

Australian Modern Slavery Statement 2025

Tronox Limited

1 Introduction and identification of Reporting Entities

This Modern Slavery Statement is made in accordance with section 14 of the Australian *Modern Slavery Act 2018* (Cth) (**MSA**) for the reporting period 1 January 2024 to 31 December 2024.

It is a joint statement issued by and on behalf of the following entities, which have been determined as reporting entities under the MSA for the reporting period:

- Tronox Limited (ABN 91 153 348 111), the Australian parent company;
- Tronox Mining Australia Limited (ABN 60 009 247 858);
- Tronox Pigment Bunbury Ltd (ABN 50 008 683 627); and
- Tronox Management Pty Ltd (ABN 59 009 343 364),

(together, the **Reporting Entities**).

This Modern Slavery Statement describes steps taken by the Reporting Entities and entities owned or controlled by those Reporting Entities to mitigate the risk of modern slavery in the entities' operations and supply chain.

The Reporting Entities form the Australian contingent of the Tronox group of companies, whose ultimate parent company is Tronox Holdings plc.

2 The structure, operations and supply chain of the Reporting Entities

2.1 Overview of Tronox

Tronox is the world's leading integrated manufacturer of titanium dioxide pigment. Tronox operates titanium-bearing mineral sand mines and beneficiation and smelting operations in Australia and South Africa to produce feedstock materials that can be processed into titanium dioxide for pigment, as well as high-purity titanium chemicals, including titanium tetrachloride and Ultrafine© titanium dioxide. Our strategy is to be vertically integrated and produce enough feedstock to be as self-sufficient as possible in the production of titanium dioxide at our 9 TiO₂ pigment facilities located in the United States, Australia, Brazil, UK, France, the Netherlands, China and the Kingdom of Saudi Arabia. The mining, beneficiation and smelting of titanium-bearing mineral sands also creates meaningful quantities of co-products including zircon, pigment and the rare earth bearing mineral, monazite, that we also supply to customers around the world.

2.2 Corporate structure

Tronox Limited is an unlisted public company limited by shares, incorporated and domiciled in Australia. Its registered office is Lot 22 Mason Road Kwinana Beach Western Australia 6167. Tronox Limited is the Australian parent company of Tronox Management Pty Ltd, Tronox Mining Australia Limited and Tronox Pigment Bunbury Ltd, as well as other subsidiary companies.

Tronox's success is driven by a dedicated, diverse and highly skilled global workforce united by the vision, values and strategies of the Tronox values and a Code of Ethics and Business Conduct ("Code of Conduct") and its commitment to deliver industry-leading results in any operating environment.

2.3 Operations

The Reporting Entities' principal operations involve the mining of mineral sands and the beneficiation of those ores to produce feedstock materials that can be processed into titanium dioxide for pigment and the manufacturing of titanium dioxide. These activities are conducted in the following areas:

Cooljarloo Mine

**Brand Highway
P.O. Box 31, Dandaragan
Cataby 6507
Western Australia**

Tronox's "Northern Operations" derives its feedstock from the Cooljarloo Mine in the Mid-West region of Western Australia. At Cooljarloo, Tronox mines ore deposits using dredging techniques before running it through a concentrator to produce heavy mineral concentrate (**HMC**). HMC is transported by road to the Chandala Processing Plant. The Cooljarloo facilities began operation in 1989 and together with Chandala (see below) employ approximately 290 employees.

Chandala Processing Plant

**742 Brand Highway
Muchea 6501
Western Australia**

The Chandala Processing Plant includes a dry mill, a synthetic rutile plant and a residue management plant. Zircon, rutile and leucoxene are either bagged or sold in bulk. Ilmenite is further processed into synthetic rutile using reduction, aeration and acid leaching. The Chandala facilities began operation in 1989.

