

## Modern Slavery Statement 2024

Contributing to a sustainable future.

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Lynas Rare Earths acknowledges the Traditional Owners of the lands on which we live, work and meet, across Australia.

We acknowledge and value Lynas' Aboriginal and Torres Strait Islander employees, partners and communities and pay respect to their Elders past and present.

# 1. Letter from the Chair of the Board and CEO

Lynas Rare Earths Limited (Lynas or the Group) is proud to present our fifth Modern Slavery Statement for the year ending 30 June 2024 (FY24). This Statement outlines our continued progress on actions to address the risks of modern slavery in our operations and with our supply chain partners.

Lynas is committed to protecting human rights and preventing modern slavery and this is evident in our policies and procedures. These include robust employee recruitment processes and supplier human rights and sustainability assessments and audits. Our cross-functional and cross-border Modern Slavery working group is focused on continuing to enhance our efforts to prevent modern slavery and its work continues in FY25.

This Statement was approved by the Board of Lynas Rare Earths Ltd on 19 December 2024 as the principal governing body of the Lynas Group which comprises Lynas Rare Earths Limited, Lynas Services Pty Ltd, Mt Weld Holdings Pty Ltd, Mt Weld Mining Pty Ltd, Lynas Kalgoorlie Pty Ltd, Lynas USA LLC, Lynas Malaysia Sdn Bhd, Lynas Africa Holdings Pty Ltd and Lynas Africa Limited.



**John Humphrey**  
Chair  
Lynas Rare Earths Ltd  
19 December 2024



**Amanda Lacaze**  
CEO & Managing Director  
Lynas Rare Earths Ltd  
19 December 2024

## 2. Introduction

*Caring for and respecting our people and our communities is at the heart of everything we do*

This Modern Slavery Statement has been prepared by the entity Lynas Rare Earths Limited ACN 009 066 648 (Lynas) in line with the Commonwealth Modern Slavery Act 2018 as amended and in force on 14 October 2024 and with reference to the UN Guiding Principles on Business and Human Rights.


Lynas is committed to protecting the human rights of all people with whom we have dealings, including our employees, our business partners and their families, and all people in the communities in which we operate.

We recognise that our responsibility to protect human rights and manage the risk of modern slavery applies to our own global operations as well as to our supply chains and we take this responsibility seriously. Modern slavery includes eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Lynas understands that modern slavery can occur in every industry and sector and we continue to assess and address modern slavery risks in our operations and supply chains.


### Our Values

Lynas aims to be the supplier of choice for our customers and a leader in sustainably produced rare earths. Our vision and values live through our people and the way we do business.




**Care**

We care for and respect each other, our communities and the environment. We make sure we all go home safe and well.



**Achievement**

We are resilient and committed. We overcome challenges to achieve our goals.




**Expertise**

We are driven to be the world's best in Rare Earths and to earn the respect of our customers.



**Diversity**

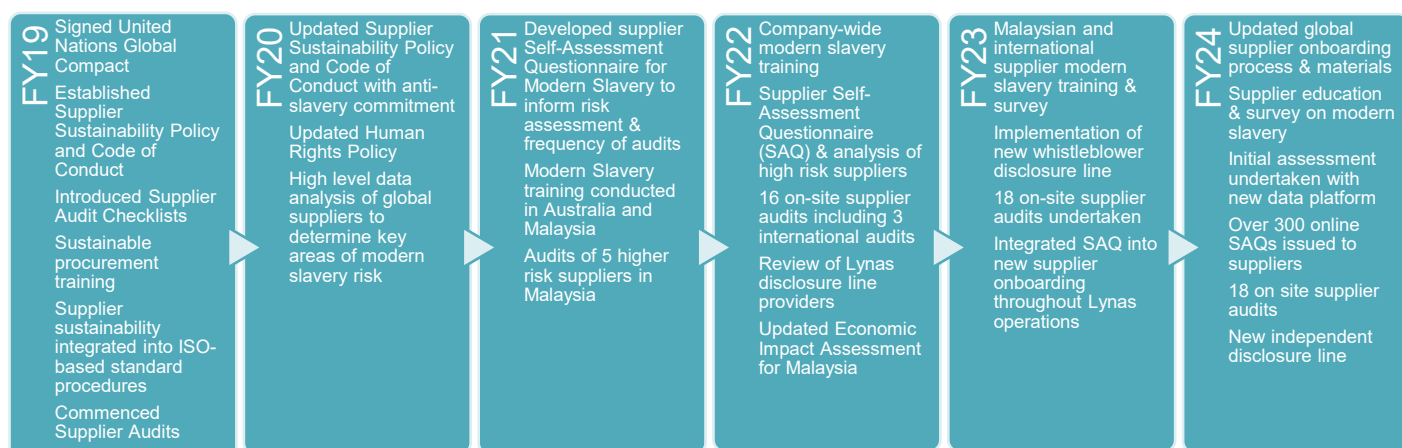
We are a multicultural company. We value and embrace diversity.



**Sustainability**

We are passionate about contributing to a sustainable future and green technologies.

