



**2023**  
**Modern  
Slavery  
Statement**



**Sandfire is committed to upholding the fundamental human rights of all people.**

## About this statement

### About this statement

This Modern Slavery Statement (Statement) has been prepared to meet the requirements of *Australia's Modern Slavery Act 2018* (Cth) (the Act). It details the actions Sandfire and its controlled entities have undertaken to identify, and address, the risks of modern slavery within in our operations and supply chains.

All references to our, we, us, the Group, the Company, and Sandfire refer to Sandfire Resources Limited (ABN 55 105 154 185) and its subsidiaries. Our 2023 reporting entities are set out in Appendix 2.

This Statement was published on 20 December 2023 and covers the period from 1 July 2022 to 30 June 2023. References in this report to 'year' are to the financial year ended 30 June 2023, unless otherwise stated.

All monetary amounts are expressed in US Dollars.

### Approval

This Statement was prepared in consultation with subject matter experts from our procurement, legal and sustainability team.

This Statement was approved for publication by Sandfire's Board of Directors on 1 December 2023.

**John Richards**  
Non-Executive Chair

### Feedback

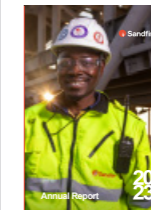
We pride ourselves on voluntary and transparent disclosure and welcome feedback on our Statement and other aspects of our business. Please visit the [Contact Us](#) page of our website to provide feedback.

### Contents

About this statement	1
FY23 Highlights	2
Message from our CEO	3
Our road map	4
Our business	7
Human rights governance	14
Identifying human rights and modern slavery risks	16
Addressing human rights and modern slavery risks	22
Collaboration	27
Assessing effectiveness	28
Appendix 1 – Modern Slavery Act content index	30
Appendix 2 – Our 2023 reporting entities	31

### Our FY23 reporting suite

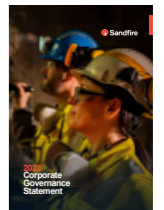
This Statement forms part of our annual reporting suite which also includes our Annual Report 2023, Sustainability Report 2023 and Corporate Governance Statement 2023, all of which are available on our website at [www.sandfire.com.au](http://www.sandfire.com.au).



2023  
Annual Report



2023  
Sustainability Report



2023 Corporate  
Governance Statement

### Acknowledgements

Sandfire acknowledges the Indigenous, Traditional and Tribal Peoples of the lands, waters, and territories on which it conducts its business.

We acknowledge their rich culture and connections to land, water, and territories. We pay our respects to their culture and people, their Elders, and leaders past, present and emerging.

# FY23 Highlights



**Appointed Chief Sustainability Officer**



**Developed a modern slavery roadmap**



**1,322 direct employees<sup>1</sup>**



**3,653 contractors<sup>2</sup>**



**11 permanent part-time employees**



**66% MATSA employees**

covered by Enterprise agreements



**2,406 suppliers<sup>3</sup>**

engaged across the business



**94%**

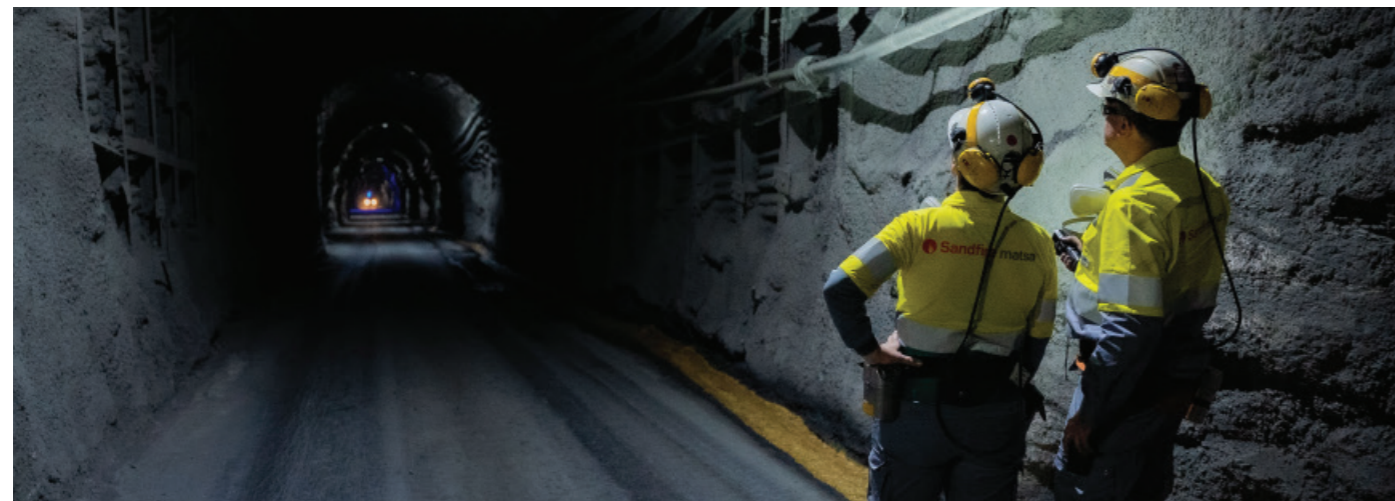
products and services sourced from Spain, Australia and Botswana



**\$806.9m total procurement spend**



**Joined the United Nations Global Compact**



# Message from our CEO



**We have a responsibility to uphold the fundamental human rights of our people, those who reside in our host communities, those within our supply chains and all who interact with our business.**

This year's Modern Slavery Statement is a reflection of our commitment to being purpose led; 'We mine copper sustainably to energise the future'.

In 2023, we strengthened our commitment to sustainability and human rights protection by joining the United Nations Global Compact. This will drive us to ensure our strategies and operations are aligned with universal principles on human rights, labour, environment, and anti-corruption, and to advance societal and environmental goals.

This year marks the 75th anniversary of the Universal Declaration of Human Rights. However, abuses of human rights continue worldwide. Modern slavery is a complex issue that affects every organisation. Despite governments and business pledging to put an end to exploitative employment practices, the estimated number of people living in modern slavery has increased by 10 million since 2016.

We believe concerted effort is required to achieve lasting change. We support the further strengthening of the Australian Modern Slavery Act 2018 (Cth) and welcome the introduction of mandatory due diligence requirements in Europe.

We know we have more work to do to address the reality of modern slavery. In developing this year's Statement, we intentionally focused on understanding our gaps and developing an appropriately resourced modern slavery roadmap.

In 2023 we welcomed Cath Bozanich, our first Chief Sustainability Officer, to our team. Cath brings extensive human rights and modern slavery experience to her role. I am confident that the appointment of Cath gives this critical matter the right level of attention.

During 2024 we will focus on a number of key priorities, including the need to update our global human rights framework, further strengthen our systems for detecting and responding to modern slavery risk, and building greater capability to address modern slavery wherever we do business.

I am pleased to present this year's Statement and welcome your feedback.

**Brendan Harris**  
Managing Director and CEO

1. As at 30 June 2023  
2. As at 30 June 2023  
3. Some suppliers are used by each of our assets and may be captured multiple times in the reported data.

# Our road map

Our modern slavery road map details the actions we will undertake to improve our management of human rights and modern slavery risks and impacts.



## Policy and governance

FY23 Commitment	Progress	FY23 Actions
No commitment made in FY22 Modern Slavery Statement.	NA	Elevated the management focus on human rights and sustainability with the appointment of Sandfire's first Chief Sustainability Officer.

### FY24 - FY25 commitments

- Update Global Human Rights framework by 30 June 2024.
- Review and refresh applicable policies and standards by 30 June 2024.



## Strategy

FY23 Commitment	Status	FY23 Actions
No commitment	NA	Published refreshed ESG Framework and its goal to create positive change by working collaboratively with business partners to uphold human rights.

### FY24 - FY25 commitment

- Develop a Modern Slavery Strategy by 31 December 2024, to ensure the Group is appropriately responding to modern slavery risks.



## Collaboration and engagement

FY23 Commitment	Status	FY23 Actions
Engage with assets on their processes.	In progress	Our legal team reviewed critical clauses for MATSA contracts. The Corporate Procurement and Sustainability team will enhance the minimum mandatory requirements for due diligence in FY24 and this will be rolled out across the business. Became signatories to the United Nations Global Compact. Undertook a gap analysis against third party Modern Slavery Statements amongst the ASX 200.

### FY24 - FY25 commitments

- Establish an internal Human Rights Steering Group by 31 December 2023.
- Join and become an active participant of the Australian Human Rights Resources and Energy Collaborative by 31 December 2023.



## Training and competency

FY23 Commitment	Status	FY23 Actions
Provide modern slavery training to our people, including the Board and employees of our owned and controlled assets.	In progress	All new starters undertook Code of Conduct training, which includes an overview of Sandfire's commitment to upholding human rights. Standalone human rights and modern slavery training was postponed until FY24.

### FY24 - FY25 commitments

- Develop human rights learning modules for roll out in FY24.
- Provide in-person modern slavery awareness training for key stakeholders in Sustainability, Procurement, Human Resources, Operations, Shipping and Compliance by 30 June 2024.



## Systems and technology

FY23 Commitment	Status	FY23 Actions
Implement third party risk management software tool and incorporate into our risk assessment process.	In progress	Implementation of third-party risk management software commenced in Australia. Global implementation delayed due to issues encountered during roll-out.

### FY24 - FY25 commitments

- Complete roll-out of third-party due diligence software by 30 June 2024.
- Review procurement and supplier on-boarding systems by 30 June 2024, to assess whether they optimise opportunities to manage human rights matters.