Kwinana Pigment Plant

**Lot 22 Mason Road
Kwinana Beach 6167
Western Australia**

Of the approximately 220,000 metric tons of synthetic rutile produced each year at the Tronox Chandala Processing site, a significant amount is sent to Tronox's Kwinana pigment plant to be converted through the chloride process into titanium dioxide. The Kwinana facilities began operation in August 1991 and have approximately 420 employees, including a sales team at Henderson.

Bunbury Plant

**869 Marriott Road
Kemerton Industrial Park
Western Australia**

**Old Coast Road
Australind 6233**

Western Australia

The Kemerton plant is in the Kemerton Industrial Park, 24 kms north of Bunbury in Western Australia. The plant occupies a 55-hectare site that it shares with satellite plants supplying raw materials such as chlorine, caustic soda, gaseous oxygen and nitrogen. The plant produces TiO₂ through the chloride process, which uses chlorine to react with titanium-bearing ores. Finishing of product is conducted at the nearby Australind plant. The sites employ approximately 280 employees.

Southern Operations

**Lot 962 Koombana Drive
North Shore
Bunbury 6230
Western Australia**

Tronox's mining and mineral separation operations include mines in the South West region of Western Australia and the Mineral Separation Plant (**MSP**) at North Shore Bunbury adjacent to the port. The MSP is important for the separation of mineral concentrate from the Murray Basin and Wonnerup mines. Tronox has been operating in WA's South-West since 1956. The operation employs approximately 120 employees.

Eastern Operations

**PO Box 444
Broken Hill 2880
New South Wales**

Dredge mining has been in operation at the Ginkgo mine near Pooncarie since December 2005 and came to the end of mine life in 2024. A new mine – Atlas - opened near Hatfield in 2022. The ore is initially concentrated at site and then transported to Broken Hill for further processing. The approximate number of employees at these sites and a project office at Mildura is 140.

2.4 Supply chain

The Reporting Entities' supply chain personnel are based in Western Australia, Victoria and New South Wales, with support from a global team as required. The following provides a high level overview of industry categories relevant to the supply chain.

- Capital
- Chemicals
- Engineering
- Energy
- Environmental
- Equipment Hire
- Exploration & Mining
- Facilities
- IT & Telecom
- Labour Hire
- Leases

- Logistics
- Maintenance Services
- MRO
- Packaging
- Professional Services
- Royalties, Native Title, Land
- Utilities
- Warehousing/Leasing

The majority of the Reporting Entities' suppliers are Australian entities, supplying products and services from Australia and other jurisdictions. For some projects, given the highly specialised nature of the services required in operations, subcontractors are approved before they can start work and nominate pre-approved vendors for consideration by contractors.

Specifically, the Reporting Entities' have over 3,500 active suppliers that support the Australian region. While goods and services are sourced from 32 countries around the globe, over 91 percent of suppliers are based in Australia.

The following table illustrates this in further detail:

Country of Origin	Percentage of Suppliers from Country of Origin
Australia	91.53%
United States	2.28%
China	1.29%
United Kingdom	0.88%
Singapore	0.58%
India	0.47%
Germany	0.44%
New Zealand	0.29%
Hong Kong	0.23%
South Africa	0.23%
Netherlands	0.20%
Canada	0.18%
Others (27 vendors)	1.40%

3 Risks of modern slavery practices and actions to address, including due diligence and remediation

3.1 In operations

The Reporting Entities' operational modern slavery risk is low. Their employees and contingent labour workforce are predominantly service providers located in Western Australia and New South Wales. The Reporting Entities are confident that, as a result of recruitment, remuneration and compliance programs, there is low risk that any of their employees are enslaved. Similarly the Reporting Entities' contingent labour workforce is supplied by reputable global and national agencies who are required to comply with domestic and international laws.