## Our progress on modern slavery



## 3. Structure, Operations & Supply Chains

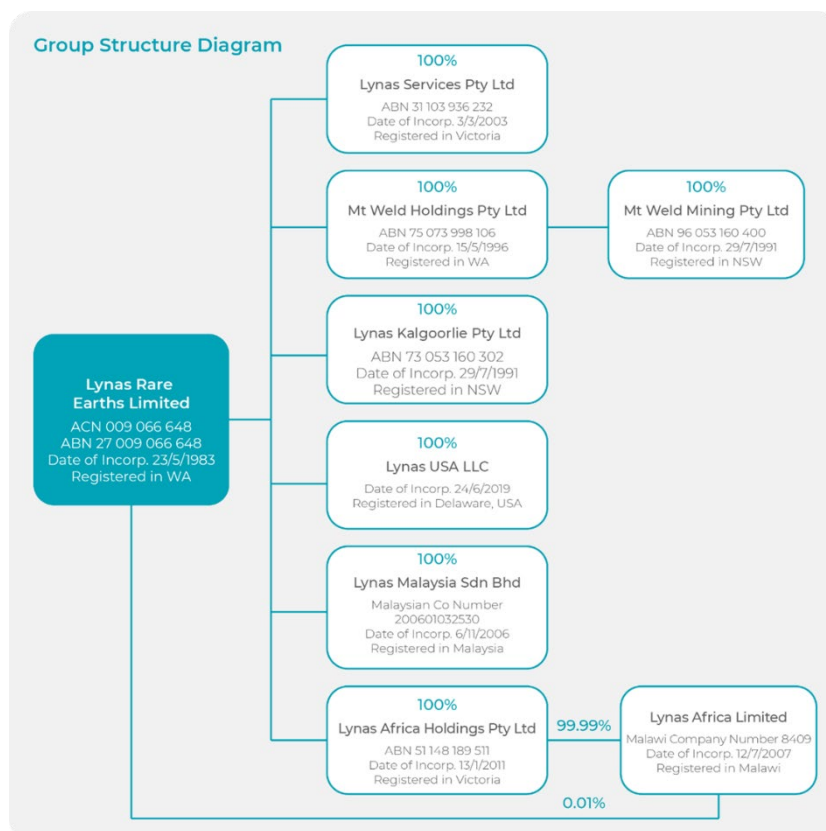
This section addresses mandatory criteria one and two of the Modern Slavery Act

### 3.1 Reporting Entity and Structure

*This Modern Slavery Statement has been prepared by Lynas Rare Earths Limited (Lynas). Lynas is a publicly listed company incorporated in Australia and listed on the Australian Securities Exchange (ASX). The Lynas registered office and headquarters is located in Perth, Western Australia.*

The Lynas Board of Directors, on recommendations from the Audit, Risk & ESG Committee, oversees compliance with the Lynas Human Rights Policy and the Group's response to modern slavery risks. At an executive level, the Lynas Leadership Team is responsible for modern slavery risks and actions to address them.

This statement has been prepared on behalf of Lynas Rare Earths Limited (Lynas) and its subsidiaries. Lynas' subsidiaries are all wholly owned and operate under the same leadership team and Board of Directors, as outlined in the following graphic.



All references to Lynas refer to Lynas Rare Earths Limited and its subsidiaries. Further comprehensive information on our Company, including detailed financial information and information on our environmental, social and governance performance, is in our 2024 Annual Report and 2024 ESG Report at: <https://lynasrareearths.com/investors-media/>

### 3.2 Our Operations

*Lynas is proud to be an ethical and responsible rare earths producer and the only scale producer of separated rare earth materials outside China.*

In the 2024 financial year (FY24), Lynas Rare Earths' operating sites were the Mt Weld mine near Laverton, Western Australia, the Lynas Malaysia advanced materials plant in Gebeng, Malaysia, and the corporate office in Perth, Western Australia. The new Kalgoorlie Rare Earths Processing Facility in WA was under commissioning during the year and achieved first production in the June quarter of FY24. Lynas' subsidiaries in Malawi and the United States of America (USA) had zero employees during the FY24 year.

At June 30, 2024, Lynas had 1117 employees across Malaysia and Australia. This includes geologists, engineers, metallurgists, tradespeople, process technicians and support functions on our operating sites as well as professional and administrative functions at our offices in Perth, Western Australia and Kuala Lumpur, Malaysia.

Employees	FY24
Lynas Total employees	1117
<b>Australia</b>	<b>292</b>
Australian nationals	228 (78%)
<b>Malaysia</b>	<b>825</b>
Malaysian nationals	814 (99%)
<b>United States</b>	0

In FY24, our business included the following activities:

