

# **MODERN SLAVERY STATEMENT**

## **2024**

**DELIVER  
SUSTAINABLE  
VALUE**









# CONTENTS

About this Statement ..... 4

Managing Director’s approval ..... 4

Approach to human rights and modern slavery ..... 6

Our structure, operations and supply chain..... 8

Assessing risks of modern slavery in our operations and supply chain ..... 14

Actions to address modern slavery risks ..... 16

Assessing the effectiveness of our actions ..... 17

Consultation with owned and controlled entities..... 18

Appendices ..... 19

# ABOUT THIS STATEMENT

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

This Modern Slavery Statement 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:

- Iluka Resources Limited (Iluka) (ACN 008 675 018), the Group's parent company
- Iluka Midwest Limited (ACN 088 763 666), which holds material parts of Iluka's Mid West Western Australian operations and the Iluka Group's US operations.

It describes steps taken by the reporting entities and entities owned or controlled by those entities to mitigate the risk of modern slavery in the entities' operations and supply chain.

This is Iluka's fifth Modern Slavery Statement made under the MSA.

In this Statement, the collective expressions "we", "us", "our", "ourselves", "the company", "the Group", "Iluka" and "the Iluka Group" are used where reference is made, in general, to the reporting entities and their respective subsidiaries. The use of those terms is for convenience only and used where no useful purpose is served by identifying any particular company or companies, and is not intended to convey how the Iluka Group is structured, managed or controlled. Iluka produces group-wide policies and procedures to ensure uniform practices across the Iluka Group. Certain Iluka Group operating subsidiaries have independent policies, procedures and management teams.

Unless stated otherwise, all data presented relates to the 2024 calendar year and parameters are reported for Iluka and Iluka Midwest Limited reporting entities.

Currency is expressed in Australian dollars (AUD) unless otherwise stated.

## MANAGING DIRECTOR'S APPROVAL

This Modern Slavery Statement was endorsed by Iluka's Executive and approved by the Board of Iluka Resources Limited on 02 May 2025 on behalf of the reporting entities.



**Tom O'Leary**

Managing Director of Iluka Resources Limited

02 May 2025

This Statement has been prepared to meet the mandatory reporting criteria in the Australian *Modern Slavery Act 2018 (Cth)*. The table below identifies where each criterion is addressed in this Statement.

Mandatory reporting criteria	Location of Iluka's response in this Statement
<b>Criterion 1</b> Identify the reporting entity covered by the Modern Slavery Statement	About this Statement, page 4
<b>Criterion 2</b> Describe the structure, operations and supply chain of the reporting entity	Our structure, operations and supply chain, page 8
<b>Criterion 3</b> Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities the reporting entity owns or controls	Risks of modern slavery in our operations and supply chain, page 14
<b>Criterion 4</b> 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	Our actions to address modern slavery risks, page 16
<b>Criterion 5</b> Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing our effectiveness of our actions, page 17
<b>Criterion 6</b> Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation with owned and controlled entities, page 18
<b>Criterion 7</b> Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Appendix: Iluka's key policies, standards and procedures, page 19

# APPROACH TO HUMAN RIGHTS AND MODERN SLAVERY

## HUMAN RIGHTS COMMITMENT

Iluka is committed to respecting human rights within its business and supply chain, and treating all people with dignity and respect.

Iluka's approach to respecting human rights is guided by its Code of Conduct and Human Rights Policy. Embedded in the People Policy, Indigenous Peoples Policy and the Health, Safety, Environment and Community Policy, Iluka's approach is to align its business activities and practices with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Iluka rejects any form of slavery, forced or child labour, and works to ensure that such practices are not present in its business or supply chain.

Iluka's supply chain is complex, spanning multiple sectors and countries. The company is committed to working with suppliers and other stakeholders, including communities associated with Iluka's operations and activities, to assess supply chain risks and support the identification and eradication of modern slavery.