Employees are required to undertake regular training in the Code of Conduct. In addition, Tronox employees are required to certify upon commencement of employment with Tronox that they have read and understood the Code of Conduct. The Code of Conduct also provides that if a Tronox employee needs guidance on an ethical or legal question or has knowledge of a potential violation of the Code of Conduct, policies or procedures, he or she must seek advice from one or more of a list of resources or report it via a 24-hour "Speak Up" Hot Line. The same channels are open to third parties. All reports of alleged violations will be investigated. If the results of an investigation indicate that corrective action is required, Tronox will decide the appropriate steps to take, including discipline, up to and including termination of employment or, in the case of a third party, the business relationship. Tronox employees also have access to an Employee Assistance Program, a free service where they can anonymously seek advice/counsel/support on any concerns of a personal or work based nature.

3.2 In supply chains

In order to qualify as a supplier to Tronox, suppliers are assessed in accordance with a number of factors including environmental and safety standards and compliance. Tronox performs background checks on new suppliers and we will not hire suppliers with red flags related to modern slavery or trade embargos. Tronox undertakes a heightened due diligence scrutiny of suppliers in areas of the world, or activity, that carry higher risk. Our compliance procedures contemplate corrective action.

Tronox is committed to ensuring that slavery and human trafficking is not taking place in any form within Tronox's business or any part of its supply chain. In line with this Tronox has in place policies and procedures to ensure the deterrence of any such conduct including the Code of Conduct. Additionally, Tronox has established a specific Supplier Code of Conduct (**Supplier Code of Conduct**). Tronox expects our suppliers to adhere to both the Code of Conduct and Supplier Code of Conduct, which set out our expectations to ensure issues of human trafficking and slavery do not take place in its business or supply chains. Tronox is committed to complying with all applicable laws, rules, and regulations governing employment, immigration and labor relations, including child labor, working hours and fair wages, and expects each of its suppliers to act accordingly. The use of child labor by suppliers and representatives is prohibited.

The Supplier Code of Conduct is incorporated as part of Tronox's template supply contracts. Breach of contract, including breach of the Supplier Code of Conduct, allows Tronox to terminate the contract. The Supplier Code of Conduct sets forth the expectation that Tronox's suppliers shall protect the human rights of their employees, to treat them with dignity and respect, and shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labour. This includes a prohibition on the transportation, harbouring, abduction, fraud, or payments to any person having control over another person for purposes of exploitation.

As part of this commitment to prohibit human trafficking, suppliers may not engage in any of the following conduct:

- destroying, concealing or confiscating identity or immigration documents;
- using fraudulent recruiting tactics; or
- charging employees unreasonable recruitment fees or providing inadequate housing based upon local standards, laws and directives.

In addition, Tronox's template supply contracts require suppliers to comply with relevant obligations under the MSA including:

- to identify any risks of Modern Slavery in its operations and supply chains and those of any entities that the supplier owns or controls;
- to assess suppliers and subcontractors, and prospective suppliers and subcontractors, against identified risks; and
- to implement processes and procedures to identify, assess, address, manage, prevent and mitigate the risk of Modern Slavery arising, including due diligence and remediation processes.

Our key suppliers are asked to report on measures taken by them to address modern slavery risk.

Further, Tronox does not and will not get involved in the raw material sector connected to illegal or unlawful exploitation of commodities and resources that, directly or indirectly, finances or benefits armed groups in conflict areas. As a member of the Responsible Mining Initiative (RMI), we require all of our suppliers of conflict minerals to demonstrate that they have been approved by RMI so that we may comply with our obligation to submit to RMI a confidential report on the Conflict Minerals Reporting Template (CMRT).

4 Assessing and addressing the effectiveness of our actions

The Reporting Entities continue their efforts on understanding supply chain risk and educating key personnel, including those in the Supply function, in relation to modern slavery risk and are committed to ongoing review of our operations and supply chains to identify potential modern slavery risks and determine appropriate actions to address these risks.

On a contract by contract basis Tronox conducts due diligence according to risk as a means of assessing the effectiveness of those actions.