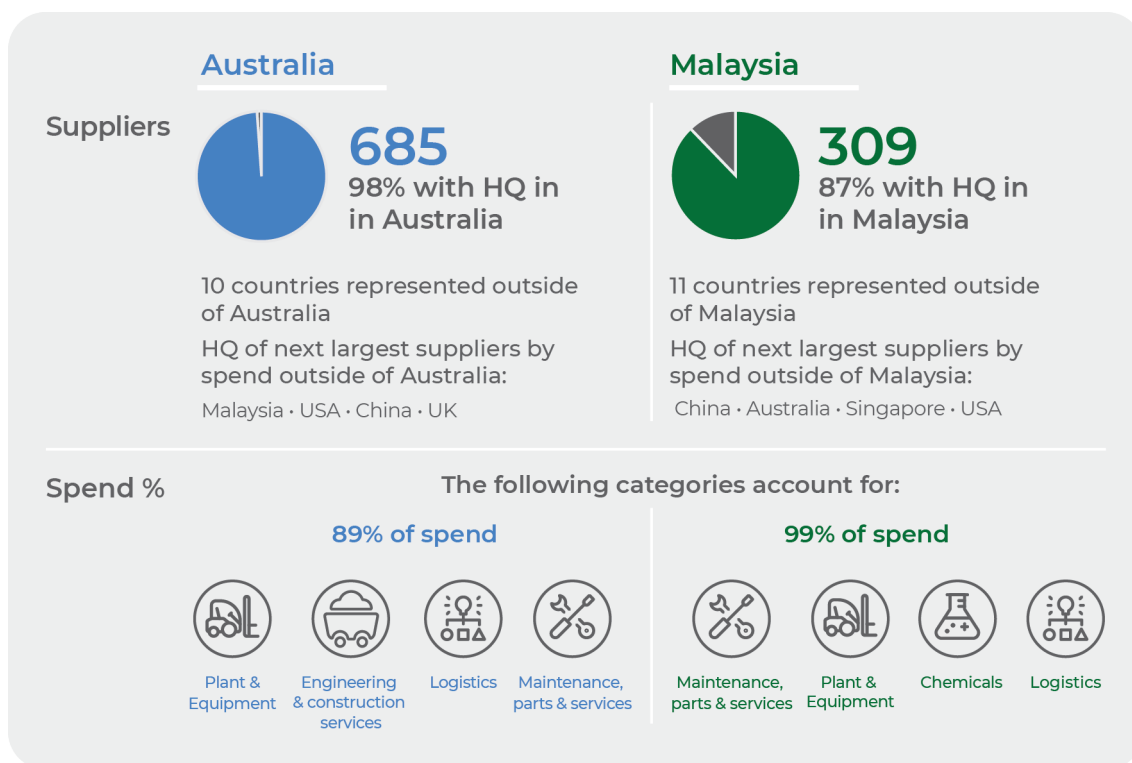
- Exploration program at Lynas' Mt Weld rare earths deposit in Western Australia;
- Mining rare earths at the Mt Weld deposit;
- Processing the rare earth ore into a rare earth concentrate at the Mt Weld site;
- Cracking and leaching the rare earth concentrate at the Lynas Malaysia plant in Gebeng; Cracking and leaching at the Kalgoorlie Rare Earths Processing Facility (commencing in the June quarter FY24);
- Solvent extraction at the Lynas Malaysia plant;
- Product finishing (drying and calcination) at the Lynas Malaysia plant;
- By-product management;
- Sales, marketing & transport of products from Lynas Malaysia to customers;
- Research & innovation for new products and processes.

Rare earths are used in future facing technologies designed to lower emissions and reduce energy consumption, as well as to improve efficiency, performance, speed, durability, and thermal stability.

The rare earth products produced by Lynas are traceable from mine to finished product as Lynas owns the mine and processing facilities and engages a contract partner for NdPr metal making. Lynas' product range currently includes: Neodymium and Praseodymium (NdPr) used in magnets, Lanthanum (La), Cerium (Ce) and a mixed Heavy Rare Earths compound (SEGH). Lynas intends to produce two separated heavy rare earths, Dysprosium (Dy) and Terbium (Tb), in Malaysia for the first time in 2025. The key markets for separated rare earth materials are rare earths manufacturing supply chains in east Asia, Europe and North America.

### 3.3 Our Supply Chains

*In FY24 we continued to monitor and analyse our supply chains to identify potential risk areas and engage with suppliers on addressing modern slavery risks in their organisations.*



Lynas' supply chains include both goods and services. Services provided to our operations include maintenance, repair, plant and equipment, freight logistics, cleaning and engineering and construction services. Procurement of critical inputs for our operations include fuel, utilities (electricity, gas, water), equipment and chemicals. Employee flights and accommodation, services and equipment for our new Kalgoorlie Rare Earths Processing Facility, and construction services and equipment for our Mt Weld Expansion project are also procured. Suppliers are generally engaged with Lynas via fixed or longer term contracts.

## 4. Risks of Modern Slavery in Operations and Supply Chain

This section addresses mandatory criteria three of the Modern Slavery Act

*Lynas is committed to playing a role in the development of robust and sustainable rare earths manufacturing supply chains. We recognise that managing the risk of modern slavery in our supply chains is critical to achieving this goal.*

Lynas' headquarters are located in Australia, together with our Mt Weld mine and concentration plant and Kalgoorlie Rare Earths Processing Facility. Australia has a low prevalence of modern slavery according to the Minderoo Foundation's 2023 Global Slavery Index<sup>1</sup>. Our Lynas Malaysia advanced materials plant is located in Malaysia which has a higher prevalence of modern slavery according to the 2023 Global Slavery Index.