## APPROACH TO MANAGING MODERN SLAVERY RISK

Iluka's approach is centred on three areas:

- **Governance:** Iluka believes that to succeed in business and human rights endeavours, strong governance is essential. This means that Iluka's policies and processes are clear, easy to follow, and have measurable outcomes. This drives accountability and ensures transparency in employees' actions. Wherever inconsistencies are found, Iluka addresses them in a systematic manner
- **Assessing our risk:** Iluka assesses risk at multiple levels to understand potential exposure points and address them accordingly. To build a meaningful analysis, Iluka conducts risk assessments on its direct employees and employment processes, and suppliers
- **Action:** Iluka's actions to mitigate modern slavery risks are designed to align the business with the UNGPs. The actions have been endorsed by Iluka's Executive and the Board of Iluka Resources Limited

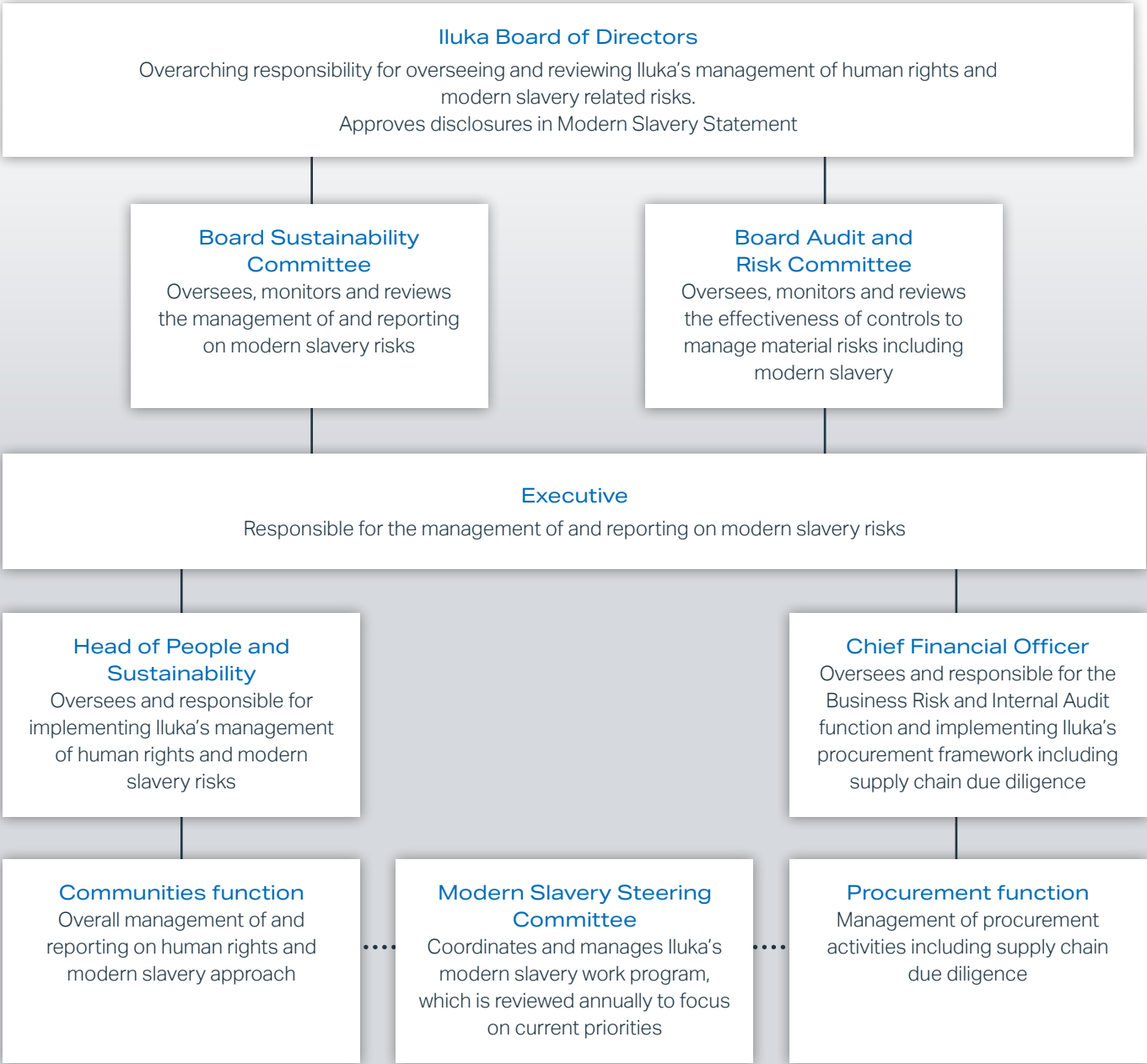


# GOVERNANCE FRAMEWORK

Iluka’s governance framework supports the ongoing assessment and management of modern slavery risks. It underpins the implementation of controls and actions to address potential modern slavery incidents.

Iluka maintains key policies, standards, procedures and processes that set out the company’s commitments and expectations in relation to respecting human rights, including modern slavery. These are detailed in the Appendix on page 19

## ILUKA'S GOVERNANCE FRAMEWORK TO ASSESS AND ADDRESS MODERN SLAVERY RISKS



# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## ABOUT ILUKA RESOURCES

Iluka Resources Limited (Iluka or the company) is a global critical minerals company with expertise in exploration, project development, mining, processing, marketing and rehabilitation.

The company's objective is to deliver sustainable value.

With more than 70 years' industry experience, Iluka is a leading producer of zircon and high-grade titanium feedstocks (rutile and synthetic rutile). Via the company's development of Australia's first fully-integrated rare earths refinery at Eneabba in Western Australia, Iluka is set to become a globally material supplier of separated rare earth oxides.

Iluka's products are used in an array of applications including technology, construction, medical, lifestyle, defence and industrial uses.

As the world moves towards a more sustainable future, Iluka's high-quality, Australian critical minerals products are in increasing demand.