## Due diligence and remediation

FY23 Commitments	Status	FY23 Actions
Perform supplier due diligence, including the utilisation of risk management software.	In progress	Due diligence undertaken during tender phase for higher risk suppliers. Assessment below Tier 1 for solar panel suppliers. Grievance process updated.
Undertake third party audit for our highest risk suppliers.	Not achieved	No third-party audits undertaken in FY23. These will be undertaken in FY24. Investigations into the supply chain of food served at the camps as well as security and cleaning services will be further investigated
Assess and action findings from the human rights impact assessment for the Motheo Copper Hub in Botswana.	Achieved	The Human rights impact assessment completed for Motheo.

### FY24 - FY25 commitments

- Develop a global SAQ by 30 June 2024.
- Enhance due diligence processes to further align with the UNGPs.
- Screen at least 50% of our suppliers for modern slavery risks by 30 June 2024.
- Undertake a Global Human Rights Saliency Assessment by 30 June 2024.
- Align our remediation and response framework to Walk Free's Response and Remediation Framework and the UNGPs advice for implementing the UN's Respect and Remedy Framework by 30 June 2024.
- Undertake third party audits on two higher risk suppliers by 31 December 2024.



Our values **direct our behaviour.**

## Our business

### Our purpose

We mine **copper** sustainably to energise the future.

#### As a purpose-led organisation:

We bring our people, communities, and other stakeholders together to make a positive long-term, sustainable contribution and have a lasting social impact.

We **mine** with an unwavering focus on safety and are proud of our capability in the mining and processing of minerals.

Our commitment to safety goes beyond the safe operation of our assets. It means prioritising the safety of our people and always protecting the environment.

We are excited to play our part in meeting the world's demand for **copper** and other critical metals.

Copper is an essential metal for powering the global economy, vital to the construction and industrial sectors, and central to the decarbonisation movement.

We are committed to **sustainably** operating our business to create a better future for our people and local communities, protect the environment in which we operate and generate long-term value for our stakeholders.

Sustainability is at the heart of our business and part of every decision we make. We believe that non-financial performance is connected to long-term value creation.

We operate our business with the understanding that trust is earned by demonstrating genuine commitment and action.

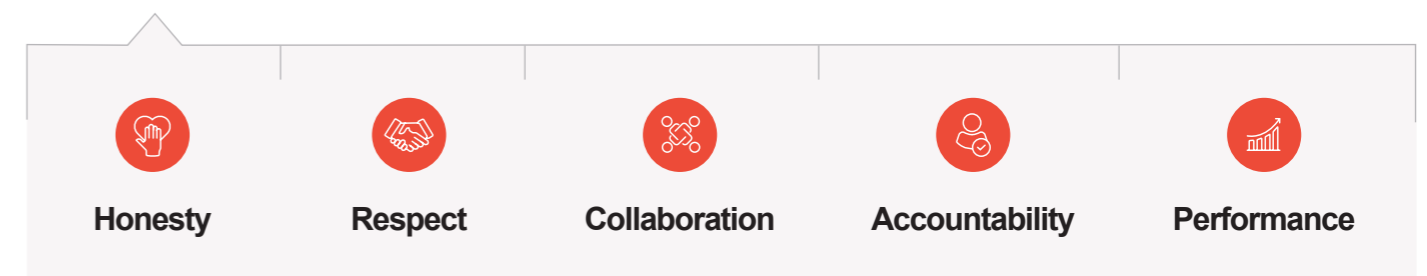
Our people are unwavering in their commitment **to energise** communities, business, and industry by creating positive socio-economic benefits and by supplying critical minerals.

And through this commitment, we help power the global transition to a low-carbon, net zero **future**.

### Our values

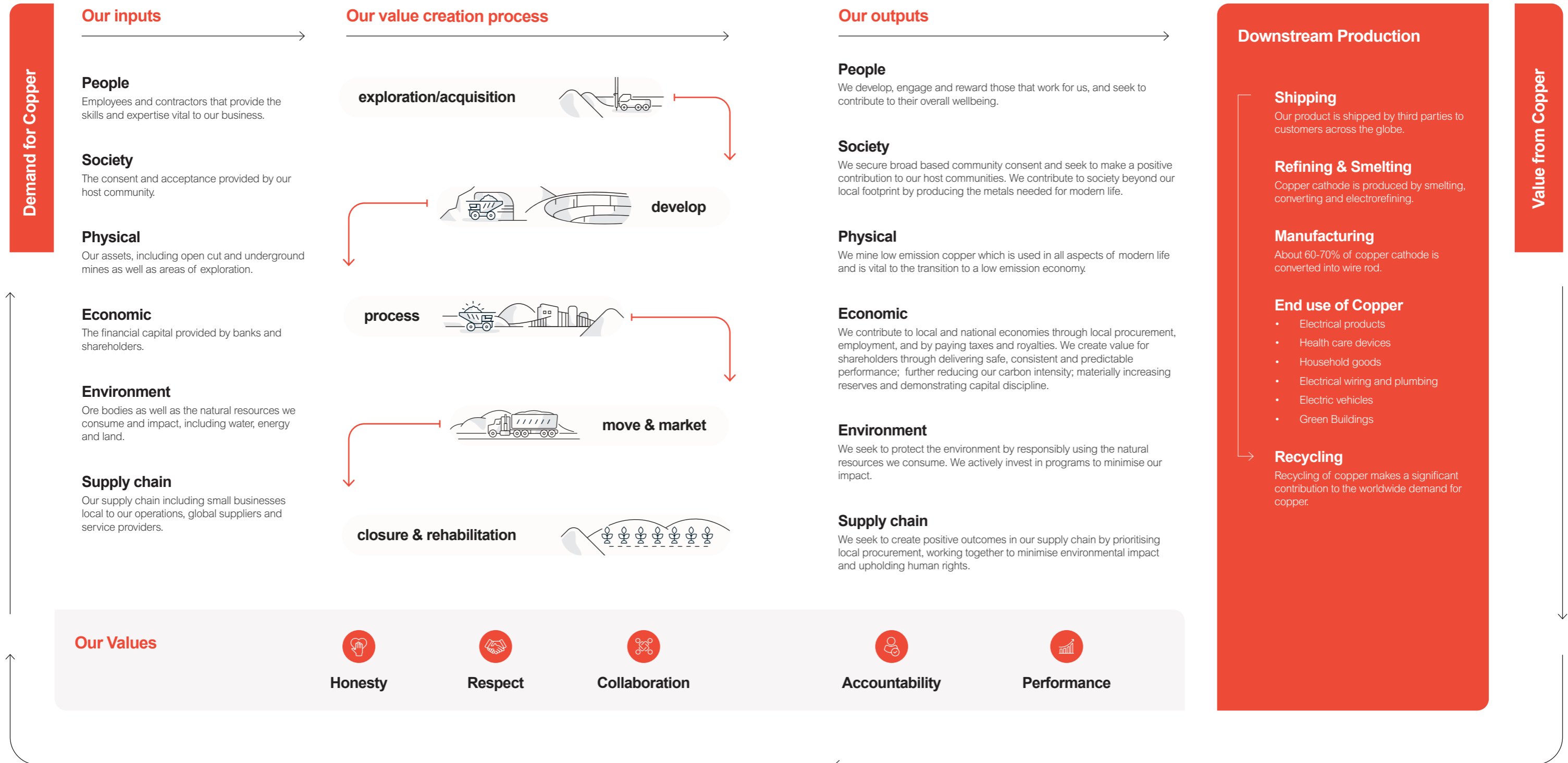
**Our values direct our behaviour** - defining how we work together and informing every decision we make. We act responsibly and embed sustainability, inclusivity, and diversity to achieve our purpose.

#### Our values are:



## Unlocking value

Our purpose - We mine copper sustainably to energise the future.



## About us

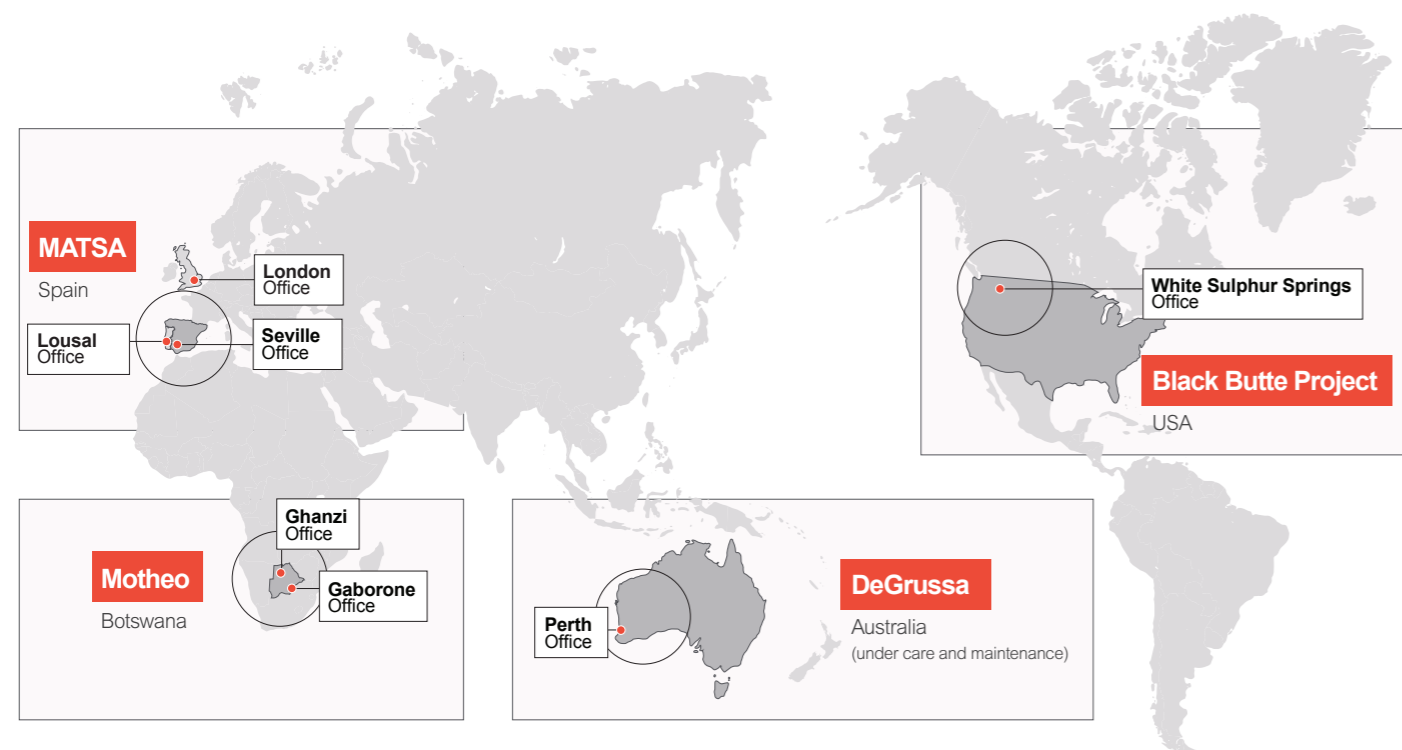
### Sandfire is a sustainable mining company transforming into a global copper producer of significance.