Lynas has policies and procedures in place to mitigate the risks of modern slavery, including in our Malaysian operations and supply chains. As we expand our operations, we will expand our program of assessing modern slavery risks.

In assessing our risk of involvement in modern slavery risks, Lynas uses the UN Guiding Principles on Business and Human Rights' concepts of cause, contribute and directly linked where:

- A company may *cause* the impact through its own operations;

<sup>1</sup> <https://www.walkfree.org/global-slavery-index/>



- A company may *contribute* to the impact, for example through unrealistic expectation of a contractor or supplier that can only be met using exploited labour; or
- A company may be *directly linked* to modern slavery through a third party contractor or investment, for example if the third party engages forced labour despite safeguards in place.

We will continue to assess and address modern slavery risks and any impacts caused by, contributed to, or directly linked to our operations in line with the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Lynas has a number of controls in place to manage potential risks such as:

Potential risk	Controls & mitigation measures
Forced labour or other labour exploitation	<p>Consistent with Lynas policies and codes of conduct we:</p> <ul style="list-style-type: none"> <li>• Ensure employees and contractors receive appropriate remuneration</li> <li>• Follow applicable working hours in each jurisdiction in which we operate</li> <li>• Have thorough processes to ensure valid visas are obtained and border processes are followed</li> <li>• Have site access procedures to ensure non-residential contractors are in possession of their own valid visa and passport.</li> </ul> <p>We also conduct annual Modern Slavery training for all employees and promote the independently operated Lynas SpeakUp disclosure line (English &amp; Malay)</p>
Child labour	<ul style="list-style-type: none"> <li>• Lynas policies and codes of conduct expressly forbid the employment of anyone under the minimum legal working age or fifteen (15) years old; whichever is higher.</li> </ul>
Supplier modern slavery risks	<ul style="list-style-type: none"> <li>• Minimum requirements for suppliers are incorporated into the Supplier Sustainability Policy &amp; Code of Conduct, including respecting the basic rights of employees; implementing health, safety &amp; environmental protection standards; not using “conflict minerals”; not to engaging in or supporting the use of any form of forced, compulsory or illegal labour; and expressly forbidding the employment of anyone under the minimum legal working age or fifteen (15) years old; whichever is higher</li> <li>• Assessment of Supplier Modern Slavery Self-Assessment Questionnaire responses &amp; data analysis to identify higher risk categories and suppliers requiring additional due diligence</li> <li>• Supplier on site sustainability audits (including modern slavery risks)</li> <li>• Independently operated Lynas SpeakUp disclosure line available to suppliers and contractors</li> <li>• Increasing capability through supplier Modern Slavery training.</li> </ul>

Lynas has assessed the risk of modern slavery among our people as very low due to the policies and procedures we have in place. This includes prioritising local employment, directly supervising all on-site employees and contractors, and having a strict process in place to ensure that no illegal foreign workers are engaged as either employees or contractors at our sites.

In keeping with our commitment to making a positive contribution to local employment, skills, education, health and the environment, in 2024, 99% of employees in Malaysia are Malaysian nationals and 78% of employees in Australia are Australian nationals (the Australian figure is lower than in FY23 due to Lynas Malaysia employees assisting with the ramp up of the new Kalgoorlie Rare Earths Processing Facility in Western Australia).

Lynas works to ensure that employees receive pay and entitlements that are consistent with legislative requirements in Australia and Malaysia, including working time and conditions, are followed. Lynas also provides benefits, leave and allowances to foster employee wellbeing.

According to an economic impact assessment prepared by an external organisation, 99% of jobs created at Lynas Malaysia are in the middle and high-income categories and average income for a Lynas Malaysia employee is

approximately three and a half times the average income in the state where the Lynas Malaysia plant is located and approximately three times the national average income.<sup>2</sup>

In FY24, employees in Malaysia and Western Australia undertook annual modern slavery training for the fourth time. The training was enhanced to include recent modern slavery cases that had been reported in the media, the new Disclosure Line, and the actions Lynas is taking to prevent modern slavery. A post-training survey was undertaken to assess the effectiveness of the training and feedback on opportunities for improvement (survey results outlined in *section 5: Actions to address Modern Slavery*). Modern slavery training has also been included in induction training for new employees and contractors, and will continue to be delivered as part of annual training requirements. Modern slavery training was offered to Lynas Malaysia's suppliers for the second time in FY24.

Lynas encourages reporting of any concerns or breaches of our policies and we offer multiple avenues for employees and other stakeholders to raise their concerns, including an independently operated disclosure line. The Lynas Whistleblower Policy is publicly available on the Lynas website and contains protections and confidentiality provisions for whistleblowers: <https://lynasrareearths.com/about-us/corporate-governance/>. There were no modern slavery-related reports to the Disclosure Line in FY24.

## Our supplier policies

In line with UN Guiding Principles for Business and Human Rights, Lynas has policies and processes in place to meet our responsibility to respect human rights. This includes:

1. A Human Rights Policy outlining Lynas' commitment to respecting human rights;
2. A supplier due diligence process to identify, prevent, mitigate and account for Lynas' impacts on human rights;
3. Processes to enable the remediation of any adverse human rights impacts which are caused by, contributed to, or directly linked to Lynas' operations.