Alongside the company's Australian production base and development pipeline, Iluka has a globally integrated marketing network. Exploration activities are conducted both within Australia and internationally and Iluka is actively engaged in the rehabilitation of previous activities in the United States and Australia.

Headquartered in Perth, Western Australia, Iluka is listed on the Australian Securities Exchange (ASX). Iluka holds a 20% stake in Deterra Royalties, the largest ASX-listed resources-focused royalty company.

The company and its subsidiaries employed more than 1,000 people during the reporting period, with the majority of employees based in Australia. Iluka's operations are supported by a contractor workforce of approximately 350 people and a project workforce of 330 people as at 31 December 2024.

Iluka Resources Limited is the Group's parent company. Its owned and controlled entities, including the other reporting entity listed on page 4, include those that hold operating mines and processing facilities, development projects, and exploration sites and provide various services to the Group globally.

Read more about Iluka's assets, owned and controlled entities, and investments in Iluka's 2024 Annual Report and at [www.iluka.com](http://www.iluka.com).





## PRODUCTS

### ZIRCON

Iluka is one of the world's largest producers of zircon. From premium-grade zircon to zircon-inconcentrate, Iluka delivers quality products to a wide range of customers around the world utilising its well-developed logistics and distribution capabilities. Main applications for Iluka's zircon include ceramics, refractory, foundry, and zirconium chemicals.

Zircon is a high-performing whitener, stable and non-reactive at high temperatures, and resistant to chemical attack, abrasion and corrosion. Zircon's key derivatives such as zirconia materials are highly resistant to thermal shock, highly biocompatible, extremely hard, and provide differentiated functional properties to many applications.

### TITANIUM DIOXIDE

Iluka is a leading producer of synthetic rutile, an upgraded, value-added form of the mineral ilmenite. The company also produces natural rutile. Collectively, these products are referred to as high-grade titanium dioxide feedstocks, due to their high titanium content. Primary uses are in the manufacturing of pigment, titanium metal and welding.

