

MODERN SLAVERY STATEMENT FY2022



This Modern Slavery Statement for the Atlas Group is made pursuant to section 14 of the *Modern Slavery Act 2018 (Cth)* for the financial year 1 July 2021 - 30 June 2022.



Contents

The Reporting Entity	3
1 About Atlas: Structure, Operations and Supply Chains	4
1.1 Structure	4
1.2 Operations	4
1.3 Atlas workforce	4
1.4 Traditional owners.....	4
1.5 Philanthropy.....	4
1.6 Supply Chain	5
1.7 Location of suppliers	5
2 Modern Slavery Risks	6
2.1 Modern Slavery risks in operations.....	6
2.2 Modern Slavery risks in supply chain	6
3 Actions taken to address risks	7
4 Assessment of the effectiveness of actions taken	8
4.1 Reporting year effectiveness assessment	8
4.2 Opportunities for improvement	8
5 Actions planned for the next reporting period	9
6 Consultation	10
7 Relevant Information	10

Modern Slavery Statement FY2022

The Reporting Entity

Atlas Iron Pty Ltd ACN 110 396 168 (ABN 63 110 396 168) is the **reporting entity** as defined in the *Modern Slavery Act 2018* (Cth).

Atlas Iron Pty Ltd is an Australian entity and has consolidated revenue in excess of \$100 million during the 1 July 2021 to 30 June 2022 reporting period.

This Modern Slavery Statement (**Statement**) is made by Atlas Iron Pty Ltd.

In this Statement, any reference to **Atlas or the Atlas Group** means Atlas Iron Pty Ltd and its subsidiaries. Further details of Atlas Iron Pty Ltd's material subsidiaries are outlined in Atlas Iron Pty Ltd's Annual Report for 2022.

Atlas is committed to the highest standards of conduct and ethical behaviour in all its business activities. Atlas seeks to maintain a work environment that promotes honest and ethical behaviour, corporate compliance, and good corporate governance.

In line with its obligations under the law, Atlas is committed to achieving and ensuring ethical behaviour in its business and with those suppliers with whom it contracts.

Atlas recognises the effects of Modern Slavery and how serious exploitation, substandard working conditions, or under payment of workers are illegal practices and harmful.

Atlas opposes the use of Modern Slavery practices and is committed to addressing, as best it can, the risk of Modern Slavery occurring in its operations or by its suppliers

Atlas expects its suppliers and contractors to adhere to the same high standards in their own operations. Atlas expects its suppliers and contractors to ensure that they are not, in any way, involved in Modern Slavery.

Atlas acknowledges that Modern Slavery risks may exist in its supply chains and operations and is committed to working to identify and as best it can, rectify any Modern Slavery instances.



Modern Slavery Statement FY2022

1 About Atlas: Structure, Operations and Supply Chains

1.1 Structure

Each Australian registered member of the Atlas Group is a proprietary limited company. Further details of Atlas Iron Pty Ltd's material subsidiaries are outlined in Atlas Iron Pty Ltd's Annual Report for 2022.

Atlas Iron Pty Ltd is 99% owned by Redstone Corporation Pty Ltd, a wholly-owned subsidiary of Hancock Prospecting Pty Ltd and 1% owned by Marubeni Iron Ore Australia Pty Ltd.

Atlas' corporate structure is made up of the Atlas Board, Chief Executive Officer and leadership team members covering key areas of operations, development, sales, finance and governance.

1.2 Operations

Atlas is an Australian owned iron ore company; mining and exporting direct shipping ore (DSO) from its operations in Western Australia's Pilbara region. Atlas size and blend ore to the required specification and haul to Port Hedland for export.

Atlas' key operating sites within the Pilbara are Mt Webber, Sanjiv Ridge, and Miralga Creek. Atlas also operates a number of projects in the development stage.

Atlas' operational activities are undertaken in an owner-contractor arrangement, where Atlas engages experienced contractors to perform drilling, blasting, excavating, processing, hauling and exporting activities for the duration of the mine's life. The partnerships formed enable Atlas to build strong relationships with its contractors and be agile in its mining activities, resulting in exports in excess of 9 million tonnes of iron ore per annum.

Atlas' principal place of business and its registered office is Level 17, 300 Murray Street Perth WA 6000.

1.3 Atlas workforce

As at 30 June 2022, the Atlas Group has over 200 full time employees.

