined by the Act.

### **Reporting Date and Period**

This report was published on and relates to the financial year ending 30 June 2024.

### **Introduction**

Consolidated Minerals Pty Ltd and its subsidiaries ("ConsMin" or "the Company") are committed to open, fair and transparent employment, procurement, logistics and supply chain functions.

The Company sources a range of goods and services through its global supply chain. It is recognised that there is a potential for modern slavery to exist in the form of:

- Slavery – where ownership is exercised over an individual.
- Forced labour – all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Debt bondage – work or service which is exacted from any person under the menace of any penalty and for which the said person has not volunteered.
- Human trafficking – arranging or facilitating the travel of another with a view to exploiting them.
- Child labour – whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery involve the deprivation of a person's liberty in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights. The Company is committed to the eradication of these circumstances wherever they may exist.

ConsMin seeks to prevent or mitigate any negative human rights impacts in connection with its operations or activities. ConsMin also provides safe and fair working conditions for all its employees and ensures that no child labour is utilised, in line with minimum age laws. The Company expects the same standards from its contractors, suppliers and stakeholders and expects that its suppliers will uphold the same standards throughout their own procurement and supply chain processes.

### **ConsMin's Structure, Operations and Supply Chains**

ConsMin is a wholly owned subsidiary of Ningxia Tianyuan Manganese Industry Co., a Chinese industrial conglomerate.

ConsMin owns and operates the Woodie Woodie Manganese Mining Operation in the Pilbara Region of Western Australia.

Our mining operations are largely undertaken by our subsidiary company, Pilbara Manganese Pty Ltd, over which ConsMin has operational control.

Our manganese product is primarily sold into the international market through our parent company's trading entity, Pilbara Trading Ltd (Jersey).

### **Risks of Modern Slavery Practices in the Operations and Supply Chains of ConsMin**

ConsMin's supply function, through our procurement and asset management teams, supports our business in sourcing the goods and services we require to operate.

The table below sets out the categories of goods and services we utilise in our operations.

<b>Category</b>	<b>Description</b>	<b>Total Spend</b>
<b>Services</b>	Building/facility maintenance services, construction services, engineering services, environmental services, fabrication, machinery and surface treatment services, facility operation services, geographical and geological services, health services, hospitality services, legal services, machinery, vehicle and equipment maintenance, mining services, professional services, oil and gas services, sales/ marketing services, security services, site services, technology and communication services, utilities, waste collection and disposal.	
<b>Operational</b>	parts and supplies Building/facility supplies, electrical, componentry, electrical consumables, electronic equipment, explosives supplies, gases, general industrial supplies, grinding equipment components, IT supplies, lifting and rigging equipment, machinery/vehicle components and parts, material handling equipment components, medical/health equipment and supplies, mineral processing consumables, mineral processing equipment components, office supplies, oils and lubricants, plant equipment components and parts, PPE and clothing, pump components and parts, raw materials, safety supplies, structural material and supplies, tools, warehouse/ logistics supplies.	
<b>Hire</b>	Labour hire, machinery and equipment hire.	
<b>Logistics and transport services</b>	Domestic freight, dry bulk haulage, international freight and material handling services.	
<b>Machinery, vehicles and equipment</b>	Buildings/facilities, material handling equipment, measuring and testing equipment, mineral processing equipment, mining/construction machinery, power generation, pumps and workshop machinery.	
<b>Site village supplies</b>	Beverages, food, tobacco products, catering supplies and amenities.	
<b>Travel and accommodation</b>	Flights, vehicle hire, hotels	

### Identifying Risks of Modern Slavery

A company's actions can directly cause human rights abuses, such as modern slavery (eg engaging



a supplier whose contract staff are subject to debt bondage). Despite ConsMin having a very low risk of directly engaging in conduct akin to modern slavery, we acknowledge that all responsible entities must exercise vigilance in their operations to ensure that we are not indirectly contributing to occurrences of modern slavery that may exist.

Theoretically, ConsMin's actions (or omissions) may contribute indirectly to modern slavery through our engagement of other businesses or through a third-party. This may result from the contractual arrangement we enter into with third parties. Examples might include a third party manufacturer engaging in modern slavery practices in a foreign jurisdiction in order to maximise profits.

Accordingly, all of our suppliers and service providers are required to undertake our "Modern Slavery Questionnaire" in order to assess the existence of any potential circumstances of concern. The responses to this questionnaire are escalated to our General Counsel should a circumstance of concern arise out of the answers provided.

### **Actions Taken by ConsMin including Due Diligence and Remediation Processes**

No circumstances of concern have arisen within our supply chain.

In terms of due diligence, we actively engage with our suppliers directly through our Modern Slavery Questionnaire and additionally through the implementation of various policies which are directed at ensuring we and all of our suppliers are good corporate citizens.

Relevant policies include:

- Modern Slavery Statement
- Our Values
- Code of Business Conduct
- Risk Committee Charter
- Procurement Policy
- Whistleblower Policy

### **Effectiveness of ConsMin's Modern Slavery Processes**

ConsMin is actively monitoring the above processes and procedures to identify any modern slavery risks in our business and supply chains.

ConsMin considers such workstreams and the development of responsive policies and reporting mechanisms to be an ongoing obligation in this developing area of governance.

In terms of near terms activities we are reviewing our suppliers' responses, implementing training for our procurement staff and engaging with our peers on best practices that may be applicable to our operations.

### **Other relevant information**

During FY2024, we actively consulted with our subsidiary entities to develop our policy and this statement. Additionally, we engaged with our suppliers on our responses and considered their respective supply chains to ascertain risk.

We are comfortable that our subsidiary companies and our direct suppliers are familiar with the principles giving rise to risks of modern slavery and have undertaken to update those subsidiaries and our suppliers with the outcomes of our ongoing endeavours to identify and mitigate modern slavery risks across our operation and supply chain.

Additionally, we have incorporated contractual warranties and obligations into our contracts and



standard agreements to further strengthen our commitment.

Through CY2025 we propose to strengthen our risk management processes and diligently engage with our suppliers on their compliance with our contractual warranties and due diligence requirements.

  
Shiyao Jin  
**Managing Director**  
**CONSOLIDATED MINERALS PTY LTD**