





## Acknowledgement

We acknowledge and recognise the deep cultural connections linking Indigenous people with their traditional Country, and we pay our respects to Elders past, present and emerging of the Country on which we operate.

## About this Statement

Aeris Resources Limited (ABN 30 147 131 977) (Aeris or the Company) is an Australian public company listed on the Australian Stock Exchange (ASX: AIS). The Company's registered address is Level 2, HQ South Tower, 520 Wickham Street, Fortitude Valley, Queensland 4006, Australia ([aerisresources.com.au](http://aerisresources.com.au)).

Modern Slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Practices that constitute Modern Slavery can include human trafficking, slavery related practises, severe discrimination, servitude, forced labour and debt bondage.

Our Modern Slavery Statement (Statement) has been published in accordance with the Australian Modern Slavery Act 2018 (Cth) (MSA or Act) for the financial year ended 30 June 2022. The Statement describes the specific reporting criteria required in s16(1) of the MSA and describes the steps taken by Aeris and its owned and controlled entities to assess and address Aeris' Modern Slavery risks.

Aeris has a diverse portfolio of operating mines and development assets in Australia. This is a joint statement made on behalf of Aeris and all entities within the Aeris Group Structure<sup>1</sup>.

## Modern Slavery Act Criteria

The Modern Slavery Statement covers all the mandatory reporting criteria set out in the Act:

Criteria	Location
Identify the Reporting Entity	Page 2
Our Structure, Operations and Supply Chain	Page 4 – 6
Our Approach to Managing Modern Slavery Risks	Page 7 - 9
Our Risks of Modern Slavery	Page 10 – 11
Assessing the Effectiveness of Our Actions	Page 12
Looking Ahead	Page 13

<sup>1</sup> Refer to Aeris' [2022 Annual Report](#) for a listing of all Aeris Group entities



# FY2022 highlights



Board Risk & Sustainability Committee was established for leadership and oversight of our Environmental, Social and Governance (ESG) Strategy and risks.

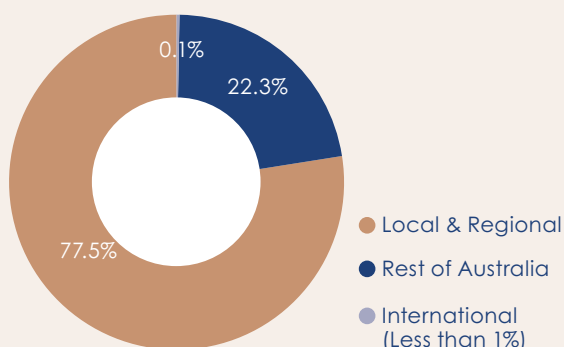


Engaged an external consultant to provide multi-tier visibility of our supply chain and better understanding of potential impact of Modern Slavery risks within our supply chain.



Updated Supplier Contract templates to include clauses relating to compliance with Modern Slavery obligations.

Total spend by region



Successfully rolled out Modern Slavery training to the Senior Leadership Team, Site Leadership Teams, Procurement Staff and Corporate Finance Team.

99.95%  
of supplier spend  
primarily from Tier 1  
Supplier Jurisdictions



Corporate Governance Strategy updated to include Anti-Bribery and Corruption Policy. Mandatory Workplace of Respect training rolled out for all existing and new staff members.



## Our Structure, Operations and Supply Chain

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### Our Structure and Operations (as at 30 June 2022)

Aeris is an Australian mid-tier mining and exploration company, with a growing portfolio of base metals and gold mining operations, development projects and exploration prospects.