1.4 Traditional owners

Atlas is proud of its relationship with Pilbara Traditional Owner groups including the Nyamal, Palyku, Kariyarra and Ngarla People. We recognise the connection that Traditional Owners have with the land, and we work with Traditional Owners to develop Aboriginal employment and business opportunities.

1.5 Philanthropy

Atlas administers a program of grants to provide financial boosts to small and community-based non-profit organisations, who operate in the Pilbara at a grassroots level. Atlas also provides grants from time to time to organisations where Atlas employees volunteer in order to support our employees who are actively giving back to the community.

Modern Slavery Statement FY2022

1.6 Supply Chain

The Atlas supply chain covers construction, development, mining, crushing, haulage, shipping and sales to customers. Atlas' supply chain is global, with products and services being obtained from Australia and internationally.

Atlas' procurement and commercial teams are responsible for purchasing goods and services for operations and Atlas' projects teams are responsible for purchasing goods and services for any development projects.

The governance system within Atlas manages risk to the business and reporting against commitments.

Atlas' supply chain covers a broad range of goods and services including:

- Mining, crushing, haulage, port and camp services
- Construction materials
- Consumables and parts
- Fuel
- Freight and shipping
- Equipment hire
- Spare parts
- Clothing
- Labour, recruitment services
- IT software and hardware and mobile telephones

1.7 Location of suppliers

96% of our supplier base is located within Australia, with the remainder located globally. Whilst the majority of Atlas' suppliers are locally operated, Atlas acknowledges that some of these suppliers on-sell goods sourced from other countries.

The table below sets out the percentage of net value spend per country for the financial year ending 30 June 2022.

Supplier Country/Region	% Net Value
Australia	76.089%
Singapore	23.552%
China	0.333%
United Kingdom	0.013%
United States	0.011%
Japan	0.002%
Sweden	0.001%
Panama	<0.001%

Modern Slavery Statement FY2022

2 Modern Slavery Risks

Atlas is not aware of any Modern Slavery practices occurring in its operations or supply chains, however it recognises that there is a risk of Modern Slavery practices occurring in its operations and supply chains.

2.1 Modern Slavery risks in operations

Atlas' operations are located in Western Australia and our employees (who range from engineers, geologists and electricians to administrators, accountants, lawyers and other professionals) are paid in accordance with Atlas' remuneration and recruitment policies and any award applicable to that employee's job type.

At 30 June 2022, around 40% of Atlas employees worked on a fly-in fly-out (**FIFO**) basis. Most employees of Atlas' mining, crushing, haulage and camp services contractors also work FIFO. Atlas understands the challenges that face FIFO workers, and works hard to support its FIFO workers. Atlas ensures that on-site accommodation is of a high quality and invests time in supporting staff to make smart health, social and safe choices.

All Atlas and contractor employees (and their partners and dependents) have access to free counselling through the Atlas BSS employee assistance programme. Flu vaccinations are also made available for free to all employees and key site contractors

Atlas also offers its employees training and career enrichment programmes.

These policies and protections, combined with Australia's low ranking in the Global Slavery Index, mean that Atlas considers that the risk of Modern Slavery occurring in its operations is low. Atlas does however recognise that it is still possible for instances of Modern Slavery to occur and that it must ensure its practices and procedures are such as to recognise and deal with any possible instance of Modern Slavery.

2.2 Modern Slavery risks in supply chain

Atlas continues to recognise that there are risks of Modern Slavery occurring in its supply chains, particularly because it acquires goods and services from high risk industries (such as garments, electronics, construction and shipping) and suppliers located in higher risk countries. Atlas is also aware that supply chains are complex and that it has limited visibility beyond its direct suppliers, which contributes to the risk of Modern Slavery instances occurring.

Modern Slavery Statement FY2022

3 Actions taken to address risks

Atlas has continued its review of Modern Slavery risks from the preceding year.