Titanium and titanium dioxide are favoured for their high strength to weight ratio, high melting point, corrosion and chemical resistance, biocompatibility, high refractive index and UV blocking abilities (absorption and reflection).

### RARE EARTHS

Iluka has established a significant position in rare earths elements. Rare earths are essential inputs to defence systems, electric and hybrid vehicles, robotics, renewable energy, consumer, industrial and agricultural applications.

The strong outlook for these applications is expected to drive growing market demand for Iluka's rare earth oxides, particularly neodymium, praseodymium, dysprosium and terbium.

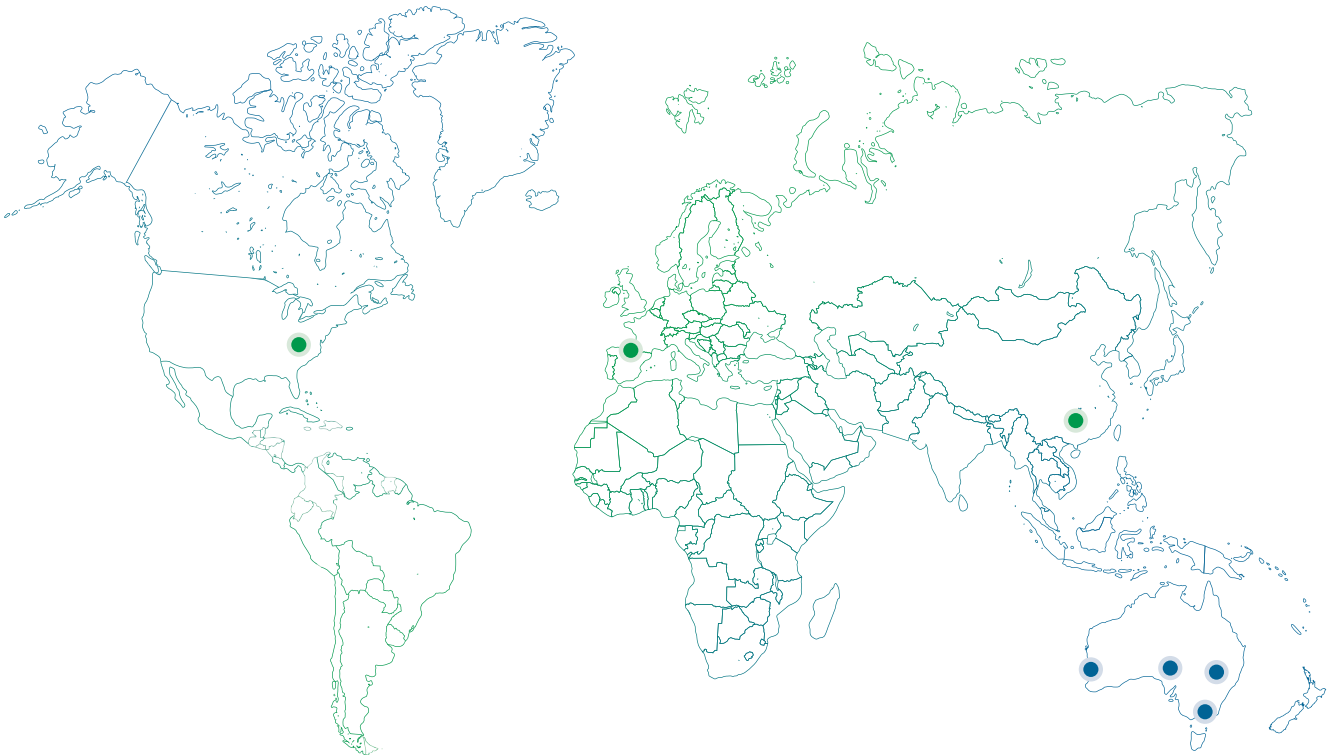
Global rare earth production is highly concentrated, which creates inherent risks. Iluka's Eneabba refinery in Western Australia is an important step in increasing the resilience of global rare earths supply chains.