With a demonstrated commitment to the highest safety standards, we mine copper sustainably to energise the future. Copper continues to play a vital role in the electrification and decarbonisation of the global economy, and we are well placed to support the green energy transition.

Sandfire was established in 2003 and is a public company listed on the Australian Securities Exchange. We hold 15 owned and controlled entities (see Appendix 2).

Our registered office is in Perth, Western Australia, with corporate offices in:

1. London, UK
2. Seville, Spain
3. Gaborone, Botswana
4. Lousal, Portugal
5. White Sulphur Springs, USA



## Our operations

The extractives industry is considered high risk for instances of modern slavery, particularly in countries that have a higher prevalence of modern slavery. We do not operate in countries identified as having a higher prevalence of modern slavery.

Our mining operations include hubs in Australia, Botswana and Spain, although our Australian operations moved into care and maintenance during FY23.

We also have an advanced development option in the United States and focused near-mine exploration programs in Botswana and Spain, and undertake targeted regional exploration within Botswana, Namibia, Spain, Portugal and in the USA.

### Motheo, Botswana

Motheo is our new, long-life asset located in the central portion of the Kalahari Copper Belt in Botswana. The Motheo operations were officially opened in August 2023 and are centred around the development and mining of the T3 and A4 Open Pit mines. Motheo produces high quality copper concentrate (containing a silver by product) at the current rate of around 3.2Mtpa. Production is expected to increase to 5.2Mtpa in FY24. The mine's copper concentrate is transported by truck to Walvis Bay, Namibia, for shipping to smelters around the world.

As of 30 June 2023, Motheo's workforce was comprised of 304 direct employees and 1,160 contractors<sup>4</sup>. Ninety five per cent of the total workforce are Botswana nationals. Most employees work on a 14 days on and 7 days off roster, staying on site during their work swing. The workforce drives to site from their place of residence and accommodation, and three meals are provided each day for all workers.

Operations are supported by our community office in the nearby town of Ghanzi, which is the focal point for managing employment and community relations in the Ghanzi District.

The communities nearest to the Motheo site are the villages of Kuke, D'Kar, Qabo, Grootlaagte, Hanahai, and Ghanzi Town. We support social initiatives in partnership with the Ministry of Local Government and its supporting councils.

The Ghanzi region is home to large scale cattle ranching with beef production being important to the local community and national economy.

### MATSA, Spain

Our MATSA operations are located in the Huelva Province of southwestern Spain in the highly prospective Iberian Pyrite Belt. MATSA is a polymetallic mining operation comprised of a central processing facility with a capacity of 4.7Mtpa that refines ore from three underground mines, Aguas Teñidas and Magdalena near Almonaster la Real, and Sotiel near Calañas. The processing facility produces copper, zinc and lead mineral concentrates (containing a silver byproduct) that are shipped from the port of Huelva. An office in Sevilla provides corporate support services.

As of 30 June 2023, MATSA's workforce was comprised of 766 direct employees and 2,331 contractors<sup>5</sup>. Approximately 80 per cent of MATSA's skilled workforce is drawn from local towns in the Huelva Province. The workforce commutes to and from work each day and there is no accommodation needed on site.

MATSA supports programs that promote economic, social, educational, cultural and heritage development within adjacent municipalities, including Almonaster la Real, Cortegana, Calañas and El Cerro de Andévalo.

In addition to mining, other local industries include agriculture and agroforestry.

<sup>4, 5</sup> Contractor numbers fluctuate over the year depending on mining activities and are higher during periods of maintenance and construction.

### DeGrussa, Western Australia

The DeGrussa operations are located 900km north-east of Perth in Western Australia, and historically included the high-grade DeGrussa and Monty Copper-Gold Mines. Sulphide ore from underground mining operations at DeGrussa was delivered to a 1.6Mtpa processing facility that produced copper concentrate (containing a gold and silver byproduct).

The DeGrussa workforce historically flew in and out of Perth, with shifts ranging from 14 days on and 7 days off, to 4 days on and 3 days off. We provided flights, accommodation and three meals per day for everyone who works on the site. At the height of operations, the site accommodated up to 500 people.

Underground mining operations at DeGrussa were completed in 2022. Processing of mineralised waste and oxide stockpiles was undertaken from November 2022 to May 2023. The site transitioned into care and maintenance in May 2023 and future options are being considered for the operation, including closure and rehabilitation, and divestment.

The DeGrussa asset is located within the Murchison region of Western Australia, 150km north-east of the nearest town of Meekatharra. During the life of DeGrussa, Sandfire contributed over \$7.7 billion to the Australian economy and contributed over \$3.5 million through voluntary community contributions.

We were one of the first companies in Australia to use renewable energy in an off-grid application. The innovative \$40 million DeGrussa Solar Project was commissioned in June 2016.

### Black Butte

Black Butte is located in central Montana in the United States of America. Sandfire holds an 87 per cent interest, via Canadian listed company Sandfire Resources America Inc. (TSX-V: SFR) (Sandfire America).

The Black Butte Copper Project is one of the world's highest-grade undeveloped copper projects. The proposed mine development will use best-practice technology and modern mining techniques to develop an underground mine with minimal surface footprint and environmental impact.

The Montana Department of Environmental Quality released the Final Environmental Impact Statement on 13 March 2020 and issued a positive Record of Decision to grant a Mine Operating Permit (MOP) on 9 April 2020. The MOP was the first issued in Montana in 26 years. The Black Butte Project is awaiting resolution of a legal challenge to its mining permit before Phase 2 construction work can begin.

The closest town to Black Butte is White Sulphur Springs, which is located 17 miles (27 kilometres) south of the project. Managing the expected impacts to White Sulphur Springs, Meagher County and Montana is a key focus for Sandfire America.

The proposed underground mine will provide significant economic benefit to central Montana, if managed well.

### Exploration

Exploration is a key component of our business strategy as we look to materially increase reserves.

Our exploration strategy focuses on both near-mine and regional exploration targets, as we look to maximise the strategic value of our modern processing hubs and broader landholding in the highly prospective Iberian Pyrite Belt in Spain and Portugal, and the Kalahari Copper Belt that extends from Botswana into Namibia.

## Our Supply Chain

### Supplier spend

During FY23, we procured \$806.9m in goods and services to support our exploration, mining and corporate office activities. These goods and services were procured from 2,406 suppliers from 33 countries.

We spent over 94 per cent of our total procurement spend in the three countries where our operations are located - Spain, Australia, and Botswana.

### Supporting local suppliers

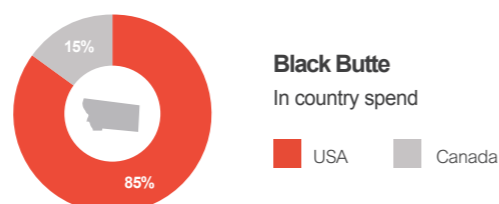
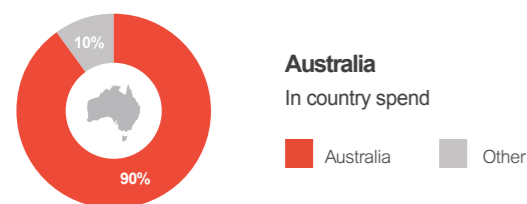
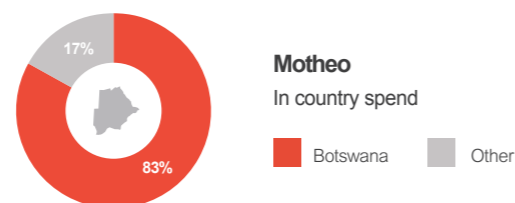
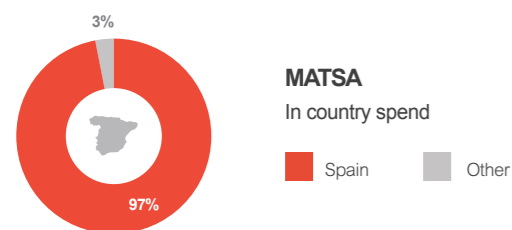
Local procurement can deliver significant benefit to host communities, and we are committed to providing the business opportunities that will assist our communities to become self-sustaining. Local procurement can also de-risk supply lines for our company.

Each operation is required to develop a local procurement strategy and set targets to maximise local content. We provide local businesses access to procurement and contracting opportunities, and support capacity building projects. We also set goals for our larger contractors and suppliers to provide business and employment opportunities for local communities.

### Goods and services procured

We procure goods and services across a wide range of categories, from small local businesses, through to global suppliers and service providers. The categories of good and services procured are listed below.