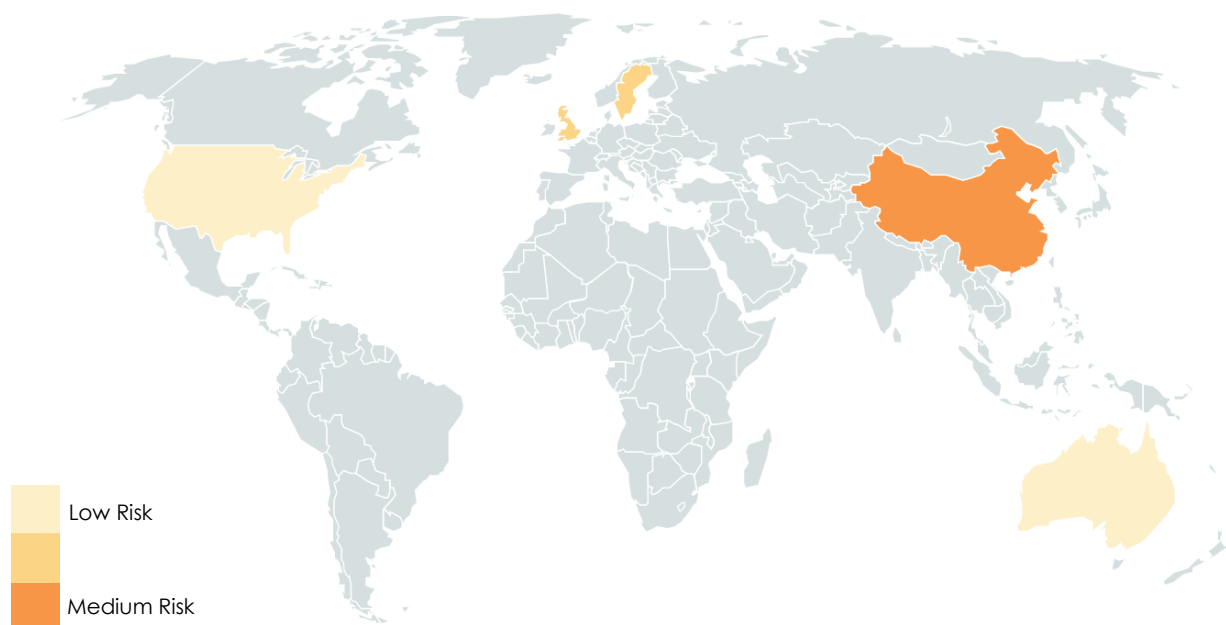
In doing so, Atlas has:

- Continued promoting awareness of Modern Slavery risks to suppliers;
- Broadened the suppliers surveyed on the basis of spend, industry, and location;
- Reviewed its policies and procedures to ensure they are appropriate and Modern Slavery risks are mitigated; and,
- Imbedded due diligence and 'know your supplier' processes within supplier onboarding, through incorporation of a Modern Slavery section in the standard pre-qualification questionnaires.

As the greatest chance of Modern Slavery incidents occurring lie within Atlas' supply chain, Atlas took the following steps to measure and address any risks:

- Reviewed Supplier spend data based on industry and location, expanding the materiality threshold to \$1m;
- The identified suppliers were requested to complete a Modern Slavery questionnaire; and,
- Reviewed responses.

This reporting period saw the survey request increase from 13 identified Suppliers to 30. There was a great improvement in response which has more than doubled from the previous year from 5 to 11 responses received.



Atlas Supplier Modern Slavery Geographical Risk Profile

Atlas reviewed the geographical locations of our supply chains, and whilst all are deemed relatively lower risk on the Global Slavery Index, Atlas is committed to the ongoing mitigation of any potential Modern Slavery Risks occurring. This commitment will be a cycle of continuous improvement over the subsequent years.

Modern Slavery Statement FY2022

4 Assessment of the effectiveness of actions taken

4.1 Reporting year effectiveness assessment

Atlas has reviewed the effectiveness of its attempts to reduce the occurrence of Modern Slavery within its operations and supply chains. The results of the actions taken this reporting year are as follows:

- Atlas did not identify any suppliers or contractors engaging in activities relating to modern slavery that required remediation in the reporting period. The supplier questionnaires continued to be an effective tool for identifying potential Modern Slavery risks in our operations and supply chain.
- Atlas did not receive any whistleblower reports or other or complaints relating to Modern Slavery at our operations or in our supply chains.
- Atlas' policies and procedures were adequate to address the requirements of the Modern Slavery Act.
- Modern Slavery qualification questionnaires provided visibility within the supply chain of any potential Modern Slavery Risks.
- Ongoing review of our Modern Slavery clauses within contract agreements to ensure relevance and fit for purpose.

