

Modern Slavery Statement 2024



Acknowledgement of Country

Pilbara Minerals acknowledges the Nyamal and Kariyarra People of the Pilbara, the Whadjuk Noongar People of the Perth region and all Aboriginal and Torres Strait Islander peoples who are the Traditional Owners and First Peoples of these lands. We pay respect to their Elders past and present and acknowledge their continuing connection and care for the land, water and Country.

About this statement

This Modern Slavery Statement (the Statement) is made by Pilbara Minerals Limited, on behalf of all reporting entities set out in Appendix B, in accordance with the Australian *Modern Slavery Act 2018* (Cth) for the financial year ending 30 June 2024.

Unless expressly stated otherwise, references to 'the Company', 'the Group', 'we,' 'us' and 'our' refer to Pilbara Minerals Limited and its controlled entities.

POSCO Pilbara Lithium Solution Co Ltd, an incorporated joint venture which is not operated or managed by Pilbara Minerals, is not covered by this Statement, unless otherwise stated. However, this Statement broadly describes our approach to managing the risks of modern slavery practices and our actions taken to ensure alignment of values with our non-operated joint venture.

All dollar amounts are in AUD unless otherwise stated. Some metrics may be rounded and may not add up to the 100% or the reported total.

The Statement in its entirety was approved by the Pilbara Minerals Board on the 25 November 2024 on behalf of all reporting entities and signed by the Managing Director and Chief Executive Officer. This report was published on 10 December 2024.

This Statement complements our full 2024 disclosure suite.

To gain a comprehensive view of our sustainability performance see our website <https://pilbaraminerals.com.au/reporting-disclosures/>

Pilbara Minerals welcomes feedback on this Statement. For further information or to submit comments, please contact sustainability@pilbaraminerals.com.au.



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Message from the
Managing Director and CEO

Pilbara Minerals recognises the challenge of combatting modern slavery in today's world.



Pilbara Minerals is committed to operating honestly and ethically, and always respecting the rights of our workforce and local communities. We recognise that as we grow, robust governance and due diligence processes are critical to upholding our commitments to human rights and supporting positive change across our supply and value chains. At Pilbara Minerals, we understand that addressing these complex issues requires collective action.

During FY24, we made significant advances by enhancing our modern slavery risk management approach. While we have made positive strides, we acknowledge there's always more work to be done. We remain committed to ongoing improvements and transparency in our efforts to respect human rights and eliminate modern slavery.

Understanding it is a joint effort across our sector and community, we will continue to advocate for collaboration among our industry peers to collectively advance ethical practices throughout the lithium value chain.

In FY25, we will be focusing on a comprehensive review of responsible and ethical sourcing as part of our internal audit plan, and strengthening our due diligence and grievance mechanisms.

Dale Henderson
Managing Director & CEO

FY24 progress

- ✓ Expanding our human rights assessment criteria for supplier onboarding
- ✓ Updating our Human Rights Policy and introducing a Responsible Production and Sourcing Policy
- ✓ Joining the UN Global Compact
- ✓ Launching a company-wide modern slavery training module
- ✓ Calling for the establishment and chairing the International Lithium Association's Responsible Production and Sourcing subcommittee

Our sustainability journey



Pilbara Minerals' growth journey has been supported by continuous improvement in sustainability efforts, shaping our path to becoming a leader in driving an ethical and sustainable energy future.

Our operation

Pilgangoora is a world class operation, located 140km south of Port Hedland in the heart of the resource rich Pilbara region in Western Australia.

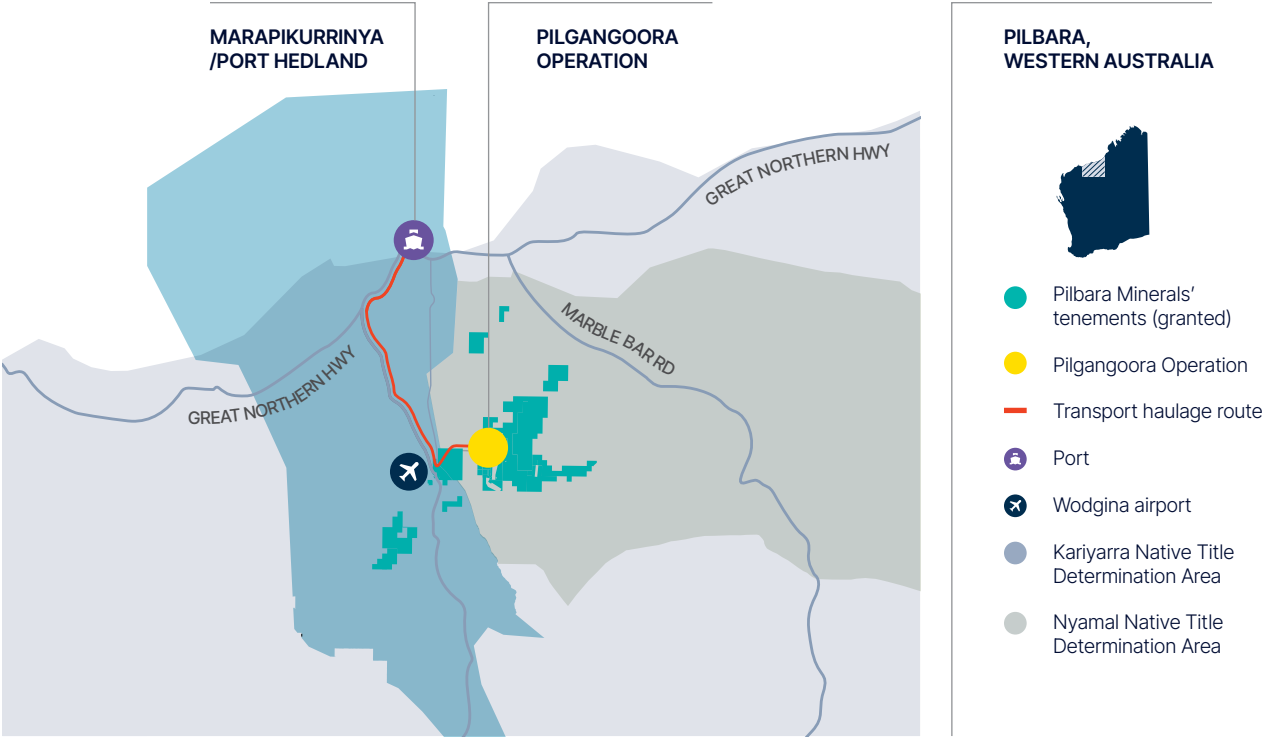
Our Pilgangoora Operation is a well-established, tier one asset with a ~33 year mine life¹, underpinned by strong environmental and safety regulations, and social standards.