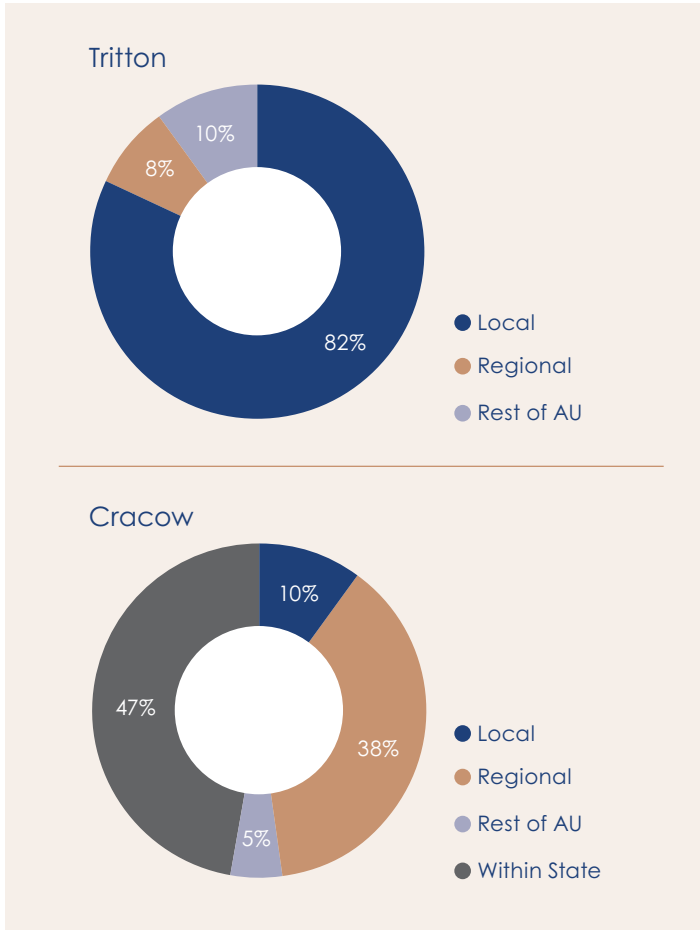
As at 30 June 2022, Aeris had two mining operations; the Tritton Copper Operations, located near the towns of Nyngan and Cobar in Central New South Wales and the Cracow Gold Operations located near the towns of Cracow and Theodore in Central Queensland. These operations are supported by the Head office located in Brisbane.

FY2022 was a transformational year for Aeris, culminating in the announcement on 28 April 2022 that the Company would acquire Round Oak Minerals Pty Limited (Round Oak). Through the acquisition of Round Oak, which was completed on 1 July 2022, we have successfully positioned ourselves as a competitive base and precious metals producer. We now have a copper-dominant, long term production profile with diversification through zinc and precious metals.

The Round Oak transaction has added two new, cash generative assets to the Aeris portfolio, namely the copper and zinc operation at Jaguar in Western Australia and the copper operation at Mt Colin in North West Queensland. The Round Oak portfolio also includes the advanced Stockman development project in regional Victoria and an exciting exploration portfolio focused around Jaguar, North West Queensland and Stockman.

As at 30 June 2022, we employed 717 people across our corporate office and the Tritton and Cracow mine sites. All employees are 100% based in Australia. We are part of the communities in which we operate in and we are involved in a number of initiatives focused on building skills and career opportunities within our local communities.

Our people are driven by and aligned with Aeris' Core Values. A large percentage of our operational employees are based locally or regionally in relation to the operations where they work:



We create value by actively managing our supply chain. The Company has taken additional steps to address any Modern Slavery concerns in its supply chain through working with socially responsible suppliers and contractors. By taking these actions we aim to demonstrate to our shareholders that our supplies and services have been ethically sourced and produced.

In FY2022, Tritton produced 18,581 copper tonnes at an AISC<sup>2</sup> of \$5.10/lb and Cracow produced 53,920 gold ounces at an AISC of \$1,911/oz. This contributed to total revenue of \$387 million and \$6 million Profit before Tax. The cash balance at the end of the year was \$138 million and net cashflow from operating activities of \$93 million.

Our strong pipeline of organic growth and exploration projects across the portfolio included a maiden Mineral Resource estimate for the Constellation deposit (Tritton); bringing the Budgerygar underground mine into production (Tritton); and exploration success at the Golden Plateau deposit (Cracow).

For further information on our financial results and operations, please refer to our 2022 Annual Report<sup>3</sup>.