4.2 Opportunities for improvement

Atlas endeavours to undertake all actions set out by the previous Statement, and further recognises the need to continuously review and reassess its actions in order to find further opportunities for improvement. Atlas recognised the following opportunities for improvement this reporting year:

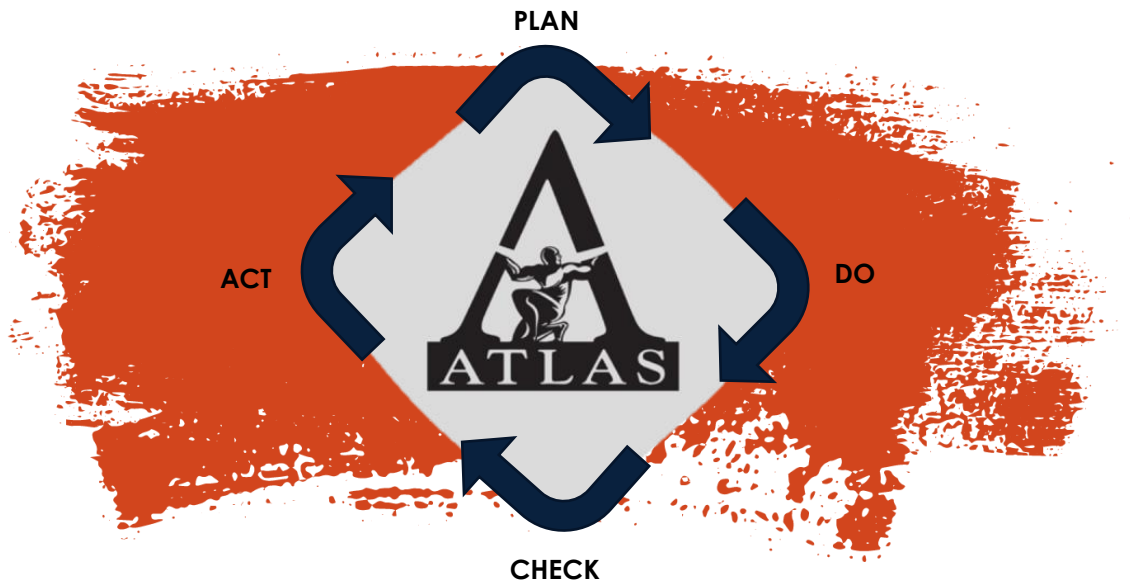
- Atlas has focussed on educating key representatives within the business on modern slavery risks, and recognises there is an opportunity to further educate those representatives and deepen their understanding of those risks in the next period, which will further improve Atlas' ability to identify and respond to those risks;
- We recognise there is a need to monitor and review the Atlas Modern Slavery Management Framework to ensure it is fit for purpose, compliant and relevant;
- There should be a concentrated effort on fewer suppliers or goods which may be deemed potentially high-risk further down the supply chain, rather than a high-level, holistic approach of review; and,
- Fostering greater collaboration with Atlas' sister-companies with respect to Modern Slavery processes, initiatives and improvements.

Modern Slavery Statement FY2022

5 Actions planned for the next reporting period

Upon review of the progress made this reporting year and the opportunities identified for improvement, Atlas seeks to undertake the following actions for the next reporting period:

- Review its Modern Slavery Management Framework;
- Continuing Modern Slavery Training through its key representatives;
- Prioritise and focus its review on potential high-risk suppliers or goods (e.g. electronic goods, rubber, clothing);
- Embed Modern Slavery processes within subcontractor approvals; and,
- Continue to progressively monitor operations and suppliers for any instances of Modern Slavery Risks.



Modern Slavery Statement FY2022

6 Consultation

Atlas operates as an integrated group, with shared management. Policies, processes and systems apply consistently to all members of the Atlas Group. Teams across key parts of the Atlas business have been consulted and have had input into this statement (and the formulation of the Atlas Group approach to Modern Slavery risks).

This statement was reviewed by Atlas' Chief Executive Officer, Chief Financial Officer and Manager - Legal.

7 Relevant Information

Atlas representatives have attended (and will continue to attend) seminars conducted by private presenters on Modern Slavery as well as having regard to materials produced by Border Force. Atlas will continue to keep apprised with Modern Slavery developments, the Global Slavery Index reports and strive for best practice in relation to, as best it can, identifying, dealing with, and eradicating instances of Modern Slavery.

This statement was approved by the Board of Atlas Iron Pty Ltd.

Handwritten signature of Spiro Pappas in black ink.

Spiro Pappas
Chairman

Handwritten signature of Sanjiv Manchanda in blue ink.

Sanjiv Manchanda
Chief Executive Officer