Situated on Nyamal and Kariyarra Country, it's the world's largest, independently owned hard rock lithium operation.

We export spodumene concentrate produced at the Pilgangoora Operation from Port Hedland to leading lithium chemical converters, primarily in China. Outside of China, we are participating in South Korea's first lithium hydroxide monohydrate chemical facility in joint venture with POSCO Holdings.

Pilbara Minerals has a joint venture with Australian company Calix Limited for the development of a Mid-stream Demonstration Plant.

➔ **For more information** on Pilbara Minerals' operations, refer to our 2024 Annual Report.



¹ For more information see Pilbara Minerals' ASX announcement "55Mt increase in Ore Reserves to 214Mt" dated 24 August 2023 and the 2024 Annual Report which adjusts this figure for depletion.



GWANGYANG, SOUTH KOREA
 POSCO Pilbara Lithium Solution



LITHIUM SOLUTION

CHINA
 Key offtake partners



MARAPIKURRINYA /PORT HEDLAND
 Pilgangoora Operation

Nyamal and
 Kariyarra Country

BOORLOO/PERTH
 Head office

Whadjuk Noongar
 Country

Our business activities

One of our key strategic pillars is extracting greater value from the battery materials supply chain and diversifying our product and revenue streams.

As part of this strategy, we progressed a number of projects during FY24.

These include:

- Completed construction of Train 1 of the lithium hydroxide monohydrate chemical facility in South Korea, built in joint venture with POSCO Holdings, and first production of lithium hydroxide.
- Commenced a joint feasibility study with Ganfeng Lithium for another potential downstream lithium conversion facility.

In August 2024, we announced the conditional acquisition of Latin Resources' Salinas Lithium Project (Salinas) located in Brazil. Salinas is a tier one, hard rock lithium development project, providing Pilbara Minerals with the opportunity to enter new markets in Europe and North America.

We are committed to upholding our responsible and ethical expectations across all current and future operations.



Group structure

Pilbara Minerals' Group structure is as shown in Figure 1 for the financial year ending 30 June 2024. This Statement outlines the actions and activities of the reporting entities (as set out in Appendix B) during FY24. Additional to the structure below, Pilbara Minerals Limited is a participant in an unincorporated joint venture with Calix Limited. This Statement covers the unincorporated joint venture project and assets.