### OTHER

Iluka recovers and markets products produced as part of its processing activities, including activated carbon, gypsum and iron concentrate.

# OUR LOCATIONS

Iluka's production is located exclusively in Australia. The company has a global marketing network and is conducting rehabilitation activities in Australia and at former mine sites in the United States.



## GLOBAL

### UNITED STATES

Marketing and distribution Rehabilitation

### EUROPE

Marketing and distribution

### ASIA

Marketing and distribution

## AUSTRALIA

### WESTERN AUSTRALIA

Narngulu processing  
Cataby mining and concentrating  
Capel synthetic rutile processing  
South West deposits (Tutunup)  
Corporate support centre  
Rehabilitation

### SOUTH AUSTRALIA

Jacynth-Ambrosia mining and concentrating  
Jacynth-Ambrosia satellite deposits (Atacama, Typhoon, Sonoran, Tripitaka)  
Rehabilitation Corporate support centre

### NEW SOUTH WALES

Balranald project  
Euston deposit

### VICTORIA

Wimmera project  
Hamilton processing (idle)  
Rehabilitation







# OUR SUPPLY CHAIN

Iluka’s supply chain spans 34 countries, with approximately 93% of the company’s spend local to our operations in Australia.











We procure a range of goods and services from multiple sectors to support exploration; project development; research and analysis; mining; processing; marketing and logistics; rehabilitation and closure; and corporate support activities.

Procurement is managed by a central function based in the Perth corporate office. The function is responsible for procurement governance and managing strategically important, high-risk or complex categories in accordance with Iluka’s Procurement Standard.

## SNAPSHOT OF ILUKA’S SUPPLIERS IN 2024

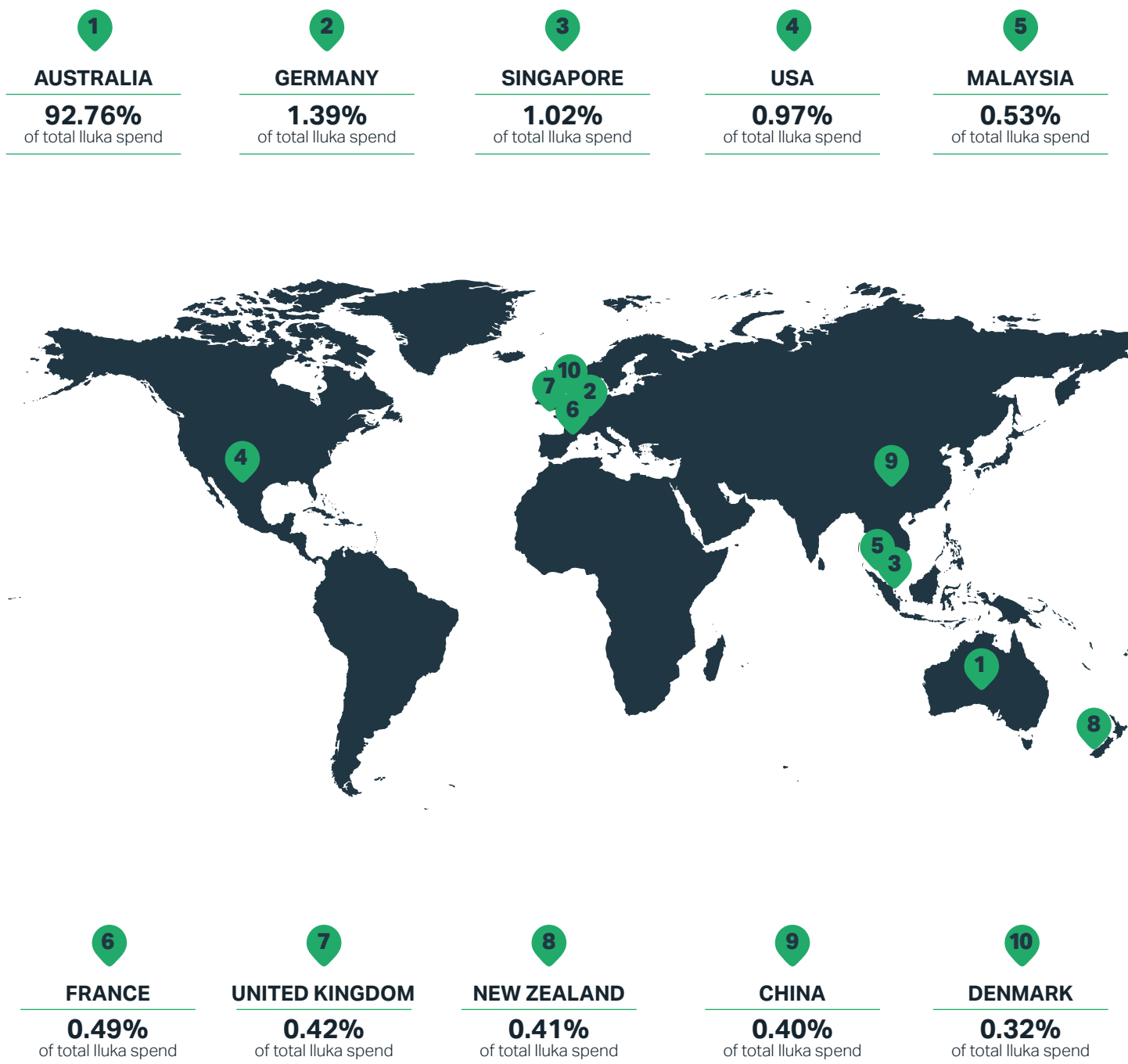
- Total invoiced spend AUD\$1.13B
- 2,143 active suppliers located in 34 countries were engaged
- 99.42% of total spend was from suppliers in low/medium risk countries (GSI<sup>1</sup> of 40 or below)
- 0.58% of total invoiced spend was from suppliers in high-risk countries (GSI of 50 or above)