Lynas' commitment to respecting human rights is outlined in the Lynas Human Rights Policy. The Group's approach to assessing and managing risks in our operations and supply chains is outlined in the Lynas Code of Conduct and the Supplier Sustainability Policy and Code of Conduct. These Policies and Codes of Conduct are available at: <https://lynasrareearths.com/about-us/corporate-governance/>

Our Code of Conduct requires that Lynas does not source products or materials from civil war zones or other areas with severe human rights infringements.

These policies provide the framework for our supply chain management and supplier management processes – from supplier selection to supplier qualification and evaluation, and supplier development.

Lynas is committed to respecting all internationally recognised human rights as set out in the International Bill of Human Rights (comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the ILO Declaration on Fundamental Principles and Rights at Work, in line with the United Nations Guiding Principles on Business and Human Rights.

Lynas requires all suppliers to follow the Lynas Group's Supplier Sustainability Policy and Code of Conduct which reiterates and incorporates our commitment to the Ten Principles of the United Nations Global Compact, ILO conventions and the Lynas Business Conduct Standards.

Lynas seeks to audit major suppliers every three years,<sup>3</sup> including suppliers headquartered outside of Australia and Malaysia. In 2024, 18 on-site audits were undertaken, including 6 international suppliers. A case study on FY24 supplier audits is included below (*Case Study 2*).

## Assessing our supply chain risks

In FY24, Lynas continued the program of work to assess modern slavery risks in our operations and our supply chains and consider the risk that we are causing, contributing or directly linked to modern slavery practices.

In FY24, 95% of suppliers had headquarters local to our operations. Based on data analysis of a range of factors including spend and a risk rating based on industry, sector and country location, in FY24, higher risk categories included construction work and chemical supply. Construction services were required for major projects underway in Western Australia and the largest works program in over a decade at our Malaysian plant. Chemical supply is required for the processing and refining of rare earth materials to produce the oxides and NdPr metal required by manufacturers around the world.

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<sup>2</sup> [Lynas Malaysia's Economic Impact Report 2021 - Lynas Rare Earths](#)

<sup>3</sup> [https://rmke12.ekonomi.gov.my/ksp/storage/event/124\\_24\\_puan\\_nik\\_noor\\_ainoon\\_belanjawanku\\_reference\\_budget\\_for\\_malaysian.pdf](https://rmke12.ekonomi.gov.my/ksp/storage/event/124_24_puan_nik_noor_ainoon_belanjawanku_reference_budget_for_malaysian.pdf)

<sup>3</sup> Note: active suppliers above AUD10,000



In light of Lynas' role as an integrated producer from mine to finished oxide or NdPr metal, analysis of modern slavery risks in supply chain tiers demonstrates that modern slavery risks are highest in tier 1 of the supply chain and decrease with each tier of the supply chain. This provides opportunities for Lynas to directly assess modern slavery risks in the supply chain. As noted above, 18 on-site supplier audits were undertaken during the year (for further details see *Case Study 2*).

### Australia

For FY24, 98% of active contracts for Australian operations were with Australian headquartered suppliers. Australia is ranked 149 out of 160 countries on modern slavery prevalence with an estimated 1.6 victims of slavery per 1,000 population (Source: Minderoo Foundation's 2023 Global Slavery Index<sup>4</sup>). To date, Lynas has not identified any modern slavery risk factors in its Australian headquartered suppliers. The remaining 2% of active contracts were with 10 countries and of these, the most significant spend was with Malaysia, USA, China, and the United Kingdom.

According to the Global Slavery Index, Malaysia has a medium prevalence of modern slavery (estimated 6.3 victims per 1,000 population) and is ranked 72 out of 160 countries. Supplier risks in Malaysia are managed through policies and processes outlined below. The United Kingdom, USA, and China each have a relatively low prevalence of modern slavery, ranked 145, 122 and 111 out of 160 countries respectively.

### Malaysia

In FY24, 87% of active contracts for Lynas' Malaysian operations were with Malaysian headquartered suppliers. Lynas recognises that the Minderoo Foundation's 2023 Global Slavery Index identifies Malaysia as having a medium prevalence of modern slavery (ranked 72 out of 160 countries on modern slavery prevalence with an estimated 6.3 victims per 1,000 population).

The remaining 13% of active contracts for our Malaysian operations were with 11 countries. Of these, the most significant supplier countries by spend were China, Australia, Singapore and the United States.

According to the Global Slavery Index, China, Australia, Singapore and the United States have a relatively low prevalence of modern slavery, ranked 111, 149, 138 and 122 out of 160 countries respectively.

Lynas continued to raise awareness of modern slavery and increase supplier capability during 2024. This included holding two supplier education sessions on modern slavery and anti-bribery and corruption (see *Case Study 1*).