Figure 1: Group structure

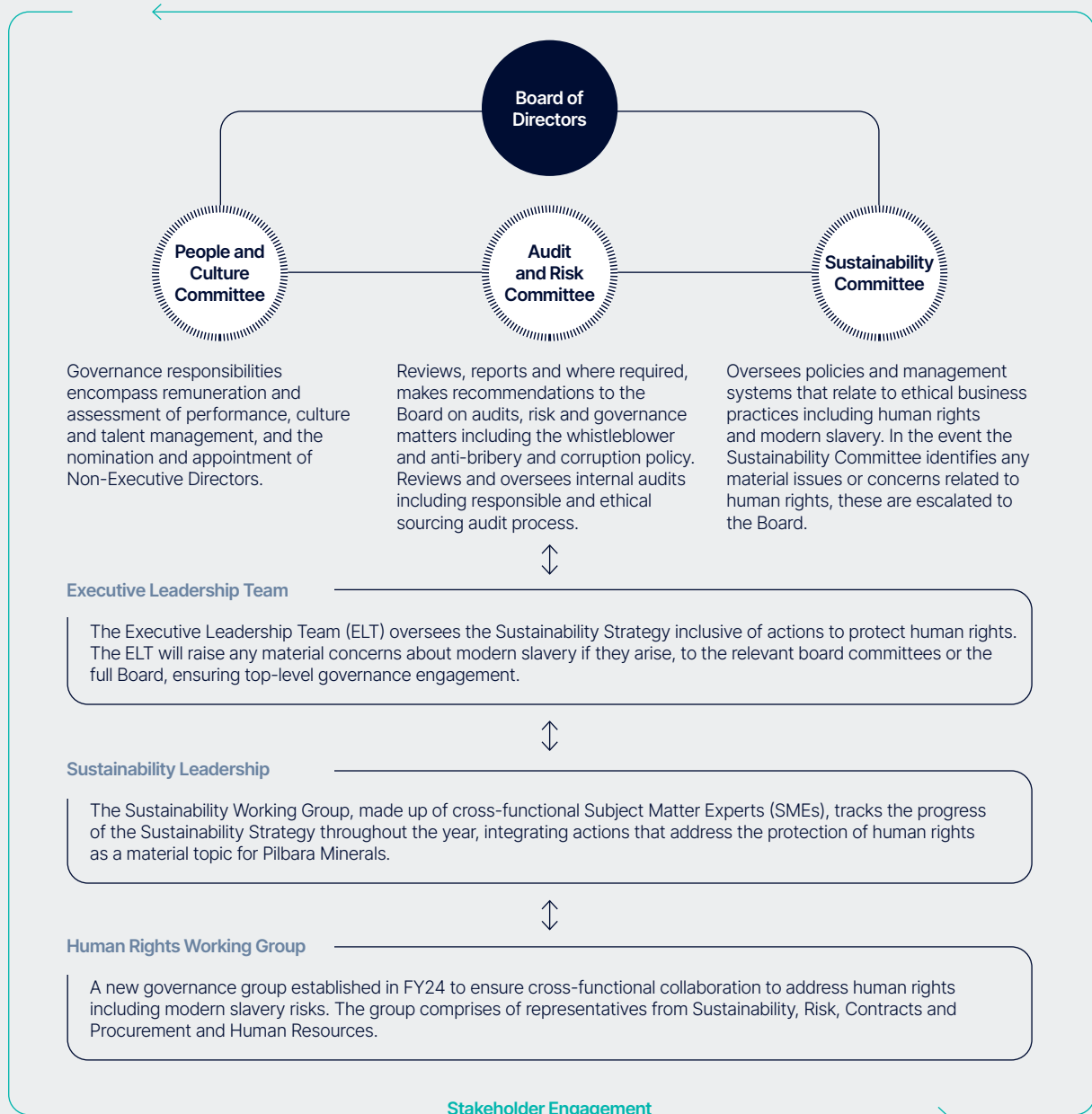


Governance structure

Pilbara Minerals' Board is the Company's governing body and is accountable for human rights and modern slavery risk across our operations and supply chain. The Company's People and Culture Committee, Audit and Risk Committee and Sustainability Committee play critical roles in overseeing and monitoring these risks and the associated management measures.

In FY24, we established and held our inaugural Human Rights Working Group. The working group has been designed to enhance human rights training, raise awareness and strengthen our due diligence processes.

Figure 2: Pilbara Minerals' modern slavery governance



Key policies

At the core of our governance framework are our corporate governance policies, which are approved by the Board. These policies set out expectations and provide a framework to ensure we define, identify and manage modern slavery risks within our operations and supply chains.

➔ For more information refer to our website pilbaraminerals.com.au/policies

All our corporate policies are made available on our website and communicated through various employee and contractor awareness training.

Table 1: Key Pilbara Minerals' policies and procedures

Policy/statement	Purpose
Anti-Bribery and Corruption Policy	Sets expectations to perform and work with honesty and integrity and comply with all applicable laws when dealing with either private individuals or public officials.
Climate Change Position Statement*	Outlines our support for the Paris Agreement and recognises the need for the transition to be executed in an equitable and fair manner that does not leave behind vulnerable communities and workers in accordance with nationally defined development priorities.
Code of Conduct	Aligns with our values and ensures employees, contractors, and business partners are aware of ethical standards, Company expectations and prohibited conduct.
Community and Stakeholder Relations Policy	Establishes a framework for how the Company engages with local communities and other stakeholders, ensuring respect for their rights throughout the engagement process.
Human Rights Policy*	Supports our commitment to upholding human rights. The policy superseded the previous Modern Slavery Policy and aims to broaden our governance over human rights impacts.
Responsible Production and Sourcing Policy**	Established during FY24, this policy outlines our commitments to ethical and responsible sourcing and production practices, including managing human rights, corruption, environmental, climate change and other risks through operations and procurement practices.
Risk Management Policy*	Sets the Company's commitment to identify and manage risk on an ongoing basis, providing a foundation for how human rights risks are raised within established processes for risk management.
Whistleblower Policy*	Outlines protections for those who make disclosures, including confidentiality and safeguards against detriment. Operation and supply chain transparency is enhanced through the implementation of this policy as stakeholders may use the whistleblower mechanism to report concerns about human rights.
Stakeholder Grievance Procedure	Stakeholder grievance mechanisms serve as an early warning system for potential human rights issues and allow our broader stakeholders, including local communities, to raise concerns.

* Policy updated during FY24.

** New policy developed during FY24.

Our workforce

Great people are the core of our activities and the achievements of Pilbara Minerals to date. During FY24, our workforce grew from 768 to 917 employees, representing a 19% increase from FY23.

The proportion of employees who identify as female increased during the reporting period to 23.3%. We have continued to make positive steps towards female representation at senior leadership levels with the appointment of a female Chairman and an additional female appointed to the Executive Leadership Team. Refer to Table 2 for the proportion of female employees across the workforce.

Gender pay equity has improved significantly through FY24 with a reduction in our median gender pay gap on base salary from 25.1% in 2023 to 11.1% in 2024 (based on average

total remuneration as reported in the 2023-2024 Workplace Gender Equality Agency submission).

Gender pay gaps are currently reported from a binary perspective in Australia, for example comparing the average or median earnings of men and women. There is insufficient data for remuneration insights about non-binary and gender diverse communities, however this is something the Workplace Gender Equality Agency is working to address.

Following the completion of our annual remuneration review and audit, we are confident all employees in like-for-like roles (considered based on variables such as relevant experience, competency levels, remuneration market benchmarking, job location and rostered hours worked) are paid equitably. Where

there are any pay differences, these are not based on gender.