<sup>2</sup> All-in Sustaining Cost  
<sup>3</sup> [2022 Annual Report](#)

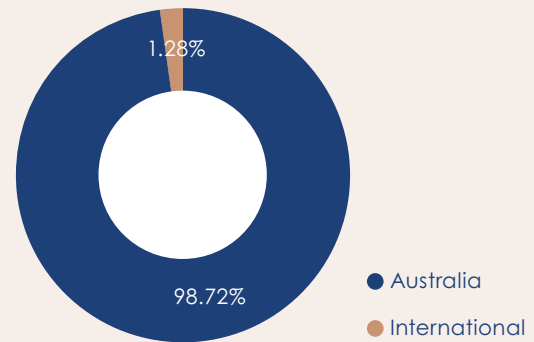
## Our Supply Chain

Aeris is committed to supporting local employment, local suppliers, and contractors in the regions in which we operate. Our buy local philosophy is designed to strengthen the community in instances where capability can meet our business requirements. We encourage larger contractors to develop local facilities and partnerships resulting in increased employment opportunities and skills development in the areas in which we operate.

In FY2022 over 99% of our supply chain inputs were sourced from within Australia, from 1,155 suppliers based in Australia and 15 suppliers based overseas, with a total spend of \$285 million. These results were similar to the previous financial year.

We recognise that although we have an overwhelming majority of our suppliers based within Australia, the interconnected supply chains and locations of manufacturing facilities around the world means many of our suppliers will also have international supply chains, including in areas of heightened incidences of Modern Slavery around the world, and that ongoing cooperation, checks and balances are required.

FY 2022 supplychain spend by location



## Key Goods and Services Procured



### Exploration

- Drilling services
- Geophysical survey services
- Laboratory services
- Contract labour



### Mining

- Explosives
- Fuel, lubricants, oils and greases
- Cement
- Mining fleet and spare parts
- Contract production drilling



### Processing

- Electricity supply
- Processing chemicals
- Mill consumables
- Electrical spares
- Contract labour



### Transport and logistics

- Road, rail and ocean freight services
- Storage shed facility services



### Support Services

- Accommodation services including catering
- Personal protective equipment / uniforms
- Facilities services – cleaning, cleaning chemicals and equipment



### Corporate & Other

- Professional services – legal, accounting, sustainability
- IT systems
- Office space / supplies / printing





Aeris has zero tolerance to all forms of Modern Slavery and is committed to continue to strengthen our approach to preventing Modern Slavery practices.

## Our Approach to Managing Modern Slavery Risks

### Corporate Governance

We are committed to delivering long term shareholder value by producing our commodities in a safe, cost effective and environmentally and socially responsible manner. These objectives extend to the inputs we require to produce our commodities, which requires us to actively manage our supply chain network. To ensure oversight of these objectives, we have a robust Corporate Governance framework.

Aeris complies with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition). Our full Corporate Governance Statement<sup>4</sup> is available on our website.

Our Corporate Governance framework is overseen by the Board of Directors via a Charter to provide strategic directive to the Leadership Team. The Leadership Team manages day to day operations in alignment with the Corporate Governance framework and Aeris' Core Values. In FY2022, the below listed key initiatives were undertaken to further strengthen our Corporate Governance framework:

- The Board Risk & Sustainability Committee was established to oversee risk and oversight of our ESG commitments ;
- Mandatory Workplace of Respect training for all employees was launched; and
- The Anti-Bribery and Corruption policy was introduced.

<sup>4</sup> [Aeris Corporate Governance](#)

Respect human rights and eliminate Modern Slavery.

## Policy Framework and Risk Management

The Directors, employees, contractors, and consultants employed to undertake work for and on behalf of Aeris and its subsidiaries are required to comply with the Company's Code of Conduct, and to behave in accordance with Aeris' core values on Safety, Performance, Ethics and Integrity and People.

The policy framework provides guidelines to all staff aimed at maintaining confidence in the integrity of the Company and embrace our responsibility, as a business entity, to respect human rights and eliminate Modern Slavery across our business activities and supply chain.

Safety  
Performance  
Ethics & Integrity  
People



Aeris  
Values



Code Of  
Conduct

Directors' Code of Conduct  
Corporate Code of Conduct  
Supplier Code of Conduct

### Policy Framework



### Workplace of Respect Policy

The Workplace of Respect Policy was introduced during the FY2022 and provides clear expectations of acceptable workplace behaviour and our responsibilities in relation to maintaining a workplace of respect and to contribute to a positive and inclusive culture, free from discrimination and harassment.