Category	Description
Mining services	Underground and open pit mining, camp management, engineering, environmental, laboratory and shutdown services
Operational goods and supplies	Machinery, vehicles, equipment and parts, protective personal equipment and clothing, vehicles, fuel supply, cement, explosives, earth movers, grinding media, flocculants, IT supply, medical/ health equipment supplies, tools, warehouse/ logistics supplies, mineral processing equipment supplies, oils and lubricants
Labour hire	Labour hire to backfill vacant positions or for short term work
Logistics and transport services	Inbound road freight, dry bulk haulage, international freight, shipping
Camp village supplies	Food, catering suppliers, beverages
Exploration support services and supplies	Drilling and geophysical contractors, drill tools, general hardware and analytical laboratories
Travel and accommodation	Flights, vehicle hire, hotels and bus services



## Our workforce

As of 30 June 2023, our workforce comprised of 1,322 direct employees. Across our operations, 24 per cent of our direct employees are women. This includes 25 per cent in Botswana and 21 per cent in Spain, which is significantly higher than the industry averages of those regions. At a senior level, 42 per cent of our Executive team are women. This is the same for our Board where three of the seven Directors are women.

Our workforce is made up of employees who we engage directly, and contracting personnel who work in our mining operations.

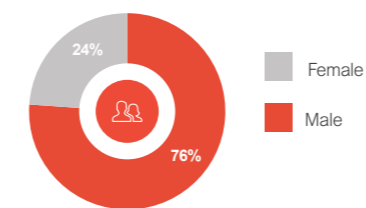
Our direct workforce includes qualified professionals such as geologists and mining engineers, tradespeople including electricians, operational staff, support personnel and administrators. We also offer apprenticeships and university graduate roles as part of our education and training initiatives.

Contractors are critical to our business and make up over 70 per cent of our total workforce. As of 30 June 2023, there were 3,653 contractors on our sites. We rely on them for a range of services including mining operations, camp management, transport of our product, and for short term specialised work such as maintenance shutdowns. We also engage contractors via labour hire to backfill vacant positions or for short term work, either through our contracting companies or through labour hire companies.

### Gender Balance

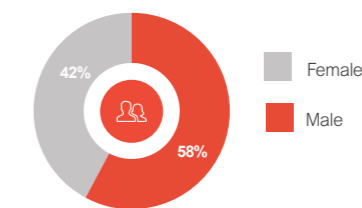
#### Overall

As of 30 June 2023



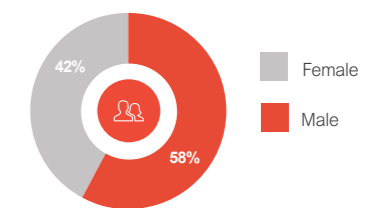
#### Board\*

As of 30 June 2023



#### Executive\*

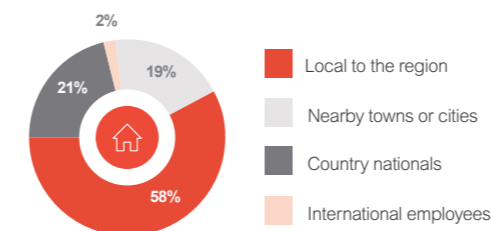
As of 30 June 2023



\* Our CEO and Managing Director is captured in the gender balance data for both the Board and Executive.

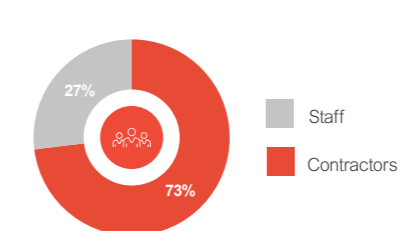
### Local Employment

As of 30 June 2023



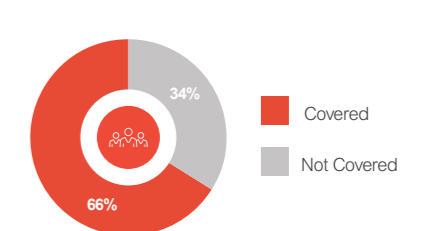
### Our Workforce

As of 30 June 2023



### Employees covered by collective bargaining agreements - MATSA

As of 30 June 2023



### Livelihood restoration program – Motheo, Botswana

This year, Sandfire supported one of the women resettled at D'Kar to establish a jewellery business as part of the Livelihood Restoration Program. Ms Quba, a Basarwa woman, makes jewellery which highlights the rich culture, vibrant colours, and unique history of Basarwa using designs passed on for generations.

Ms Quba makes a stunning collection of bracelets, earrings, necklaces, and head wraps which are made from locally sourced materials such as ostrich eggshells and beads. Not only does she enjoy the work, but Ms Quba also said, "making the crafts is essential income that pays for school fees, groceries and electricity for my home."

Eager to help others in the community and share her passion, Ms Quba hopes to bring D'Kar women together through craft-making to export Basarwa products internationally.

[Case Study](#)



# Human rights governance

**The Board and management are committed to maintaining and enhancing corporate governance so that it continues to contribute to Sandfire’s purpose and refined strategy.**

## Board of directors

Our corporate governance structure includes a Board of Directors (Board), who are responsible for establishing the corporate governance framework of the Company. The Board guides and monitors the business and affairs of the Company on behalf of shareholders. Directors are elected by the shareholders and accountable to them.

In performing its responsibilities, the Board acts in the best interests of the Company and its shareholders, acting honestly, fairly, diligently and independently in accordance with the duties and obligations imposed upon it by Sandfire’s Constitution and the law.

The Board has four sub-committees to help fulfil its responsibilities:

- Audit and Finance Committee
- Risk and Sustainability Committee
- People and Performance Committee
- Nominations Committee.

These sub-committees are supported by the Executive Leadership Team (ELT), internal experts and working groups with representation across different business units and operations.

Whilst the Board is responsible for establishing the corporate governance framework, good governance is the collective responsibility of all team members.

## Risk and Sustainability Committee

The Risk and Sustainability Committee assists the Board in fulfilling its responsibilities and oversight of the Company’s sustainability performance, including compliance with our Human Rights Policy and all relevant policies, standards and procedures.

The Committee seeks direction from the Board on risk management and compliance matters and is delegated the role of reviewing and reporting on Sandfire’s annual Modern Slavery Statement and its annual Sustainability Report.

The Committee consists of four Independent Non-Executive Directors, Jenn Moris, Sally Martin and Paul Harvey, and is chaired by Independent Non-Executive director Robert Edwards.

## Day to day management

Our CEO is accountable for the implementation of our human rights approach with support from the Chief Sustainability Officer.

At a corporate level, human rights and modern slavery risks are managed by our Procurement, Sustainability, Shipping, Legal and Human Resources teams. These functions set the standards for the business.

Day-to-day management at our assets is undertaken by operational teams who have on ground knowledge of the local operating context.

In FY24, we will establish a Human Rights Steering Group (the HRSG). The HRSG will be an internal working group responsible for overseeing the management of human rights, including modern slavery, across the company. The HRSG will be comprised of senior members from across the business including Procurement, Sustainability, Shipping, Legal, Human Resources and Operations.

## Our policy framework

### Our Code of Conduct and Human Rights Policy form the foundation of our approach to managing human rights.

Our policy framework supports our people, the delivery of our strategy, and provides a role in effective and responsible decision making and business conduct. Integral to the framework is our [Code of Conduct \(Code\)](#). The Code guides our behaviours and reinforces the importance of conducting our work responsibly.

Our Human Rights Policy details our commitment to respect human rights, to undertake human rights due diligence and facilitate the remediation of adverse human rights impacts that we have contributed to or caused through our activities.

Our Human Rights Policy is complemented by our Community Policy, Our People Policy, Inclusion and Diversity Policy, and Supplier Code of Conduct which are supported by internal standards, including our Human Rights Standard and our Sustainable Procurement Standard.

Our internal standards are made available to our employees and contractors on our company intranet, and communicated via internal communications channels and training programs. Our operating sites are subject to assurance activities to ensure these standards are adhered to.

We assess potential human rights risks and impacts as part of our due diligence on major business development opportunities, including mergers and acquisitions.

As we develop and/or expand our projects we assess the likelihood of our activities impacting on human rights and in accordance with our Human Rights Standard, undertake a human rights impact assessment where deemed necessary.

The Board and Management Team regularly review the policy framework to ensure it reflects the strategy of the Company, current legislation and stakeholder expectations.

During FY24, we will be working with our operations to ensure we have adequate policies and processes in place as we prepare for pending legalisation following the European Union’s Corporate Sustainability Due Diligence Directive (CSDDD).

## Key policies

Policy	Purpose	Communication and compliance
Code of Conduct	Sets out the standards of conduct expected from our people and includes our commitment to uphold the human rights of all, including those in our business and supply chains.	Publicly available on our website. Available to our employees and contractors via our intranet. Training on the requirements of our Code is mandatory for all employees and major contractors.  Breaches of the Code are viewed as a serious matter and can lead to disciplinary action including termination of employment and/or legal action.
Human Rights Policy	Guides the management of human rights risks and impacts, and includes a commitment to observe the universal rights as set out in the United Nations’ Guiding Principles on Business and Human Rights, International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.  The policy applies to everyone who works for us (employees and contractors).	Publicly available on our website. Available to our employees and contractors via our intranet. Forms an integral part of our induction and training process.  Breaches of this policy can be reported through a number of channels including through local grievance mechanisms, our independent whistleblower service and through internal reporting to line managers.
Supplier Code of Conduct	Sets out the behaviours and business practices we expect of our suppliers and complements contractual arrangements we have with our suppliers. We expect that our suppliers communicate and, to the extent possible, apply the principles of the Supplier Code in their supply chain.	Our Supplier Code is issued to all suppliers during the tendering process and is available on our website. Details of Sandfire’s Whistleblower Protection Policy and how to raise concerns are included within the Supplier Code.
Anti-Bribery and Corruption Policy	Describes our zero-tolerance stance on all forms of corruption and bribery, and commits us as a minimum to complying with all applicable laws and regulations of the countries in which we operate.	Publicly available on our website. Available to our employees and contractors via our intranet.  Training against the requirements of our Anti-Bribery and Corruption Policy is mandatory for all employees and major contracting companies and their personnel.
Whistleblower Protection Policy	Commits us to foster a culture where any officer, employee or contractor is encouraged to speak up about potential misconduct and ethical concerns in an environment where they feel safe, knowing their concerns are treated confidentially and that they will be free from reprisal.	Publicly available on our website. Available to our employees and contractors via our intranet.  Referenced in our Code of Conduct and our Supplier Code of Conduct. Training against the requirements of our Whistleblower Protection Policy is mandatory for all employees and major contractors
Risk Management Policy	Commits us to managing and minimising risk by proactively and systematically identifying, analysing, and treating exposures that could potentially impact our business.	Publicly available on our website. Available to our employees and contractors via our intranet.  The Board, via the Risk and Sustainability Committee, oversees the effectiveness of this Policy. All employees are responsible for managing risk in accordance with this Policy.
Community Policy	Commits us to delivering a lasting, positive contribution to the communities where we operate, recognising that a community’s endorsement of our activities is fundamental to the success of our business.	Publicly available on our website. Available to our employees and contractors via our intranet.
Our People Policy	Commits us to creating a workplace that empowers and enables our people to achieve their full potential	Publicly available on our website. Available to our employees and contractors via our intranet.