The distribution of new hires by age remained stable and largely consistent with FY23, with the biggest demographic being 30 to 39 years. The demographic profile with respect to age is diverse and broad with approximately one quarter of the workforce less than 30 years of age, and another quarter over 50 years of age. We recorded an increase in the representation of Aboriginal and Torres Strait Islander peoples employed from 2.1% in FY23 to 2.8% of the total workforce in FY24.

[➔ For more information refer to the Sustainability Databook 2024.](#)

Table 2: Proportion of female employees across the workforce

	Proportion of female employees	
	FY24	FY23
Board ¹	3 out of 6 (50.0%) ↑	2 out of 6 (33.3%)
Executive positions ²	2 out of 7 (28.6%) ↑	1 out of 7 (14.3%)
Management positions ³	14 out of 51 (27.5%) ↑	10 out of 39 (25.6%)
Whole organisation	214 out of 917 (23.3%) ↑	172 out of 768 (22.4%)

¹ Includes the Managing Director and CEO.

² Executives are categorised as the Company's Executive Leadership Team and includes the Managing Director and CEO.

³ As at 31 March 2024 Workplace Gender Equality Agency (WGEA) reporting date: 1 April 2023 – 31 March 2024, the number of management positions comprised 21 Senior Managers 5 of whom were female.

Our supply chain

We strive to ensure economic benefits flow to local communities from our operation. The supply and procurement process aims, where practical, to provide local suppliers, contractors and businesses owned by First Nations peoples with business opportunities.

In FY24, we procured \$1.6B worth of goods and services from 14 countries and 997 suppliers, as shown in Figure 5 on page 16. Additionally, we spent \$271M across First Nations'

contracts. The majority of our spend was categorised as shipping, software and equipment, spares and goods. Parts procured and manufactured from overseas countries included magnetic separation and mineral processing and sampling equipment, as well as industrial automation and control parts.

Pilbara Minerals does not have any tier 1 suppliers from, or operating in, countries that are ranked 20 or below in Transparency International's Corruption Perception Index¹.

Image: Contractor Qube haul fleet new Volvo FH16 roadtrain with Yindjamarra-wrapped artwork by Wiradjuri and Sydney based artist Darren Charwood. Comissioned as part of Qube's 2023 Reconciliation Action Plan.



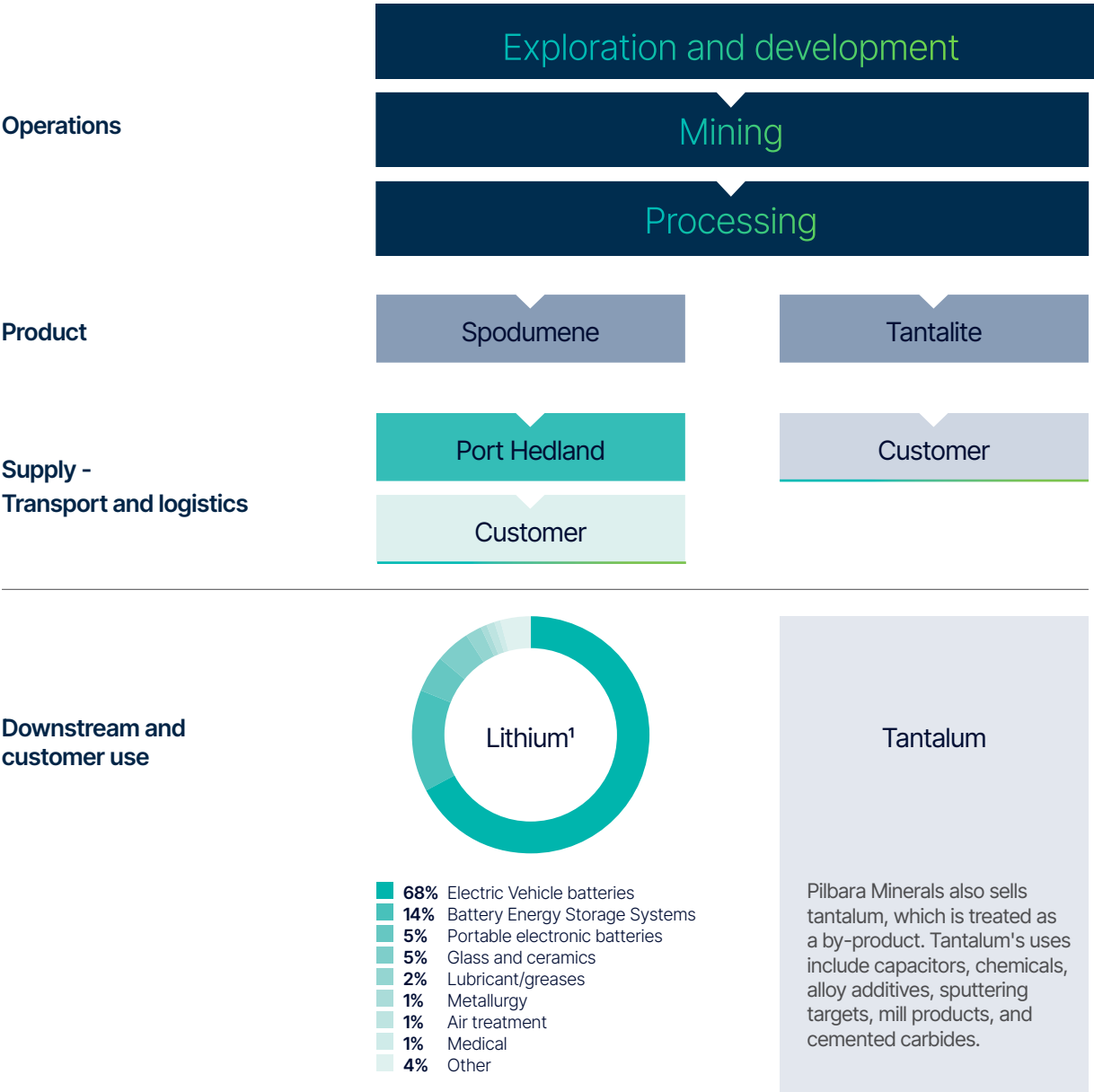
¹ Pilbara Minerals' tier 1 suppliers are those who supply goods or services directly to the Company (refer to page 30 for further details).