Lynas has stringent requirements for Malaysia-based suppliers, including supplier audits and a process to ensure that no illegal foreign workers are engaged as either employees or contractors at our sites. To date, Lynas has not identified any significant modern slavery risk factors in its Malaysian headquartered suppliers, however, we continue to assess supplier modern slavery risks and work with our suppliers to develop capability in this area as needed, including where working conditions or policies and procedures need to be strengthened (see *Case Study 2*).

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<sup>4</sup> <https://www.globalslaveryindex.org>

## 5. Actions to Address Modern Slavery

This section addresses mandatory criteria four of the Modern Slavery Act

### Supplier due diligence system

Lynas requires all suppliers to comply with our Supplier Sustainability Policy and Code of Conduct.

Our Supplier Sustainability Policy and Code of Conduct requires all suppliers to agree to respect the basic rights of employees, institute strong health and safety and environmental protection standards, and not source minerals from conflict-affected and high-risk areas.

The Lynas Supplier Sustainability Policy and Code of Conduct includes a specific commitment to not engage in or support the use of any form of forced, compulsory or illegal labour.

Lynas recognises that a key risk identified through the analysis of our supply chain is suppliers not complying with our Supplier Sustainability Policy and Code of Conduct. To address this, we have implemented a Supplier Management Process that includes due diligence, supplier self-assessments and supplier audits. We continue to assess the efficiency of this process and opportunities for improvement.

The Lynas Supplier Management Process provides a range of interrelated procedures and tools to ensure transparency and awareness with regard to procurement processes, suppliers, and risks and opportunities in the supply chain. Key aspects of the process include the application of rigorous criteria for supplier selection and qualification.

### Data management & risk assessments

Lynas assessed a number of digital data platforms for suitability to assist our data management and risk assessments during FY23. In FY24, a preferred platform was selected to enhance data based risk assessment.

The data management platform enables the distribution, collection and assessment of Supplier Self-Assessment Questionnaires (SAQs) and identifies higher risk suppliers for further follow up. A new SAQ was issued to over 300 suppliers to Lynas Malaysia during the year. Key learnings from this process included the range of supplier experience with this kind of assessment – from those who regularly provide this information to suppliers who had not completed a modern slavery SAQ previously. For suppliers in the latter category, Lynas' supplier webinar addressed requirements for each part of the SAQ as well as resources available.

As part of a new global supplier onboarding process, the online SAQ will be distributed to new suppliers as they commence supply agreements with Lynas and assessed on an ongoing basis.

Where Lynas identifies any gaps in supplier compliance with the Supplier Sustainability Policy and Code of Conduct, we offer to work with the supplier to provide guidance for new policies, procedures or improvements. We are committed to helping our suppliers to improve, however, if problems persist and/or a supplier is unwilling to implement the measures required, they will be excluded from our list of suppliers.

Lynas implements a Supplier Qualification Process, which is regularly reviewed and updated. Where suppliers are identified as having a risk profile, supplier quality audits are undertaken which include questions about sustainability that cover all aspects and requirements of the Supplier Code of Conduct. In FY24, 18 on-site audits were completed, including 12 Malaysian and 6 international audits. *Case Study 2* below outlines FY24 supplier audit outcomes.

In FY24, Lynas held a modern slavery training session for Malaysian and international suppliers to build capacity in this area. The webinar was attended by 65 suppliers. A post-webinar survey found that prior to the webinar, 35% of respondents had a limited understanding of modern slavery and 65% had a good understanding. Following the webinar, this increased to 65% having a good understanding and 35% having an excellent understanding of modern slavery; 100% of respondents understood how Lynas and our suppliers play a role in preventing modern slavery; and 87% understood the importance of Supplier Self-Assessment Questionnaires (SAQs) and onsite audits to monitor the risk of modern slavery. Respondents expressed interest in future webinars on modern slavery policies, updates in labour laws, and human resources management.

A further in-person supplier training session was included in Lynas Malaysia's 2024 Vendor Appreciation Day (see *Case Study 1*).

## Case Study 1: Engaging with our suppliers



Lynas is committed to building capability within our supply chain on preventing modern slavery and other supplier sustainability issues.

In 2024, Lynas held a webinar training session for Malaysian and international suppliers for the second consecutive year. The webinar was facilitated by Lynas' Procurement team and featured presentations by Lynas' VP Corporate Affairs and General Counsel.

Following positive feedback on the 2023 supplier webinar, the session focused on identifying and addressing modern slavery risks and building supplier capability in the areas of modern slavery and anti-bribery and corruption. As Lynas had recently issued modern slavery Self Assessment Questionnaires (SAQs) to suppliers, the webinar covered the information required, to assist those completing this kind of questionnaire for the first time, as well as information and resources available to enhance supplier capability. In response to feedback received on the FY23 supplier training, the session included opportunities for suppliers to ask questions and share information.

In July 2024, Lynas Malaysia celebrated over 10 years of partnering with Malaysian businesses at Lynas' inaugural Vendor Appreciation Day held in Kuantan, Malaysia. The Day recognised the valuable role local businesses play in Lynas Malaysia's ongoing success, and the opportunity for Lynas to share the sustainable benefits of our operations through local employment and local suppliers.