## 2024 TOP 10 SPEND CATEGORIES BY % OF TOTAL ILUKA SPEND

	Professional services - All	16.6%		Site services - Earthworks	3.9%
	Contractor mining	14.4%		Government royalty	3.4%
	Bulk freight	10.2%		Contracted services	3.1%
	Site services - Other	8.5%		Bulk chemicals	3.1%
	Professional services - Project management	4.4%		Fuel - Diesel	2.5%

<sup>1</sup> [The Global Slavery Index | Walk Free](#)

## 2024 TOP 10 ILUKA SUPPLIER COUNTRIES BY TOTAL ILUKA SPEND



# ASSESSING RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

## ASSESSING RISK IN ILUKA'S OPERATIONS

Iluka understands that its operations and supply chain could potentially cause, contribute or be directly linked to modern slavery practices. As identified on page 8, Iluka's workforce is predominately based in Australia with 39 employees based in the United States, China, India and Spain. The Global Slavery Index ranks Australia as low risk for modern slavery practices, due to its robust labour laws and enforcement mechanisms, indicating a low risk of modern slavery in its direct operations.

The company's operations are supported by a contractor workforce of approximately 350 people and a project workforce of 330 people. We recognise that contractor workers can face a higher inherent risk to modern slavery type practices. Third-party contractors who use recruitment agencies or brokers to hire workers present higher modern slavery risks. Iluka seeks to manage these risks through its supplier due diligence and procurement processes described below.

In accordance with the Iluka Health Safety, Environment and Community Management System, the reporting and classification of hazards and incidents is set out in a Group guideline, which includes examples of modern slavery incidents that require internal reporting. This framework ensures visibility of any modern slavery occurrences that may be identified in connection with Iluka's business.