Our value chain

Our value chain map is based on five main activities; exploration and development, mining, processing, transport and logistics, downstream and customer use. An overview of Pilbara Minerals' value chain can be seen in Figure 3.

Understanding the value chain enables us to drive operational excellence and manage risks including modern slavery and human rights.

Figure 3: Pilbara Minerals' value chain



¹ Benchmark Mineral Intelligence (2024), Q3 2024 Update: CY2024 end-use sector forecast. Estimated end use percentages do not add up to 100% due to rounding.

Section 2 Identifying modern slavery risks

Identifying modern slavery risks is critical to addressing potential human rights violations within our operations and supply chains.

While we have not identified any instances of human rights violations, including modern slavery, within our operations or supply chain to date, we recognise that such issues can often be hidden within complex supply networks. We understand the importance of continually enhancing our risk identification and due diligence processes and are committed to ongoing improvement.

Our risk identification approach includes:

- Addressing human rights risks by using our Enterprise Risk Management Framework.
- Assessment and consideration of salient human rights issues.
- Evaluating against key factors of modern slavery risks.
- Recognising the continuum of involvement from 'cause' to 'contribute' to 'directly linked'.

The following section provides a more detailed exploration of our risk identification approach.

Risk identification

Pilbara Minerals has an established process to identify, assess, mitigate and manage risks including those associated with modern slavery.

The Company's Enterprise Risk Management Framework (aligned with International Standard ISO 31000:2018), allows employees to proactively identify potential new and emerging risks through a risk register to capture input controls, assign roles and responsibilities, and input actions. Through this framework we develop, integrate and deploy risk management practices into corporate governance and business management processes.

[➔ For more information](#) on our risk assessment processes, including the Audit and Risk Committee, refer to the 2024 Annual Report.

Salient human rights

Pilbara Minerals' salient human rights issues are those that we consider may present the most significant risk of severe negative impact on individuals through the Company's activities, supply chains, and/or business relationships. A high-level assessment of salient human rights issues has identified:

- Rights of First Nations Peoples
- Health, safety and environment
- Labour rights and working conditions
- Inclusion and wellbeing
- Privacy and freedom of expression

This assessment will be regularly updated to remain relevant for the Company.

As operations expand, the importance of on site security personnel will be closely monitored, though it is not currently considered a primary human rights concern.



Key factors of modern slavery risks

There are four factors that elevate the risk of modern slavery occurring as shown in Figure 4. We understand that multiple risk factors have the potential to influence the nature and extent of modern slavery practices, particularly when these factors intersect. By considering these factors, we aim to develop more effective strategies for identification of modern slavery risks and promote responsible business practices throughout our operations, supply chains and business relationships.

Figure 4: Identifying modern slavery risks



The UNGPs

The United Nations Guiding Principles on Business and Human Rights (UNGPs) human rights due diligence framework outlines a process for how companies can identify, prevent, mitigate, and address adverse human rights impacts. By using the UNGPs 'Protect, Respect, Remedy' Framework, we can better identify our involvement in potential human rights issues and respond effectively, ensuring responsible practices throughout our business activities¹.

The 'Cause, Contribute, Directly Linked' continuum is a key part of the UNGPs supporting businesses to understand their relationship to human rights impact and determine appropriate actions. Refer to Table 3 for more detail on Pilbara Minerals' application of the continuum.

Table 3: Application of the UNGPs to Pilbara Minerals' operations and supply chain

Type of impact	Response ²
<p>Cause When a company directly causes an adverse human rights impact through its own actions or omissions.</p>	<p>Pilbara Minerals acknowledges the presence of modern slavery within Australia and recognises that the geographical location of its operation does not exempt the Company from the possibility of modern slavery occurrences. However, the Company assesses the potential likelihood³ of direct involvement through on-site operations as extremely low.</p> <p>Pilbara Minerals will take action to cease or prevent the risk and provide for, or cooperate in, remedying any actual impacts if identified as causing the human rights impact.</p>
<p>Contribute When a company plays a role in human rights abuses, even if it is not the primary or sole cause. A company may indirectly contribute to human rights violations through its business relationships, such as those with suppliers, partners, or clients. While not the sole cause, the company shares a responsibility to prevent or mitigate these impacts.</p>	<p>Pilbara Minerals may indirectly contribute to risks of modern slavery by imposing certain demands on its suppliers (i.e. unrealistic costs and timeframes).</p> <p>Pilbara Minerals will take action to cease or prevent our contribution to the risk and provide for, or cooperate in, remedying any actual impacts as appropriate, using leverage we have to mitigate any remaining risk.</p>
<p>Directly linked When a company has a clear connection to human rights abuses, but the abuse is not directly caused by its actions. Instead, the company's activities are directly linked to the violations, which requires it to address the associated risks and take appropriate steps to prevent or mitigate the impacts.</p>	<p>Pilbara Minerals considers the greatest exposure to modern slavery risks is through the extended value chain, both upstream and downstream. An example where this risk may be evident is when the Company procures manufactured goods where exploitation, such as the use of forced labour, might be hidden within different tiers of the supply chain. This presents challenges in terms of visibility, oversight, and the Company's capacity to bring about remediation.</p> <p>Pilbara Minerals will use leverage to influence the entity causing the risk, consider if the Company should provide for, or cooperate in, remedying any actual impacts as appropriate, and consider disengagement dependent on the circumstances and in line with our Responsible Production and Sourcing policy.</p>