Further information about corporate governance at Sandfire, as well as copies of our Board and Committee Charters, Code of Conduct and various policies can be found at [www.sandfire.com.au](http://www.sandfire.com.au).

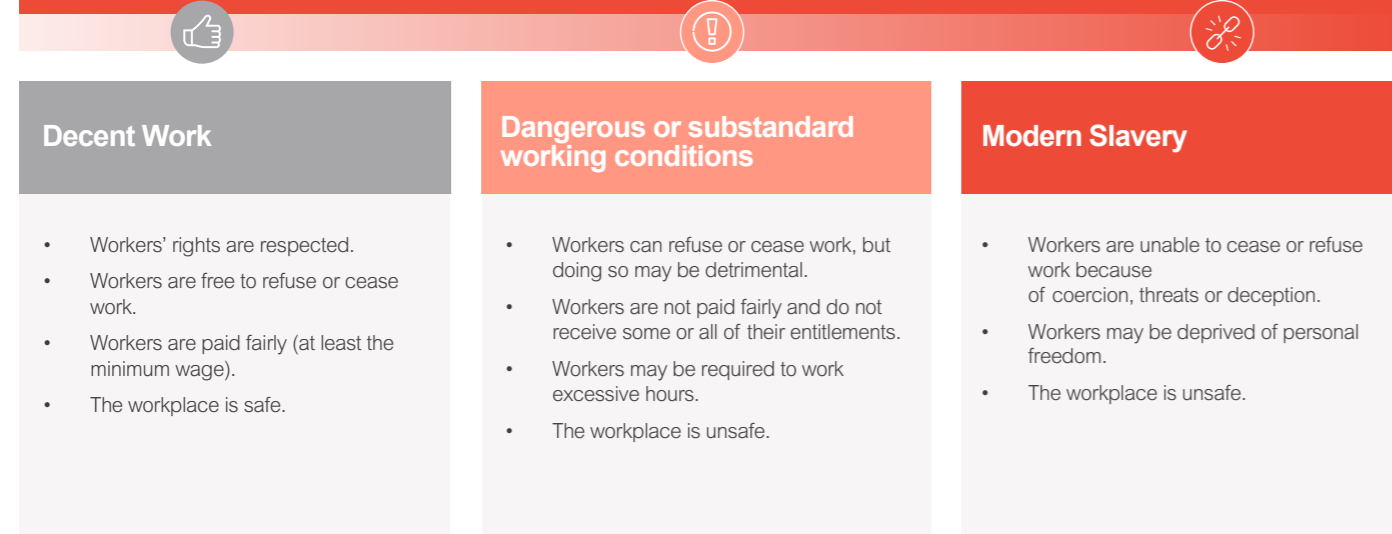
# Identifying human rights and modern slavery risks

We are committed to upholding the fundamental human rights of our people, those who reside in our host communities, those within our supply chains and other stakeholders who interact with our business.

We believe that modern slavery cannot be addressed in isolation from other human rights issues.

Whilst labour rights breaches including substandard working conditions or underpayment of workers, does not constitute modern slavery in isolation, these are harmful and illegal, and can indicate insufficient policy and governance frameworks, which if left unchecked can escalate into modern slavery.

**Modern slavery happens at the most extreme end of the spectrum, ranging from decent work to criminal exploitation.**



## Risk management

Sandfire recognises that risk is inherent in our business and that the effective management of risk is vital to safely deliver our refined Strategy and achieve our Purpose.

To effectively manage risk, we have an established risk management process aligned to the International Standard for Risk Management AS/NZS ISO 31000:2018. This involves regular monitoring of internal and external factors that have the potential to affect our business. Our risks are regularly reviewed, assessed, and managed at both a global strategic level, as well as at operational, project and functional levels.

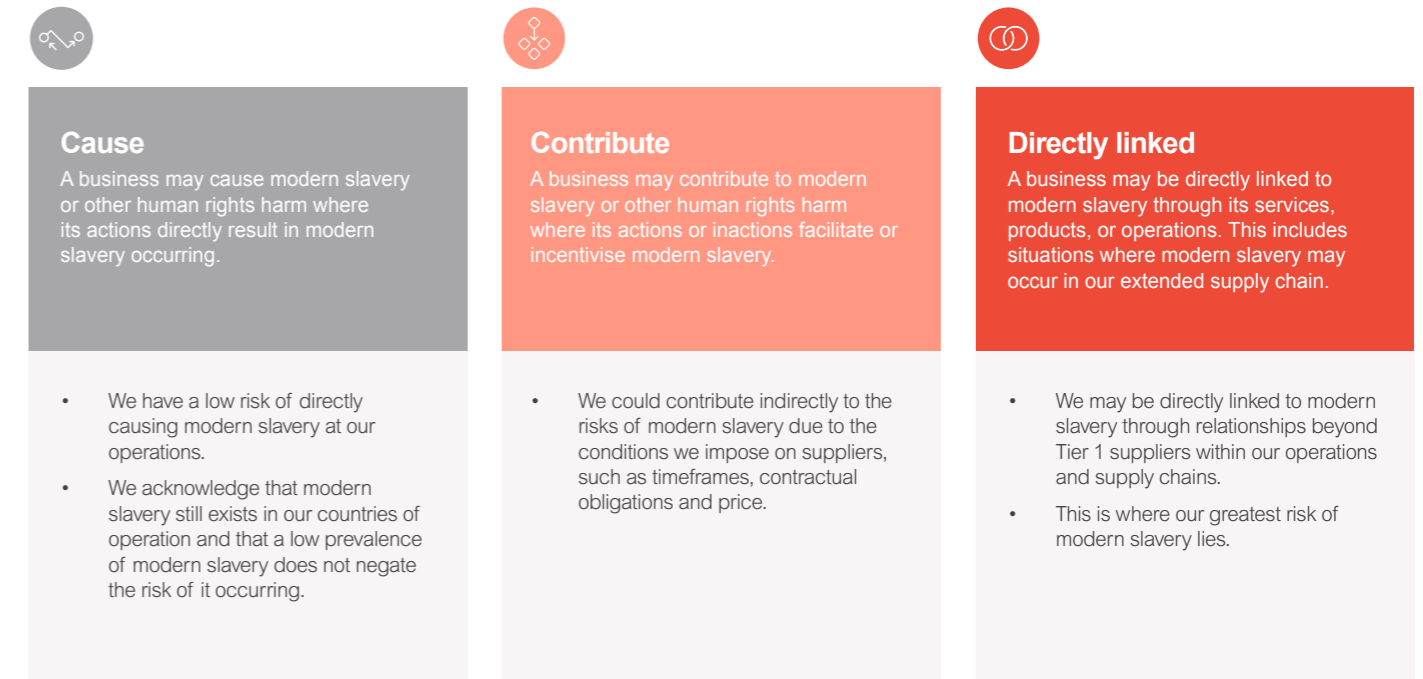
We disclosed the principal risks that have the potential to impact the achievement of our strategic objectives in our 2023 Annual Report on pages 30 through 37.

Human rights and modern slavery related risks are maintained and managed through our Enterprise Business Risk Register, which is discussed with the Risk and Sustainability Committee on a quarterly basis.



## United Nations guiding principles on business and human rights

We are working to further align our approach to human rights and modern slavery to the UNGPs, and to gain a better understanding of the ways in which our activities may cause, contribute to, or be directly linked to modern slavery.