## ASSESSING RISK IN ILUKA'S SUPPLY CHAIN

Iluka's 2024 modern slavery supply chain risk analysis was conducted internally and is based on two key criteria: the country of origin of goods and the category of the commodity or service type. These criteria each quantify a specific risk component associated with a supplier which are then combined to calculate an overall risk score.

The evaluation of supplier data to identify modern slavery indicators utilised externally-developed tools and indices including the:

- Walk Free Global Slavery Index (GSI)
- US Department of Labour List of Goods Produced by Child Labour or Forced Labour

In 2024, the supply chain risk assessment indicates a predominantly low risk profile, with 99.42% of goods and services procured from countries with a low or medium risk score.

Iluka's purchasing included suppliers from five high-risk countries representing approximately 0.58% of its total spend. These high-risk countries are China, Hong Kong, Russian Federation, South Korea and Swaziland, where the main goods and services procured were professional and contracted services, and bulk and general freight and cartage services.



## 2024 TOP 10 HIGH-RISK CATEGORIES

High-risk category	Iluka purchasing material groups
Employment services	Advertisement fees, recruitment consultant fees Apprentice labour Labour hire - other functions Labour hire - IT roles and functions Labour hire - electrician and other electrical trades Labour hire - security and medical personnel Labour hire - mechanical trades Labour hire - operators, production support Labour hire - admin, corporate and office support Supplementary labour
Textile, clothing and footwear wholesaling	Helmets, visors, gloves, glasses Uniforms and clothing Clothing and personal protective equipment
Grocery, liquor and tobacco product wholesaling	Coffee, tea, paper cups, water, hydrolytes, food Foods and beverages for site consumption Field rations and food
Electrical equipment manufacturing	Isolation, lockout, tape, respirator Transformers Cable and conduit, saddles, joins, adaptors Coils, bushing, connectors Fuses, circuits, terminals, switches, plugs, sockets
Building cleaning, pest control and gardening services	Building maintenance, gardening, cleaning, camp management
Timber and hardware goods wholesaling	Construction and building materials
Other transport support services	Bulk freight and cartage General freight and cartage services
Fuel retailing	Fuel – diesel
Telecommunications services	Computer network charge Communications - telephone Communications - mobile Communications - video conferencing facilities Communications - other
Pharmaceutical and toiletry goods wholesaling	Soaps, paper towels, toilet paper

# ACTIONS TO ADDRESS MODERN SLAVERY RISKS

## APPROACH TO DUE DILIGENCE

Iluka expects all existing and new suppliers to meet or exceed the minimum standards outlined in Iluka's policies and Supplier Code of Conduct. Suppliers are expected to develop and implement policies consistent with Iluka's policies and Code and encourage their respective supply chains to do the same. Iluka's procurement contracts require suppliers to comply with its policies and guidelines.

Iluka aims to identify potential human rights issues associated with the company's activities including instances of modern slavery in Iluka's supply chain. Human rights due diligence is embedded in Iluka's procurement processes, including updated supplier selection and screening procedures. This comprises:

- Daily screening of the entire existing supplier database using a Dow Jones RiskCenter screening tool using data from Iluka's procurement system
- The requirement for all international suppliers to complete a modern slavery questionnaire, in addition to any national suppliers identified as potential high-risk
- For-cause supplier assessment conducted upon receipt of credible information justifying accelerated assessment

In relation to Iluka's purchasing from suppliers in high-risk countries, the company has, in addition to the due diligence procedure described above, in most cases established long-standing relationships with these suppliers and is familiar with their operations through regular engagement.

## REMEDIATION OF NON-CONFORMANCES

If a modern slavery incident is identified, Iluka will seek to mitigate the situation in line with Iluka's values, policies, standards and internal incident management systems, including the Modern Slavery Remediation Protocol.

If Iluka identifies that it has caused or contributed to a negative human rights impact such as modern slavery, the actions considered include:

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

## GRIEVANCE AND WHISTLEBLOWER MECHANISMS

Iluka's Social Performance Standard outlines the process for identifying any social impacts that Iluka's operations may cause or contribute to. All Iluka sites must have a locally-appropriate grievance mechanism, as described in Iluka's Grievance Management Procedure, which seeks to align with the UNGPs.