¹ OHCHR (2011), [Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework](#)

² BSR (2021), [Seven Questions to Help Determine When a Company Should Remedy Human Rights Harm under the UNGPs](#)

³ The event is anticipated to occur only under an extremely rare and exceptional circumstance

Operational risk

Australia is considered low risk for modern slavery according to Walk Free's Global Slavery Index 2023, ranking 149 out of 160 countries on modern slavery prevalence with an estimated 1.6 victims of slavery per 1,000 population¹. Risks for the sector more generally relate to the presence of vulnerable groups such as migrant workers, low or unskilled workers and exposure to health and safety risks² and labour providers. We recognise that our exposure to modern slavery directly through our operations is extremely low with a greater risk of exposure within our supply chains, including within Australia. All spodumene and tantalite concentrates produced by Pilbara Minerals originate from Australia and do not contain any "Conflict Minerals"³ from conflict-affected high-risk areas⁴.

Our operational activities include processing, exploration and mining with the majority of spend relating to fleet and equipment hire, site services, mining services (e.g. drill and blast, laboratory, fleet operation and waste removal) and consultancy services. We work closely with contractors to ensure compliance with our Code of Conduct and that they act in accordance with Australian law.

We have an in-house recruitment function and work with reputable external recruitment agencies for specialist roles. The Company covers all costs of recruitment activities.



Responsible mining

Pilbara Minerals has completed an Initiative for Responsible Mining Assurance (2018) IRMA self-assessment across critical criteria and engaged an IRMA-accredited auditing firm to conduct a third party review in FY24. The review identified 30 of the 40 critical criteria as applicable in accordance with IRMA guidance.

The recommendations included development of a remediation framework and Voluntary Principles on Security and Human Rights training. Actions to increase

alignment have been incorporated into Pilbara Minerals' action planning and are subject to ongoing monitoring by the Sustainability Team (refer to pages 25-26). Progress on these recommendations is communicated quarterly to the Chief Sustainability Officer and the Managing Director. Additionally, the Board-level Sustainability Committee reviews progress against these initiatives, ensuring high-level oversight and accountability.

¹ Walkfree (2023) [Global Slavery Index](#)

² KPMG (2021), [Resources Energy and Modern Slavery](#)

³ "Conflict Minerals" means cassiterite, wolframite, columbite (coltan), gold and other rare metals mined including gold, tantalum, tin and tungsten derived from any illegal mine of DRC, or illegally taxed on trade routes, either of which are controlled by non-governmental military groups, or unlawful military factions.

⁴ Conflict-affected, high-risk areas (CAHRAs), includes DRC and South Sudan, Central African Republic, Angola, Zambia, Tanzania, Burundi, Rwanda, Uganda and Republic of the Congo.

Supply chain risks

Our suppliers are assessed for higher-risk goods and services, country-specific and commodity-specific risks to determine significance through our human rights questionnaire and onboarding process. All countries we procured goods and services from in FY24 are considered low-moderate risk and are not in geographies with a high prevalence of sanctions¹. In FY24, 3% of our total spend was overseas.

We understand that human rights impacts can be hidden within different

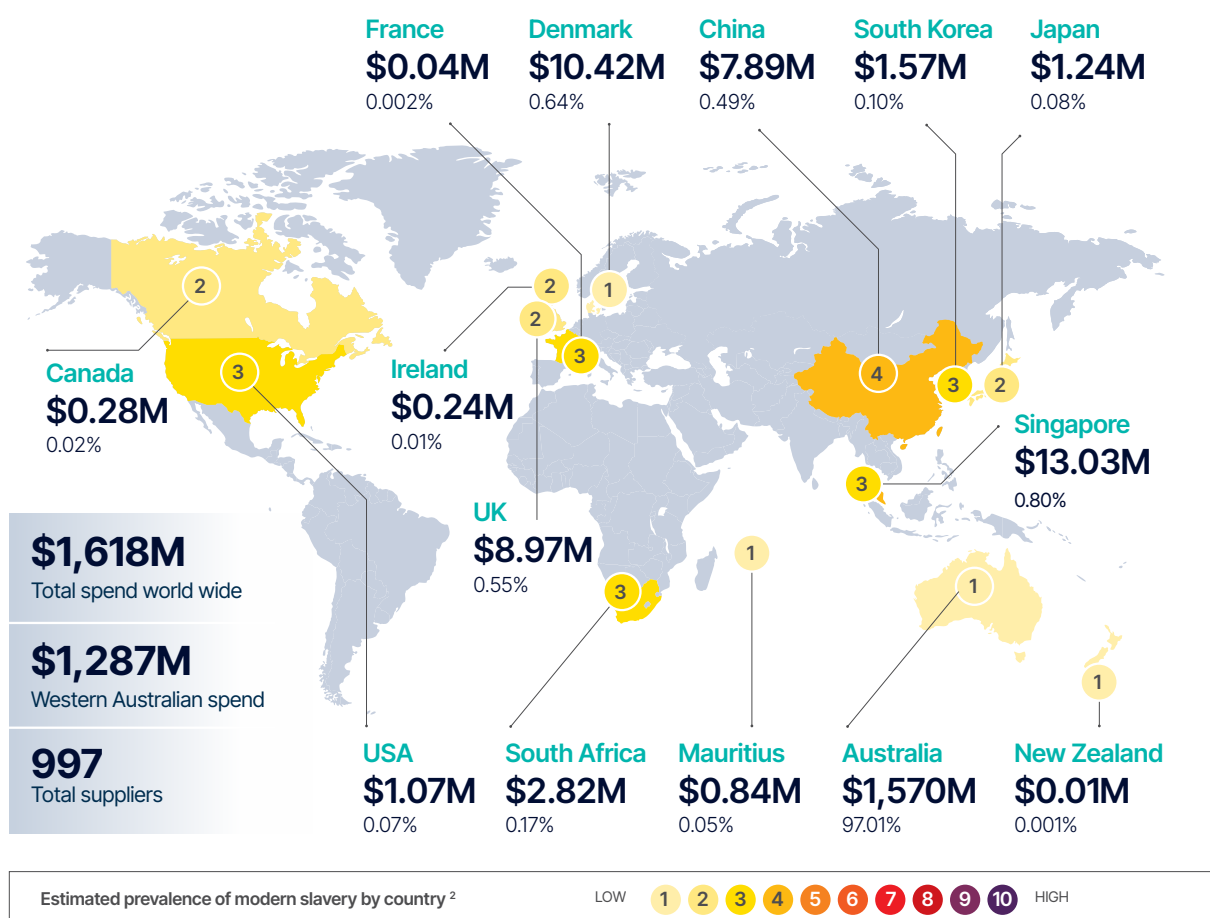
tiers of the supply chain where it is more difficult to detect. Pilbara Minerals continues to assess tier 1 suppliers within the tender and onboarding processes. This will be expanded where possible in FY25 and beyond.