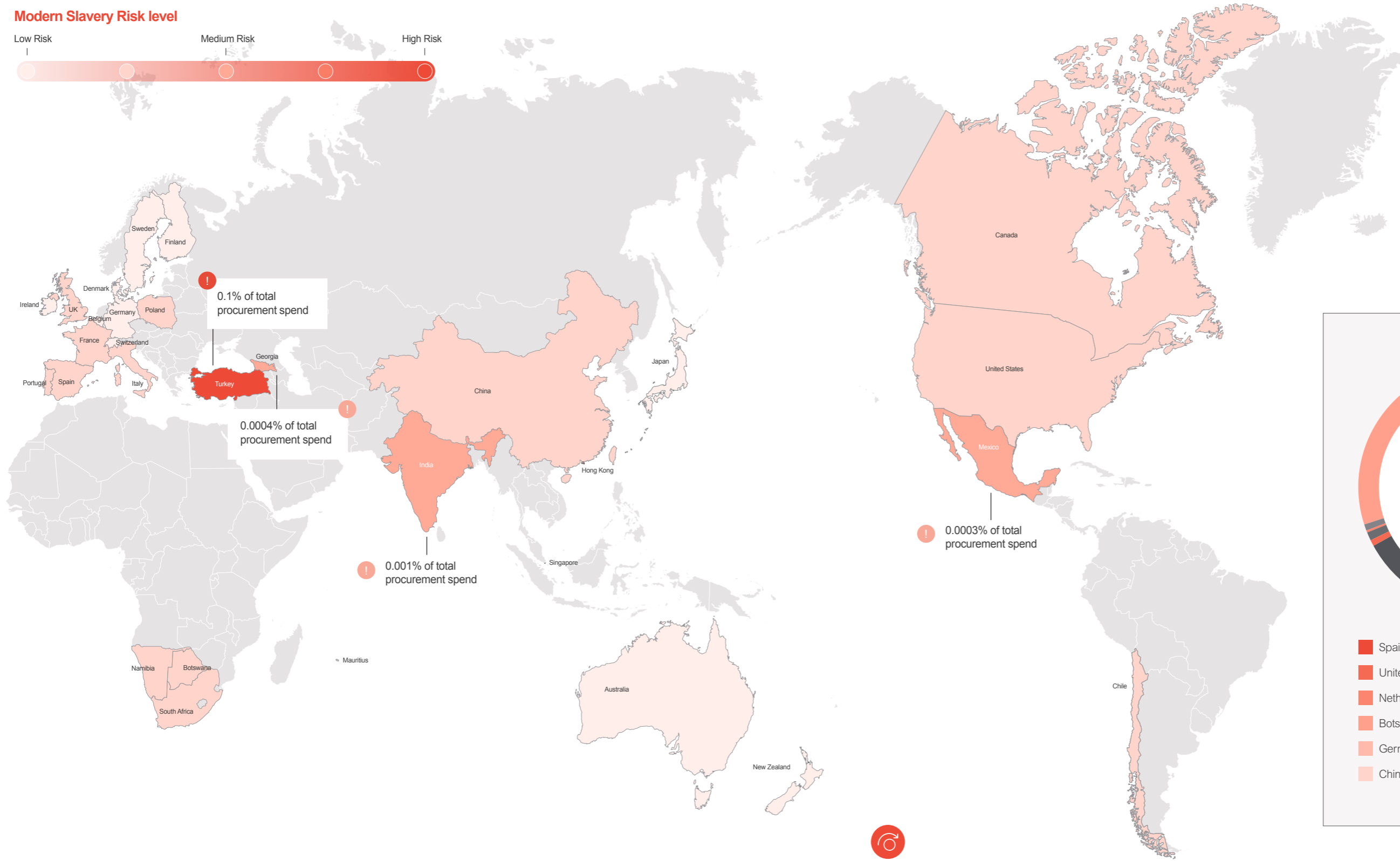


## Salient human rights

We acknowledge that mining has the potential to impact human rights. A desktop assessment identified the following potential human rights issues for our business. This desktop work will be tested, verified and expanded upon as we undertake a global human rights saliency assessment in FY24.

Right	Detail
Labour rights	Mining has a history of hazardous working conditions and can impact on the health, safety and wellbeing of its workers, and there is a fundamental need for all employers to ensure a diverse and equitable workplace, free from discrimination.
Rights of First Nations People	In areas where indigenous peoples are present, proper community consultations and Free, Prior, and Informed Consent (FPIC) can be a source of conflict. There is also the potential to impact culture and heritage.
Environmental impact	Access to good quality water is a common impact to communities. Other impacts include increases in air and noise pollution, increased road traffic, and the use of hazardous materials in mining.
Land acquisition	Insufficiently negotiated land acquisition, displacement of communities, and changes in land use can result in human rights violations and lead to conflict.
Supply Chains	The procurement of goods and services has the potential to contribute to human rights abuse of workers in the supply chain.
Security	Private security contractors may take actions against community members or employees that violate their human rights.
Economic and social disruption	An influx of workers to an area can strain transportation, education, and health systems. If workers are on higher incomes, they can increase the cost of housing and basic goods. Economic transformation may change social dynamics, impacting traditional beliefs, increasing inequality and diluting social cohesion.

## Modern Slavery Risk level



## Exposure to geographic risk

We directly sourced products and services from 33 countries in FY23, with more than 94 per cent of our total procurement spend being in Spain, Botswana, and Australia. Of the 33 countries, Turkey, Mexico, India and Georgia are considered medium to high risk according to the Global Slavery Index 2023<sup>10</sup>. Although we do not consider spend a specific contributor to modern slavery risk, we use it as an indicator of risk and see it as a greater opportunity to influence. The goods and services we procure from the four high-risk countries combined account for less than 0.10 per cent of our total procurement spend.

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



## Beyond Tier 1

The risk of being directly linked to modern slavery in our supply chain is more likely to occur beyond Tier 1. Our ability to detect and influence becomes more challenging at this level, as we have no contractual relationship with these suppliers and a limited ability to require them to comply with our minimum standards. From FY24, it will be a priority for all elements of our business to enhance supplier due diligence processes for high-risk products to gain a better understanding of the risks of modern slavery beyond Tier 1.

## Human rights risks in our supply chain

Modern slavery can exist in every stage of the supply chain, from harvesting or extracting raw materials - such as cotton or cobalt – to manufacturing and shipping. Most supply chains are long and complex, rendering it difficult to trace all components of a product and to oversee who is working where and under what conditions.

We recognise that our modern slavery risk profile can be shaped by risk factors relating to geography, particular products and services, particular entities, and the supply chain of our suppliers over which we have limited visibility.

We prioritise procurement from the countries in which we operate. This approach has resulted in most of our Tier 1 suppliers being in geographies that do not have a high prevalence of modern slavery according to the Global Slavery Index<sup>9</sup>. However, we understand that the location of our suppliers does not absolve us from risk, as our suppliers may source goods and services from countries and industries with heightened risks of modern slavery. Gaining a better understanding of the risks deeper in our supply chain will be a priority for FY24/FY25.

The following categories have been identified as being at a higher risk for modern slavery within our supply chain.

### Elevated risk supply categories

### Key risk factors

### Our relationship to the risk



Electrical products and components

The electronics industry is a global and highly competitive industry, and is recognised as being an industry with a high prevalence of modern slavery.

Electrical components require minerals, such as cobalt, tin, coltan, tungsten, polysilicon, gold, and copper which may be sourced from conflict affected and high-risk geographies.

The manufacture of electronic products often occurs in high-risk geographies where workers are vulnerable to modern slavery due to limited regulation and cheap labour.

We procure electrical products and components through multiple suppliers and for various uses in our operations, including computers and laptops for our workforce, through to high specification instrumentation at our processing plants.

Suppliers in this category will be subject to additional screening as part of our enhanced due diligence processes in FY24.



Renewable energy

40-45% of the world's solar grade polysilicon is sourced from the Xinjiang region in north-west China, where reportedly 2.6 million people have been subjected to serious human rights violations including internment, re-education programs, coercion, forced and child labour.

15 – 30% of the world's cobalt is sourced from the Democratic Republic of the Congo. Amnesty International found that children as young as seven, were working in artisanal mines. Mining conditions were found to be hazardous, and workers were not provided with adequate protection.

In FY23, we announced plans to install a large-scale solar facility at Motheo as well as a facility at MATSA.

MATSA has entered into a Memorandum of Understanding with Endesa Energia for the planning and permitting of a dedicated MATSA solar facility.

We plan to undertake detailed due diligence ahead of awarding the contract for the Motheo solar facility. See page 29 for more details.



Protective clothing (PPE)

The production of clothing and apparel carries a higher risk of modern slavery. These products are often produced in countries which have a higher prevalence of modern slavery. The supply chains are often complex and include the sourcing of raw materials from countries where workers are vulnerable to exploitation.

Without adequate due diligence and contractual terms there is a risk that we may contribute to modern slavery practices.

PPE is mandatory for all personnel who work on our sites. We source PPE for our direct workforce.

Suppliers in this category will be subject to additional screening as part of our enhanced due diligence processes in FY24.

### Elevated risk supply categories

### Key risk factors

### Our relationship to the risk



Transportation including shipping and road haulage

The prevalence of modern slavery is higher in certain sub-industries of transportation including shipping and road haulage.

Shipping is a complex industry with a high risk of modern slavery. Shipping companies often rely on low skill labour from geographies that are vulnerable to modern slavery.

COVID-19 exacerbated these challenges, with instances of seafarers being stranded on ships, unable to dock and change crews, wages being withheld, and poor living and working conditions.

At Motheo, we charter vessels directly from owners and operators as well as via brokers to transport our product to customers. Prior to entering into a contractual agreement, we screen the vessel and counterparties involved for sanctions compliance, and labour and human rights issues.

MATSA sells directly to a customer who takes receipt of our product at Huelva Port.

We engage contractors to undertake in-bound freight services as well as haulage of our copper concentrate to ports.



Construction

The construction industry is at a higher risk of modern slavery due to complex supply chains, and the prevalence of low skilled labour sourced through third party labour hire agreements.

Raw materials could also be sourced from countries with a higher prevalence of modern slavery.

Our construction activities occur in our countries of operation, which according to the Global Slavery Index have a low prevalence of modern slavery.

During the recent construction of the Motheo Copper Mine, we engaged construction workers directly as well as sub-contracted. All people who work on our sites are subject to the same working arrangements and conditions as our direct employees.



Third-party labour hire

Labour hire arrangements can lead to reduced visibility over recruitment and labour management practices, which introduce a higher risk of modern slavery.

Short term labour hire can attract migrant workers who may be more vulnerable to requests to pay recruitment fees.

We rely on third party labour hire from time to time. All people who work on our sites are subject to the same working arrangements and conditions as our employees.

Via our issues reporting processes, we were made aware of some contracting entities making late payments to their workers. We investigated these matters and the issues were rectified.



Facilities management including catering and cleaning

Cleaning and catering services are often associated with workers who may be migrant or seasonal workers. Cleaning and catering companies often source low skilled labour.

We engage camp management contractors at our mine sites directly, and for Motheo and DeGrussa these contracts include our standard Modern Slavery clauses.

All people who work on our sites are subject to the same working arrangements and conditions as our employees.