During the in-person event, a session was facilitated by Lynas' General Counsel focused on opportunities for suppliers to enhance their management of modern slavery and anti-bribery and corruption risks. Feedback received included a supplier who had put in place new internal processes following the supplier webinar held earlier in the year, demonstrating the effectiveness of supplier engagement and training.



## Case Study 2: Auditing our supply chain



In FY24, Lynas audited 18 suppliers via on site audits. Of the suppliers audited, 12 were located in Malaysia, 5 were located in China, and 1 was located in India.

The results of the audits found 14 suppliers achieved a score of 75% or above, while the remaining 4 suppliers achieved scores between 50% and 74.9%.

One third of suppliers audited had a standalone human rights policy, while the remaining two thirds addressed human rights and modern slavery as part of procedures, employee handbooks or company statements.

No modern slavery practices were identified during the supplier audits. However, opportunities for improvements were identified and shared with suppliers.

One supplier was re-audited in FY24 as an on site audit conducted during FY23 had found that their policies and procedures did not address human rights. While no modern slavery practices were identified at the supplier, the FY23 audit identified issues with their supplier management processes. The Lynas audit team supported the supplier to establish relevant policies, procedures and shared best practice examples.

During the FY24 audit, Lynas found significant improvements had been made by the supplier, resulting in an audit score of 88%. The supplier has developed its own Human Rights Policy and employee handbook to ensure employee benefits and rights were clear and transparent. They also established a contract management process for their suppliers including human rights, environment, and health and safety standards. This was an excellent outcome of the audit process and active engagement with the supplier.

## Grievance mechanisms

Lynas is committed to ensuring our employees, contractors, suppliers and communities can raise concerns regarding modern slavery without being subjected to victimisation, harassment or discriminatory treatment, and to have such concerns properly investigated.

There are multiple avenues for employees to raise concerns or report incidents. This includes raising issues or concerns with a supervisor or manager, the VP People & Culture, the General Counsel, or any member of the Lynas Leadership Team.

The Lynas Whistleblower Policy contains protections and confidentiality provisions for whistleblowers, consistent with applicable legislation, as well as contact details for an independently operated Disclosure Line.

A new disclosure line, Lynas SpeakUp, was launched at the start of the FY24 year. The disclosure line is independently operated by Deloitte Conduct Watch and is available in both English and Malay languages. Disclosure line training was undertaken by all staff as part of the annual Code of Conduct & Anti-bribery and Corruption training in June 2023 and again in June 2024.

Employees, contractors, business associates and members of the community can report concerns or breaches of our policies to the Lynas SpeakUp disclosure line. Information on the Lynas SpeakUp was included as part of supplier education sessions held during the year.

The Lynas Whistleblower Policy contains protections and confidentiality provisions for whistleblowers, consistent with applicable legislation, as well as contact details for the Lynas SpeakUp disclosure line.

Details on Lynas SpeakUp are available in the Whistleblower Policy at <https://lynasrareearths.com/about-us/corporate-governance/>.

## Remediation framework

Lynas aims to prevent or mitigate the risks of modern slavery in our operations and supply chains as much as possible. In the event of any concerns being raised about modern slavery in our organisation or in our supply chains, Lynas has a process to assess, address and remediate.

This includes ceasing or changing an activity in order to prevent or mitigate the risk of modern slavery occurring; leveraging relationships with suppliers to encourage them to cease or change activities in their organisation that may present risks of modern slavery; or, if this is not successful, to end the business relationship whilst taking into account the potential human rights impacts of this action.

## External verification and initiatives

Provenance matters to our customers and we participate in external verification and industry initiatives that provide customers with confidence that our materials have been responsibly and ethically produced, through our integrated supply chain from our mine in Western Australia to our advanced materials plant in Malaysia and metal making partner in Vietnam.

Lynas is a signatory to the United Nations Global Compact, which includes the protection of human rights and the elimination of all forms of forced and compulsory labour as part of its Ten Principles.

Lynas participates in Together for Sustainability (TfS), a joint initiative and global network of chemical companies to deliver a global standard for environmental, social and governance performance of chemical supply chains. The TfS program is based on the UN Global Compact and Responsible Care® principles. In March 2023, Lynas Malaysia was awarded a Gold Medal Sustainability rating from EcoVadis for the third time, based on performance across the environment, labour and human rights, ethics and sustainable procurement. Lynas Malaysia first achieved a Gold Medal rating in 2019. A gold medal rating places Lynas in the top 5% of companies assessed by EcoVadis globally.

Lynas has been active in international standards development for rare earths supply chain. This includes involvement in the development and publication of ISO traceability standards covering the rare earths supply chain from mine to magnets; participating in working group activities related to Sustainability standard development; and active involvement in the creation of ISO standards for rare earths analytical methods.

## FY24 Action Plan & Progress:

A summary of the progress on each of the identified actions for FY24 is outlined below.