Pilbara Minerals recognises certain industries and products, such as software, manufacturing, garments, shipping and construction sectors, can be associated with greater risk of modern slavery.

Pilbara Minerals is committed to working closely with suppliers that fall within these categories to identify and manage impacts. Additionally, we recognise that our direct tier 1 suppliers may be exposed to increased risks when they source from, or operate in, regions or sectors with a higher prevalence of modern slavery.

We are working to increase awareness of our reliance on these sectors and their workforces, and approaches to enhance our verification of their practices.

Figure 5: FY24 Pilbara Minerals' tier 1 supplier procurement spend and exposure to modern slavery risk














¹ According to sanctions assessed by Pilbara Minerals.

² The prevalence of modern slavery per 1,000 people in different countries is estimated using a combination of individual and country-level risk factors. Walk Free (2023), Global Slavery Index 2023, Minderoo Foundation.



A breakdown of the goods and services procured in FY24 across these tier 1 suppliers can be seen in Table 4. We acknowledge high-risk commodities including garments, textiles, electronics and solar panels, are also located within our supply chain.

Table 4: Breakdown of tier 1 suppliers by goods, services, and country

Category	Description of service	Majority country spend
 Bulk fuels, oils, gases, lubes	Fuel supply to camps	Australia
 Camps and village services	Village services such as cleaning and catering	Australia
 Chemical, reagents	Supply of chemicals for processing and operations	South Africa, Australia
 Construction and projects services	Planning and construction of site infrastructure	USA, China, Australia
 Equipment, spares, goods	Supply of parts such as solar panels and vibrating equipment	China, Mauritius, South Africa, Ireland, New Zealand, Australia
 Financial services	Banking services and financial advice	Australia, UK
 IT software and communications	Provision of IT and computer equipment	France, Ireland, Canada, USA
 Labour hire and recruitment	Candidate assessment and recruitment through third party	Australia
 Logistics, bulk transportation, shipping	Transport of product via road and ocean freight	UK, Denmark, Singapore, South Korea, Japan, Australia
 Travel and leisure	Aviation services	Australia
 Utilities and power	Supply and installation of power to camps, sites and offices	Australia

Section 3 Our actions to assess and address modern slavery, due diligence and remediation processes

Pilbara Minerals is committed to ongoing evaluation of our suppliers, contractors, logistics providers and partners by considering industry and regional factors, and their adherence to human rights criteria.

We actively seek to collaborate and engage with local entities that demonstrate responsible business practices. In instances where local procurement is not feasible, the Company works to establish partnerships and procure from well-regarded organisations that are engaged by other leading mining companies. Leveraging the established due diligence processes of the sector enhances Pilbara Minerals' own due diligence practices.

Risk assessment and due diligence practices are aligned with widely recognised risk-based identification processes such as the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct¹ supported by other key frameworks referenced in Appendix C.

Supply chain assessment

Pilbara Minerals conducts supplier risk assessments based on their country, industry sector and responses to human rights self-assessment questionnaires. As part of our ongoing supply chain evaluation, we are working to better identify suppliers who source from high-risk areas or industries.

➔ **For an overview** of our supplier onboarding process and the stages involved in our modern slavery review, refer to: pilbaraminerals.com.au/sustainability/responsible-ethical-actions

Expanded human rights assessment questionnaire

During FY24, we strengthened our tender assessments to expand on our human rights and modern slavery criteria. The criteria for assessing supplier impacts has been designed with consideration of the Trafficking in Persons report, Walk Free's Global Slavery Index and various responsible minerals supply chain frameworks (Appendix B). We also assess relationships or planned activities in conflict-affected high-risk areas.

All new suppliers receive our assessment questionnaire upon invitation to our onboarding system. This process collects relevant metrics, enabling us to identify potential red flags and risk indicators that might signal heightened modern slavery risks in our supply chain. If a supplier is flagged, we conduct further assessment and directly engage as needed. This approach aims to verify our suppliers' alignment with our responsible business practices and standards.