### Anti-bribery and Corruption Policy

The Anti-bribery and Corruption Policy was introduced during FY2022 to ensure compliance with all applicable anti-corruption laws and regulations, and to ensure that the Company conducts business in a socially responsible manner.



## Supplier Code of Conduct

Our suppliers play a key role in helping to deliver on our Modern Slavery strategy. Aeris expects our suppliers to uphold similar values and behaviours and has developed and implemented a Supplier Code of Conduct<sup>5</sup>. It outlines the expectations and minimum standards we place on our suppliers, including compliance with all applicable legislation in relation to employment practices and respecting and supporting human rights.

Suppliers are required to be accountable for their actions and are committed to conduct their business in alignment with Aeris' values and behaviours. A copy is made available to all new contractors or suppliers in Australia during the onboarding or engagement process and is also available on our website for existing suppliers.

Modern Slavery specific provisions are also included in our template procurement contracts and vendor trading terms for all new and renewed contracts. Through regular supplier relationship meetings and key performance indicator reporting, we monitor ongoing compliance and performance.



## Sustainability

Sustainability is built from the choices we make every day. The world we live in is constantly changing and in response to these changes, we are transforming the way we conduct our business.

We seek to operate in a sustainable manner that creates value now and into the future. As an Australian producer of minerals and metals, our contribution to a renewable future is significant. In FY2022, we have developed our Sustainability Strategy to focus on four key areas:

- Biodiversity and Land;
- Diversity and inclusion;
- Carbon and climate change; and
- Water efficiency and containment.

The Sustainability Report forms part of the Annual Report for FY 2022 and is in alignment with the United Nations Sustainable Development Goals (SDG's). Our FY2022 Annual Report is published on our website<sup>6</sup>.

<sup>5</sup> [Supplier Code of Conduct](#)

<sup>6</sup> <https://www.aerisresources.com.au>

# Our Risks of Modern Slavery

## Identification and Assessment of Modern Slavery Risks

Respecting the human rights of individuals in our supply chain and operations is important to our success in achieving our business objectives. This is directly aligned to our core values and further strengthened by our policy framework and focus areas identified under the Sustainability strategy. This demonstrates our on-going commitment in delivering long-term value to our shareholders in an ethical and sustainable manner.

Aeris has zero tolerance to all forms of Modern Slavery and is committed to continue to strengthen our approach in preventing Modern Slavery practices.

### Operational Risk

Aeris' operations are carried out entirely within Australia and all our employees and contractors are employed to work on Australian mining sites and our Brisbane head office.

We consider our operational risk as low, as the operations and workforce are 100% based within a Tier 1 jurisdiction (in Australia). Modern Slavery risks that relate to our operations are assessed through the health and safety of our employees, compliance with Aeris' Code of Conduct, policy framework and maintaining good employment conditions throughout our operations.

We maintain a robust framework of policies, systems, and processes to comply with our legal and contractual obligations. We promote mental and physical health and safety across all our operations and head office through various initiatives and programs. These initiatives and programs are designed to enhance awareness, understanding and support for the holistic wellbeing of our employees.

Committed to strengthening our approach.



## Supply Chain Risk

According to the 2018 Global Slavery Index, Australia is ranked within the top 10 countries for the lowest prevalence of Modern Slavery. However, notwithstanding the low prevalence of Modern Slavery within Australia, we acknowledge the potential risk of Modern Slavery deep within the supply chains.

We recognise that our Australian suppliers (99% of supplier spend) provide us with goods and services across various categories that may have inputs to their supply chains sourced from potential high risk areas.

We have engaged an external consultant, who is a subject matter expert on Modern Slavery risk and compliance with the MSA. The consultant has provided us with visibility on embedded risks of Modern Slavery across our entire supply chain.

Our risk assessment of our Tier 1 suppliers includes an in-depth analysis of supplier country and industry, in which they operate, to identify areas of greatest risks in our portfolio. The process includes:



identifying high risk suppliers;



deep dive into our high-risk suppliers and mapping their supply chain up to Tier 10; and



working towards automating and managing the Suppliers Self-Assessment Questionnaire (SAQ).