The effectiveness of our modern slavery training is measured through the evaluation of key supplier responses to our modern slavery requests as they are received and we continue to investigate and research our supply chains to better understand the supply chain back to the raw materials. In addition, over the coming years, Tronox intends to introduce a risk-based assessment program for suppliers in our key procurement areas, leveraging existing efforts in this area within Tronox where possible

Tronox monitors and reviews complaints raised to its Speak Up hotline service, as well as calls made to the Employee Assistance Program. In 2024 there were no grievances raised via either of these services in relation to modern slavery.

Tronox has not been required to undertake any remediation processes within the Reporting Period. However, should Tronox identify that it has caused or contributed to modern slavery, the actions considered would include:

- Cessation of action causing the harm;
- Use of leverage to mitigate any harm; and
- Remediation for those who have been impacted.

5 Process of consultation

This statement reflects the position of each of the Reporting Entities. This statement will be published on the internet on the Australian Government's Online Register for Modern Slavery Statements, as well as Tronox's global website at www.tronox.com.

This statement was approved by the board of directors of each of the Reporting Entities.

The Reporting Entities covered by this modern slavery statement, as well as their owned and controlled entities, all share at least one Director and the same Company Secretary who has responsibility for the drafting of this statement following consultation with all relevant stakeholders including the Legal, Supply, Human Resources and Compliance teams. A draft version of the statement was reviewed by all directors of those entities before being submitted for endorsement and approval, and a responsible member of Tronox has signed the statement on behalf of all of the Reporting Entities.

6 Other information

The Reporting Entities form part of the Tronox group whose culture is deeply rooted in ethics and compliance. On the Tronox global website comprehensive information is provided about the policies, principles and procedures that embody our ethics and compliance-oriented corporate culture. This information is made available so that all of our employees, suppliers and other key stakeholders can better understand how we translate ethics and governance values into our day-to-day operations.

Tronox believes strongly in the basic rights of its workers and contractors. These rights include health, safety and security, non-discrimination, and fair remuneration. Tronox embraces our responsibility to respect human rights across our global supply chain. We are a values-based organization with a long-standing commitment to improving the human capital of our employees, contractors and the individuals who live in the communities where we operate. Keeping our employees and contractors safe and developing their full human potential is central to our values.

- Tronox is a member of UN Global Compact and is committed to making its 10 principles—many of which are directly related to human and labor rights—part of the values, culture and day-to-day operations of our company.
- An important part of our commitment to human rights is ensuring that child labor, slavery or human trafficking are not taking place in any form within Tronox's business or any part of its supply chain. This commitment is encapsulated in our Modern Slavery and Human Trafficking Statement, as well as our Code of Conduct and Supplier Code of Conduct.
- We maintain a host of policies, practices and procedures designed to ensure that we respect human rights by fighting against discrimination based on race, nationality, gender, sexual orientation, age, ancestry, religion, or ethnicity. We actively encourage all of our employees to report any actual or suspected discrimination through our "Speak Up!" hotline.
- Guided by its values of responsibility, respect and relationship building, in the Reporting Period Tronox drafted its first Reconciliation Action Plan (RAP) to support its continuing nurturing of the relationships we hold with the Aboriginal communities where we operate. The RAP supports the values inherent in the prevention of modern slavery.

Some of the key governance and policy documents that support our commitment to human and labor rights include the following:

Code of Conduct

Supplier Code of Conduct

Freedom of Association Policy

Diversity and Inclusion Policy

Procurement and Governance Policy

Conflict Minerals Policy

Ethics, Compliance and Whistleblower Policy

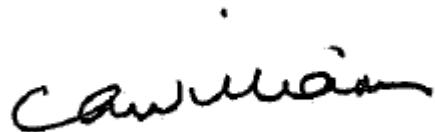
Anti-Money Laundering Policy

Anti Bribery Laws Policy

Ant-Harassment, Workplace Violence and Equal Opportunity Policy

Labor & Human Rights Report

Duly signed by:

A handwritten signature in black ink, appearing to read 'Cawillan', is written below the text 'Duly signed by:'. The signature is cursive and fluid.

Director Tronox Limited and Company Secretary of the other Related Entities