The facilities managers of the office spaces we lease engage cleaning companies to provide cleaning services.



Security services

Security services are often provided by low skilled labour and can attract migrant workers who are more vulnerable to requests to pay recruitment fees, underpayment, or non-payment of wages.

The use of security services can give rise to human rights abuse of protestors.

Security services are provided by contractors at our MATSA and Motheo operations.

Spain and Botswana are not conflict-affected geographies, but we acknowledge there is the potential for human rights issues and modern slavery.

The contracting entities we engage will be subject to additional screening from 2024 as part of our enhanced due diligence processes. This may include a need to align to the Voluntary Principles on Security and Human Rights.



Supply of food

The food production industry attracts migrant and seasonal workers. Fish, rice, sugarcane, cocoa and beef are widely recognised as sub-industries with a high risk for modern slavery.

Our catering contractors are responsible for sourcing food for our on-site camps.

We have identified potential labour issues associated with the production of beef in Botswana.

Suppliers in this category will be subject to additional screening as part of our enhanced due diligence processes in 2024.

9 Walk Free Foundation. 2023. Global Slavery Index. <https://www.walkfree.org/global-slavery-index/>

# Addressing human rights and modern slavery risks

Human rights and modern slavery risks in our operations and supply chains will change as our business and conditions around the world evolve.

Factors which will impact our risk profile include any entrance into new countries, contractual relationships with new suppliers and changes to our business strategy. External events such as inflation, pandemics, natural disasters and climate change will exacerbate human rights impacts and the vulnerability of workers and communities.

## Managing our modern slavery impacts

We have identified the key areas and business activities where modern slavery impacts may occur. The systems and processes we have in place to manage these impacts are also described below.

### Our operations

#### Direct employees

There is the potential for us to contribute to, or be directly linked to, modern slavery within our operations. The low prevalence of modern slavery in our countries of operation, together with the composition of our workforce, employment practices and our policy framework, reduces the risk of modern slavery practices for our direct employees.

Key recruitment and labour management processes implemented to minimise risks and impacts include:

- Undertaking identity and age checks before entering into an employment contract.
- Providing all employees with a written contract in their preferred language with employment terms clearly described, including the shift work arrangements for operational personnel.
- Avoiding the use of recruitment agencies. If used, they are screened to ensure recruitment fees are not taken from employees.
- Paying all employees their legal pay entitlements on time, and providing payslips that clearly define payments and leave entitlements.
- Providing safe, clean and spacious accommodation at our operations and exploration sites, and ensuring all accommodation facilities provide bathing and toilet facilities.
- Upholding the right to freedom of association and collective bargaining. As of 30 June 2023, 66 per cent of our employees at MATSA were covered under a Collective Bargaining Agreement and negotiations were underway to establish agreements at Motheo. Employees at our head office are engaged on individual contracts.
- Providing mandatory Code of Conduct and site induction training to all employees.
- Providing access to grievance mechanisms, including an external whistleblowing service for our employees, contractors, and their family members to raise concerns of actual or suspected misconduct in the workplace.
- Requiring all employees and contractors to undertake a pre-employment medical assessment to establish baseline health standards for hearing, respiratory function and overall well-being.
- Providing free access to an Employee Assistance Program for employees and their families.

We are committed to ensuring our people understand their responsibilities when it comes to human rights. In 2022 we delivered modern slavery training to employees working within the legal and procurement teams across our global operations.

In our FY22 Statement, we committed to delivering modern slavery training to the broader workforce during FY23. This training was delayed as the company paused programs to refresh its Purpose and Strategy, and will be a high priority for FY24 with human rights and modern slavery awareness training to be provided to key personnel.

#### Contract workers

We engage contracting companies to undertake large packages of work such as mining, haulage, camp and facilities management. These contractors provide personnel who work on our operational sites.

We also engage labour-hire workers directly or via third parties when there is a short term need to backfill permanent positions.

All contracting personnel and labour-hire workers are subject to the same working conditions as Sandfire employees. Everyone who works on our sites is covered by a health and safety management system (HSMS). We require contracting companies who have been engaged to undertake high risk work to have a HSMS in place which is compliant with Sandfire's standards. For all other companies, personnel will perform work in accordance with Sandfire's HSMS.

#### Our supply chain

There is potential for us to contribute to, or be directly linked to, modern slavery within our operations.

Our standard contract terms and conditions for Australia and Botswana include modern slavery clauses that require suppliers to ensure their personnel and supply chains do not engage in conduct that would constitute an offence under modern slavery laws. It also requires suppliers to notify us if an instance of modern slavery is identified within their organisation or supply chain. The clause is a mandatory requirement of all new contracts and purchase orders.

During 2023, our legal team commenced a detailed review of the critical clauses for our MATSA contracts. The team are monitoring the EU's Proposed Directive on Corporate Sustainability Due Diligence (CSDD) which will require companies to undertake human rights and environmental due diligence and to publish a plan to identify and address violations across the supply chain.

To understand the risk of modern slavery with a particular supplier, we identify suppliers and/or products that have a higher risk of modern slavery.

We issue a modern slavery questionnaire to suppliers as part of the tender process for Motheo and Australia. The questionnaire is designed to determine the level of risk, based on the supplier's country of origin, business dealings, the procurement category, the nature of the supplier organisation and the supplier's response to forced labour indicator questions. Further action is taken for suppliers who are identified as high risk, with the action dependent on the severity and potential impact of that risk. If the risk is too high and not manageable, alternative suppliers are sought.

In our FY22 Statement, we committed to engaging third parties to undertake audits of high-risk suppliers. This commitment required further scoping and was postponed. When this commitment was made, we were transitioning to become a global mining company with the construction of Motheo and the acquisition of MATSA.

In FY24 we will install third party due diligence software to assist in the identification and mitigation of risks associated with our supply chains. Implementation commenced in Australia during the year, however data issues prevented a full roll-out. We are assessing whether the selected application is the best solution for our global operations.

We are enhancing our global due diligence processes for high-risk suppliers and will undertake third party audits in FY24. The due diligence process will include undertaking a desk top assessment to identify higher risk suppliers and then issuing them with a Self Assessment Questionnaire (SAQ). Responses will assist us in determining which suppliers require additional monitoring, assistance and reporting. This process will also determine which suppliers may need to be third party audited. Our Modern Slavery Roadmap, on pages 4-5, includes a commitment to undertake two audits by 31 December 2024.

### Shipping

The copper concentrate we produce is shipped to customers around the world. There is the potential for us to be directly linked to modern slavery through shipping as the sector is exposed to serious human rights concerns.

Our shipping agreements for Motheo, and historically for DeGrussa, require vessel owners to provide us a guarantee that the terms and conditions of their employment agreements with vessel crews are aligned and acceptable to the International Transport Workers' Federation's guidance on seafarers' contracts.

In Spain, our customers take ownership of MATSA's copper concentrate at the Huelva Port. We have identified this as an area of potential risk and where further investigation is required.

### Community

Whilst mining has the potential to provide significant economic benefits to the community, it can also be associated with adverse socioeconomic, cultural, health, and human rights impacts on nearby communities. Each of our operations work in partnership with their local communities to mitigate adverse impacts and to maximise benefits.

We have community relations teams at each site who are responsible for community engagement. We are committed to building open, transparent and meaningful relationships with our communities.

Each asset has its own local community grievance mechanisms.

### Business development and growth

We assess human rights risks and impacts as part of our due diligence process when considering business opportunities, including mergers and acquisitions.

We also assess the potential for human rights risks and impacts during the feasibility assessment of new projects. If there is a likelihood of negative human rights impacts because of our presence and activities, a Human Rights Impact Assessment will be undertaken by a human rights specialist.

In FY23, we completed a Human Rights Impact Assessment for the development of Motheo. The assessment found our activity has the potential to impact the right to work, right to an adequate standard of living, right to housing, and right to water and clean sanitation.

Additional details on the findings of the assessment and our mitigation measures are summarised in the table below. We disclose more information on our mitigation measures in our FY23 Sustainability Report available at <https://www.sandfire.com.au>.

#### Motheo Human Rights Impact Assessment Summary

Activity	Human rights impact	Remediation and mitigation measures
Resettlement activities because of the development of the Motheo Project	Potential to impact: <ul style="list-style-type: none"> <li>• Right to work</li> </ul>	Resettlement Action Plan
Loss of employment as an indirect impact due to the sale of Farm 111-NL	<ul style="list-style-type: none"> <li>• Right to an adequate standard of living</li> <li>• Right to housing</li> </ul>	Monitoring and evaluation of livelihood restoration activity Access to grievance mechanism
Dewatering of the mine in the context of nearby farmers being reliant on groundwater for commercial and personal use	Potential to impact: <ul style="list-style-type: none"> <li>• Right to water and clean sanitation</li> </ul>	Regional quality monitoring program Independent Water Stewardship Committee Access to grievance mechanism





Case Study

Modern slavery and renewables

Our emissions reduction targets

**Net zero emissions by 2050**

**Reduce GHG emissions by 35 per cent by 2035**

**Source 50 per cent of electrical energy from renewables by 2030**

There is extensive evidence linking renewable energy supply chains, in particular those for solar panels, to modern slavery. As we work to decarbonise our operations, we will need to procure renewables and/or partner with companies that will provide power from renewables under contract to us.

In our FY23 Sustainability Report, we announced our plans to install solar facilities at both our Motheo and MATSA operations. To limit the risks of modern slavery in renewables procurement we will:

- Strengthen our contract clauses.
- Collaborate with peers and governments to share knowledge, identify risks and develop actions to address risks.
- Increase due diligence, particularly during the tendering and on-boarding process.

As part of the tendering process, suppliers will be asked to demonstrate how they manage the risks of modern slavery, including providing details on:

- Sustainability and human rights governance frameworks including policies, standards, and details of any public commitments.
- Human rights due diligence processes.
- Results of audits or verification activities.
- Grievance mechanisms.