FY24 Action	FY24 Progress
<b>1. Develop enhanced supplier onboarding process</b> <ul style="list-style-type: none"><li>– Including development of online Supplier Code of Conduct and SAQ</li></ul>	New global onboarding procedure developed and forms available on staff intranet. New vendor forms to be collected and assessed as part of supplier onboarding.
<b>2. Build capacity and understanding for Modern Slavery issues within suppliers</b> <ul style="list-style-type: none"><li>– Hold supplier training on human rights issues</li></ul>	A 1-hour online webinar was organised for Malaysian suppliers was held and attended by 65 suppliers. Content included modern slavery awareness and risks, how Lynas manages modern slavery risks, and information and resources on best practices for implementation by suppliers. A further in-person supplier education session was held for Malaysian suppliers as part of the 2024 Vendor Appreciation Day.
<b>3. Sustainable procurement training for global procurement team</b> <ul style="list-style-type: none"><li>– Investigate and undertake sustainable procurement refresher training for global procurement team members</li></ul>	Members of global procurement team completed ISO 20400 Sustainable Procurement training modules.
<b>4. Integrate modern slavery data risk assessment into procurement process</b> <ul style="list-style-type: none"><li>– Data risk assessment of suppliers and their value chain as part of onboarding and ongoing procurement, including identification and follow up of higher risk suppliers</li></ul>	18 on-site audits conducted.  Over 300 Modern Slavery Self-Assessment Questionnaires issued.  New supplier onboarding process developed.

## FY25 Action Plan

- 1. Implement ISO 20400 Sustainable Procurement Guidance Standard**
  - Identify enhancements to sustainable procurement strategy, policies and processes
- 2. Progressively rollout supplier assessments as part of new supplier onboarding procedures**
  - Identify key contact for supplier SAQs during onboarding and issue digital SAQ
- 3. Distribute and assess Australian supplier Modern Slavery SAQs**
  - Incorporate learnings from Malaysian supplier SAQ process
- 4. Enhance on site supplier audits**
  - Implement updated process & checklist introduced in FY24



## 6. Assessing Effectiveness of Actions

This section addresses mandatory criteria five of the Modern Slavery Act

Lynas is committed to ensuring that we hear about and address modern slavery effectively.

As noted in the UNGP, grievance mechanisms can only be effective if the intended users are aware of them, understand how and when to use them, and trust them enough to do so.

Lynas assesses effectiveness of modern slavery actions in a range of ways including:

- Monitoring feedback and usage of the independently operated disclosure line, Lynas SpeakUp. To date feedback received indicates the service is easy to use and fit for purpose.
- Conduct a post-training survey following staff modern slavery training & incorporating feedback into future training sessions
- Conducting a post-webinar survey following supplier modern slavery training & incorporating feedback into future training sessions
- Monitoring feedback from partners and suppliers, including feedback received on SAQ and supplier audit requirements
- Sharing feedback and learnings with the Modern Slavery working group.

## 7. Consultation with Owned or Controlled Entities

This section addresses mandatory criteria six of the Modern Slavery Act

As noted on page 4, Lynas' subsidiaries are all wholly owned and operate under the same leadership team and Board.

Lynas recognises that each entity within the Group has a role to play in addressing modern slavery risks and has consulted with representatives of each of our wholly owned subsidiaries in preparing this Statement.

This included the development of a Group-wide Modern Slavery working group with representatives from both Australian and Malaysian operations. This included the Company Secretary & General Counsel of the Group and its subsidiaries, the Chief Financial Officer for the Group and subsidiaries (with responsibility for procurement and risk), the VP Corporate Affairs (with responsibility for ESG impact), the Group Accountant and representatives of the Contracts and Procurement and Corporate Affairs teams. The working group met regularly throughout FY24 and also engaged with the Lynas Leadership team, the Lynas Board and key departments across the group including People & Culture, Training, Finance, Sales and Sustainability.

The working group has developed both a Group-wide response to preventing modern slavery and Group and country-specific actions.

## 8. Collaboration

This section addresses mandatory criteria seven of the Modern Slavery Act: Any other relevant information

Lynas is a signatory to the UN Global Compact and during FY24, members of the Modern Slavery working group participated in UNGC human rights sessions with industry and civil society participants.

In addition, Lynas issued the supplier Self-Assessment Questionnaire (SAQ) for completion by suppliers as part of onboarding, held training and information sessions for suppliers, and worked with suppliers to address any issues identified through the SAQ and on-site audits.

## 9. Appendix: Modern Slavery Statement Annexure

### Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Lynas Rare Earths Ltd as defined by the *Modern Slavery Act 2018* (Cth)<sup>1</sup> (“the Act”) on 19 December 2024.

### Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Lynas Rare Earths Ltd as defined by the Act<sup>2</sup>: John Humphrey, Chair of the Board of Lynas Rare Earths Ltd and Amanda Lacaze, CEO and Managing Director, Lynas Rare Earths Ltd.

### Mandatory criteria

The page number/s of this statement that addresses each of the mandatory criteria in section 16 of the Act is outlined in the following table:

Mandatory criteria	Page
a) Identify the reporting entity	2-3
b) Describe the reporting entity’s structure, operations and supply chains	3-5
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	5-8
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	9-13
e) Describe how the reporting entity assesses the effectiveness of these actions	14
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (and consultation with the entity covered by the statement)	14
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant	14 (Collaboration)

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1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
  2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

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**Lynas**  
Rare Earths