Iluka's Whistleblower Policy sets out how employees, suppliers, contractors, and the general public, can report concerns of potential or actual misconduct through the external independent whistle-blower service STOPline.

## **TRAINING AND CAPACITY BUILDING**

Employees in relevant roles gain awareness of human rights implications for the company by completing Iluka's mandatory human rights and modern slavery training module.

## **ENGAGEMENT AND COLLABORATION**

Iluka acknowledges the value and advantages of a collaborative effort in addressing common modern slavery risks.

Iluka actively participates in the Australia-based Human Rights Resource and Energy Collaborative, which provides a forum for the resources and energy sectors to network and share knowledge on respect for human rights, including implementation of the MSA. During 2024, Iluka continued to participate in the Collaborative via discussions and attendance at quarterly meetings.

# **ASSESSING THE EFFECTIVENESS OF OUR ACTIONS**

The Modern Slavery Steering Committee regularly reviews the effectiveness of Iluka's modern slavery risk based approach and implements actions as appropriate.

## **REVIEWS AND AUDITS**

A third-party review of Iluka's management of modern slavery risks within its workforce was completed in 2022. The review found that Iluka had adequately defined and managed modern slavery risk within its Australian workforce.

## **HUMAN RIGHTS AND MODERN SLAVERY TRAINING**

Iluka tracks the completion rate for internal mandatory human rights and modern slavery awareness training. In 2024, the completion rate for internal mandatory modern slavery training was approximately 88%, an increase from 2023.

## **GRIEVANCE AND WHISTLEBLOWER MECHANISMS**

Iluka monitors and reviews complaints raised in accordance with its Whistleblower Policy and locally-appropriate grievance mechanisms. In 2024, there were no grievances raised via the whistleblower service or other reporting avenues in relation to modern slavery.



# CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Reporting entities covered by this Statement all share the same Company Secretary, who was consulted in developing the Statement, including reviewing a draft version of the Statement. Consultation was also undertaken with owned and controlled entities through engagement at Company Secretary level.

The development of this Statement was led by members of Iluka's cross-functional Modern Slavery Steering Committee. Inputs were provided by the Communities, Sustainability, Procurement, Legal, Risk and People functions.

In finalising this Statement, Iluka's Executive Sustainability Committee has reviewed and endorsed the draft. The Board of Iluka Resources Limited, the parent entity of the Group, has approved this Statement, and a responsible member of Iluka has signed this Statement on behalf of Iluka and Iluka Midwest Limited. Refer to the Managing Director's approval on page 4.



# APPENDICES

## APPENDIX 1 – ILUKA'S KEY POLICIES, STANDARDS AND PROCEDURES

The following table lists key policies, standards and procedures that set out Iluka's commitments and expectations in relation to respecting human rights, including modern slavery. These apply across the Group.

Policy, standard or procedure
Code of Conduct*
Supplier Code of Conduct*
Anti-Bribery and Corruption Policy*
Diversity and Inclusion Policy*
Health, Safety, Environment and Community Policy*
Human Rights Policy*
Indigenous Peoples Policy*
People Policy*
Procurement Policy*
Risk Management Policy*
Whistleblower Policy*
Social Performance Standard
Training and Awareness Standard
Procurement Standard
Hazard, Incident Emergency Classification Guideline
Equal Employment Opportunity, Bullying and Harassment Procedure
Flexible Work Arrangements Procedure
Grievance Procedure
Recruitment Procedure
Social Performance Procedure
Iluka's Risk Appetite Statement
Modern Slavery Remediation Protocol
External independent whistleblower service STOPline
Iluka Resources Online Reporting   Externally Managed Disclosure Portal ( <a href="https://stoplinereport.com">stoplinereport.com</a> )

\*Available at [www.iluka.com](https://www.iluka.com)