Sustainability related criteria will be used to assess the tenders.

Our contracts have standard modern slavery clauses. The contract for the awarded work will include advanced modern slavery clauses that will require ongoing monitoring of the supplier during the contract period.



Case Study

Ghanzi Horticulture Project – Gender Based Violence Prevention Support Centre

In FY24, our Motheo team will launch the Ghanzi Horticulture Project in partnership with the Botswana Gender Based Violence Prevention and Support Centre.

This project is an economic empowerment initiative to support victims of gender-based violence.

The Ghanzi Region has the highest number of gender-based violence cases in the country.

This issue is exacerbated by high incidences of poverty, ill health and inequality. The project will provide vulnerable women in the community with employment and training to grow and sell vegetables. The project will address malnutrition and provide a source of income.



## Remediation

We are committed to remediating adverse human rights impacts that we may inadvertently cause or contribute to.

During FY24 we will enhance our remediation processes to align to Walk Free's Response and Remediation Framework and the UNGPs advice for implementing the UN's Respect and Remedy Framework. This Walk Free framework was developed in collaboration with the Human Rights Resources and Energy Collaborative (HRRES) and the UNGC.

Sandfire is now a member of both these groups. The framework provides guidance and practical steps to assist a company with its response to an instance of modern slavery or identified exploitation.

Remediation actions need to be context specific, and we will use the Framework to inform our policies and procedures, and develop supplementary guidance if required.



### Sandfire's Ethics Line

We have an independent and confidential issues raising service, which can be used to report breaches or to raise concerns for those who do not feel comfortable using internal channels.

Ethics Line is operated by an independent third-party provider and is a confidential service which can be used by employees, contractors, suppliers and community members to report any issues related to Sandfire's people or business conduct. Reports may be made anonymously and are treated as strictly confidential.



The Sandfire Ethics Line is available 24/7 & is accessible online, via phone (**free call**).

**+61 251 142 052**

and in multiple languages.



You can access

<https://sandfire.integrityline.com>

to place a report or find additional information.

## Collaboration

Collaboration with stakeholders, including suppliers, investors, government, communities, NGOs, customers and peers, is critical if the world is to address the risks and impacts of modern slavery.

The feedback we receive from stakeholders facilitates a process of continual improvement, and our participation in various forums and industry groups allows us to share our learnings with others and improve our own performance.

This Statement, together with other means of formal and informal communication, including regular engagement with investors and our Annual General Meeting, provide mechanisms for us to disclose and seek feedback on our performance in this area.

Our website, [www.sandfire.com.au](http://www.sandfire.com.au), includes a dedicated human rights page outlining our commitment to upholding and respecting human rights.

Our Sustainability and Procurement teams led the development of this statement and directly consulted with key functions across the business to draft the statement, including at our assets. Drafts of the statement were reviewed by Sandfire's Human Rights Steering Group, established post June 2023.

### United Nations Global Compact

In FY23 we became a signatory to the United Nations Global Compact, the world's largest corporate sustainability initiative. Our 2023 Sustainability Report states our ongoing commitment to report progress towards the implementation of the United Nations Global Compact principles, including those addressing human rights.

This year we joined the UNGC's Modern Slavery Community of Practice (COP), which supports companies across industries to engage, share knowledge, work towards best practice and encourage innovation.

### Human Rights Resource and Energy Collaborative

We have joined the Human Rights Resources and Energy Collaborative (HRREC), which provides a mechanism for the mining, energy and resources sector to share knowledge and refine best practices for the management of modern slavery risks. Our recently appointed Chief Sustainability Officer was a founding member of this group.



# Assessing effectiveness

Sandfire considers an effective response to modern slavery as one where potential and actual risks of modern slavery are identified to prevent and mitigate human rights violations, including modern slavery. We are working to drive changes in behaviour and practices across our business, our supply chain and in the community.

We track our effectiveness in a number of ways:

- Tracking performance against our strategy, commitments and yearly action plans.
  - Reviewing external assessments of our modern slavery disclosures.
  - Seeking feedback from a range of stakeholders including investors, communities and NGOs.
  - Reviewing and assessing business risks and potential impacts on a regular basis, including when the business changes. We assess our operations for human rights risks, including the risk of modern slavery in our supply chain, as part of our enterprise risk management process.
- Qualitative measures and impacts are beneficial to measure effectiveness and we have identified key metrics to demonstrate performance in our Modern Slavery Roadmap. We will report against these metrics in future statements. The outcomes of tracking our effectiveness informed the development of the the FY 24/25 road map detailed on pages 4 to 5.

Key component of our response	How we assess our effectiveness	Key outcomes in FY23
Policy and governance	<ul style="list-style-type: none"> <li>Regularly review and update our policies and standards.</li> <li>Monitor implementation of our policies and standards.</li> </ul>	<p>Human Rights Policy updated as a result of our policy review.</p> <p>A further enhancement of our global human rights framework will be prioritised in FY24.</p>
Strategy	<ul style="list-style-type: none"> <li>Development of long-term strategy with clear and measurable targets.</li> <li>Progress against targets and commitments.</li> </ul>	<p>We recognise the need to develop a long-term strategy, and for the program of work to be adequately resourced and integrated into other business processes.</p> <p>This will be a priority for FY24 and beyond and will be supported by the recent appointment of the Group's first Chief Sustainability Officer.</p>
Due diligence and remediation	<ul style="list-style-type: none"> <li>Number of suppliers screened by our third party system.</li> <li>Number of SAQs issued and completed.</li> <li>Number of suppliers with monitoring plans.</li> <li>Number of risk assessments undertaken.</li> <li>Number of grievances received.</li> <li>Improvements made to our systems and processes because of the grievances received.</li> <li>Number of issues being raised through other channels.</li> </ul>	<p>We did not complete the roll out of our screening tool. This is a priority for FY24.</p> <p>We did not receive any supplier modern slavery related grievances in FY23. We will review the grievance mechanism to ensure it is appropriate, easily accessible and adequately promoted.</p>
Training and competency	<ul style="list-style-type: none"> <li>% of employees who have completed relevant training.</li> <li>Feedback received from training sessions.</li> </ul>	<p>Modern slavery training was paused in FY23. Sandfire's commitment to human rights was covered in the Code of Conduct training.</p> <p>This will be a priority for FY24 and beyond.</p>
Systems and technology	<ul style="list-style-type: none"> <li>The availability of data to assist with analysing Tier 2 suppliers and beyond.</li> <li>The appropriateness of systems to assist with detecting suppliers who have been implicated in previous modern slavery incidents or human rights impacts.</li> </ul>	<p>Gaining insight into our supply chain beyond our direct suppliers can be challenging with the systems being used. Alternative systems are being investigated.</p>
Collaboration and engagement	<ul style="list-style-type: none"> <li>Number of meetings attended.</li> <li>Reviewing external assessments of our modern slavery disclosures.</li> </ul>	<p>In FY23 we joined the UNGC and now participate in their Human Rights Community of Practice.</p> <p>In FY24 we will join the HRREC to participate in knowledge sharing and engage with best practices for the management of modern slavery risks.</p> <p>We established Sandfire's Internal Human Rights Steering Group (HRSG).</p>



We are working to **drive change** in behaviour and practices across our business, our supply chain and in the community.



## Appendix 1 - Modern Slavery Act content index

Requirement	Location
Identify the Reporting Entity.	Page 1, 10 and appendix 2
Describe the Reporting Entity's structure, operations and supply chains.	Page 1, 10 and appendix 2
Describe the risks of modern slavery practices in the operations and supply chains of the Reporting Entity and any entities it owns or controls.	Page 16 to 21
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.	Page 22 to 25
Describe how the Reporting Entity assesses the effectiveness of these actions.	Page 28
Describe the process of consultation on the development of the Statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the Statement).	Page 27
Any other information that the Reporting Entity considers relevant.	Human rights governance, page 14 to 15 Our road map, page 4 to 5



## Appendix 2 - Our 2023 reporting entities

This Statement is made on behalf of Sandfire Resources Limited (ABN 55 105 154 185), the Australian listed ultimate parent company of the Sandfire Resources Limited listed company structure, as well as the following entities:

Entity	Description
EMEA (BIH) Pty Ltd (ACN 637 944 597)	Holding company for Bosnia & Herzegovina exploration entity
MOD Resources (Botswana) Pty Ltd (ABN 73 120 820 028)	Holding company of MOD Resources Botswana (Pty) Ltd
Sandfire Australia Holdings Pty Ltd (ABN 94 649 757 111)	Holding company of Sandfire Australia PL
Sandfire Australia Pty Ltd (ABN 92 649 757 102)	Provides treasury support to Sandfire Resources (ES),S.L.U
Sandfire BC Holdings (Australia) Pty Ltd (ACN 601 379 846)	Holding company for Canadian and American assets, including Black Butte
Sandfire Resources Botswana Pty Ltd	Holding company of Metal Capital Ltd, Metal Capital Exploration Ltd and MOD Resources (Botswana) Pty Ltd
Sandfire Resources Limited (ABN 55 105 154 185)	Australian ASX Listed ultimate parent company
Sandfire Spain Holdings Pty Ltd (ABN 19 652 903 181)	Australian holding company for European investments
Metal Capital Exploration Limited	UK parent company of Tshukudu Exploration (Pty) Ltd and Trans Kalahari Copper Namibia (Pty) Ltd
Metal Capital Limited	UK parent company of Tshukudu Metals Botswana (Pty) Ltd
Sandfire Spain Holdings Limited	UK holding shareholder company of Sandfire Resources (ES),S.L.U
Sandfire Spain UK Limited	Holding company for Spanish and Portuguese Investments
Sandfire BC Holdings Inc	Majority shareholder of Sandfire Resources America Inc.
Sandfire Resources America Inc.	Canadian TSX listed company including Black Butte Copper
Tintina Montana Inc. (USA)	US company that owns the Black Butte project