It is noted that our exposure to Modern Slavery risk is low across our existing suppliers.

We manage our supply chain risks through robust procurement processes from the time of opening a tender to supply goods or services until the completion of all contractual obligations. Our suppliers are provided with the Supplier Code of Conduct to set out our expectations around health and safety, human rights and labour, community engagement, environmental management, governance and compliance and sound business practices. All new and renewed supplier contracts have a Modern Slavery clause to set clear expectations while transacting with us.

## Dependency Risks

Dependency risk is the proportion of our spending on a given supplier over the total spending. We recognise that our spend dependency does not necessarily correlate to the revenue dependency of our supplier. We acknowledge that our influence will be greater for suppliers that have a high revenue dependency on our business.

After reviewing the breakdown of dollar value spend per supplier our dependency risks are considered to be low. We manage our exposure to dependency risks by establishing strong internal procurement processes.

In FY2022, we have not identified, recorded, or received any notifications of any incidents of cases of suspected or confirmed Modern Slavery or associated conduct in our supply chains and operations, over the current or prior reporting periods.





We have built an understanding of potential Modern Slavery risks in our operations and supply chain. An external consultant has also been engaged to support us in managing our commitments through detailed analysis of our supply chain spend. We have also undertaken several activities which form the basis of our Modern Slavery action plan and risk management. These are:

## Assessing the Effectiveness of Our Actions

### **Board Risk and Sustainability Committee:**

The Committee was established to provide an oversight of our risks and ESG commitments.

### **Modern Slavery Awareness Through Training:**

Mandatory compliance to the Workplace of Respect policy was rolled out to all employees for educating and setting clear expectations of acceptable workplace behaviour and our responsibilities in maintaining a safe work environment. Furthermore, an Anti-bribery and Corruption Policy was introduced to emphasise zero tolerance towards bribery and corruption. Both policies were endorsed by the Board.

### **Review of Procurement Process:**

We are undertaking a review of our Vendor Management System that will support the growth in our operations. A suitable system will assist us in improving the supplier assessment (including exposure of Modern Slavery risks) at the prequalification stage and our engagement with the supplier at the onboarding stage to ensure all Aeris' policies are appropriately communicated to them. This system is also expected to support on-going engagement with the suppliers during the contract period.

### **Engagement of Subject Matter Expert:**

To support our commitment to on-going improvement in identifying and measurement of Modern Slavery risks, an external consultant was engaged. The consultant has helped us in identifying our highest spend by supplier and category of spend against Modern Slavery risks indicators. This enables us to focus on high risk suppliers. The review will be extended to supplier surveys in the next reporting period for identified high risk suppliers. This will strengthen our relationships with our key suppliers and help us understand and manage any operational and supply chain risks with respect to Modern Slavery.

# Looking Ahead

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Aeris is committed to promote a culture of corporate compliance and expects its employees, contractors and suppliers to engage in highly ethical behaviour. We have taken steps to understand the Modern Slavery risks within our business and supply chain.

As we continue to grow, management will extend the review of Modern Slavery risks to the newly acquired operations and work towards rolling out its policies and initiatives. We will continue to provide Modern Slavery training to our employees.

Aeris is aware that it is pivotal to continue reinforcing the importance and the awareness of the risk of Modern Slavery in our business and in responding if any risks are identified.



## Key Actions Planned for FY2023:

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- 1 Review and improve our due diligence, risk management, policy framework, training and supplier engagement systems and processes with respect to the Modern Slavery risks;
  - 2 Reporting to the Board on identification, assessment, and monitoring of Modern Slavery risks in our business operations;
  - 3 Completion of review of the Vendor Management System and providing final recommendations to the Senior Leadership Team for approval;
  - 4 Work with the high priority suppliers to improve our understanding of any embedded risks of modern slavery within their supply chain;
  - 5 Roll out a Supplier Self-Assessment Questionnaire (SAQ) to high risk / high spend supplier category; and
  - 6 Review scoring of SAQs for a selected sample of high-risk suppliers, including a desk-based audit.
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**This Statement is  
authorised by the  
Aeris Board**

**Andre Labuschagne**  
Executive Chairman

16 December 2022

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[aerisresources.com.au](http://aerisresources.com.au)