In FY24, questionnaire responses from six suppliers raised flags and required further engagement. Following evaluation, the suppliers reviewed their responses, and it was determined that

no corrective actions were necessary. We also re-evaluated and concluded no corrective actions were needed for two suppliers that were flagged as potentially high risk in FY23 (for more details, please see our 2023 Modern Slavery Statement).

If vendors are found to be non-compliant at any time with our processes, we hold the right to cease engagement. We continue to monitor supplier activities and maintain open communication with our suppliers.

¹ Organisation for Economic Co-operation and Development (2018). [OECD Due Diligence Guidance for Responsible Business Conduct](https://www.oecd.org/due-diligence/).

Our grievance mechanism

Grievance mechanisms are critical to the identification of human rights impacts and supporting access to effective remediation. Our grievance mechanism serves as a way to log feedback, analyse trends and allow our business to adapt and change. We aim to be well equipped for an impact to be remedied, preventing future harm.

Personal details of stakeholders who use our grievance mechanism are not released to any third party. These details will only be used

by the Company to support the investigation and subsequent resolution of the grievance, including those related to modern slavery. In the instance that a grievance involves a specific employee or contractor, personal details of the stakeholder lodging the grievance will not be released to these parties without prior permission. For transparency, grievances are in Pilbara Minerals' Annual Report as a total number and aggregated into categories that do not identify individual stakeholders.

Figure 6: Grievance process for Pilbara Minerals



Whistleblower platform

The Company has a whistleblower platform in place, which enables confidential and anonymous reporting of actual or potential misconduct or any improper state of affairs or circumstances in relation to the Company, including protected whistleblower disclosures.

In FY24, we received a total of 12 reports through our whistleblower platform, all of which were reviewed, assessed and investigated where applicable. The Company received no notifications of modern slavery-related issues.

➔ **For more information** refer to our Annual Report and Sustainability Databook.

➔ **Our Whispli App** is available for confidential and anonymous reporting.



Our Whispli App is available for confidential and anonymous reporting as outlined in the Whistleblower Policy. Scan the QR code to download the App.



Modern slavery training

Pilbara Minerals has actively pursued avenues for training and awareness of modern slavery and strengthened our due diligence processes and abilities to identify impacts throughout our operations and supply chain.

In FY24, modern slavery training was rolled out Company-wide, with a particular focus on groups that have greater likelihood to identify or ability to assess and address risks. These key groups were identified using information gathered from peer collaboration through the

Human Rights Resources and Energy Collaborative (HRREc), peer reviews and key industry resources and risk assessment tools. A total of 1,297 individuals from key roles, including contractors, employees and suppliers, completed modern slavery training in FY24. The training campaign led to 43.2% of employees being educated about modern slavery, delivering increased awareness across the business.

In FY25, Pilbara Minerals aims to bring in external specialists to deliver training on the Voluntary Principles on Security and Human Rights. This initiative will target roll out across key health and safety employees, including emergency response officers and our security contractors. The training program is designed to enhance understanding of human rights and how the Principles apply to everyday security operations in an Australian operational context and is planned for both corporate and site-based delivery.

Remediation

Pilbara Minerals' Human Rights Policy outlines our commitment to monitoring and reporting human rights impacts and remedying negative impacts as appropriate. When we identify that we have caused or contributed to human rights impacts, we will respond and determine the most appropriate remedial pathway, either by providing for or cooperating in remediation.

Our approach to remediation is guided by the UNGPs, the HRREc, and Walk Free's Response and Remedy Framework.¹ We aim to ensure access to effective remedy on a case-by-case basis, with actions designed to address the specific circumstances and needs of those affected. We acknowledge that to be effective, remedies should be legitimate,

accessible, predictable, equitable, transparent, rights-compatible and based on engagement and dialogue.² Remedy can involve a variety of measures including but not limited to compensation, restitution, rehabilitation, public apologies, guarantees of non-repetition and changes in relevant practices.

¹ Walk Free & the Human Rights Resources and Energy Collaborative (2022), Modern Slavery Response & Remedy Framework.

² OHCHR (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework.



Section 4 Assessing our effectiveness

To effectively assess and address modern slavery risks, Pilbara Minerals has developed an action plan that includes proactive measures and tracks implementation (refer to Figure 7 and Table 5).

In FY24, we completed or progressed all of our modern slavery commitments.

Figure 7: Action plan progress



Pilbara Minerals views an effective approach to modern slavery as one that proactively identifies where possible, and addresses potential and actual human rights risks throughout its operations and supply chain. The Company is committed to driving positive changes across its operations and value chain.
















We understand that modern slavery is present worldwide and it is therefore not the absence of risk that determines effectiveness but heightened awareness, presence of collaboration and training, and good governance and grievance mechanisms for identification and remedy.



Human Rights action plan

To support Pilbara Minerals' ongoing incorporation of modern slavery prevention practices into day-to-day business, we developed a three-year rolling plan approach to support continuous improvement. We are committed to continually monitoring and publicly reporting on our progress to address human rights and modern slavery risks. The following provides an update on FY24 initiatives and actions developed through to FY27. The pillars of the action plan are designed in alignment with OECD Due Diligence Guidance for Responsible Business Conduct (2018).

Table 5: Action plan to address human rights and modern slavery risks.

Performance key							
		FY24	FY25	FY26	FY27	Status	FY24 Performance commentary
Pillar 1: Strengthened governance	Establish Human Rights Working Group.						We have established our internal Human Rights Working Group. Refer to page 9 for further detail.
	Continuously evaluate human rights related policies, procedures and risk appetite statement to align with evolving legal requirements and best practices.						Key policies have been revised and the Responsible Production and Sourcing Policy was introduced, refer to page 10. In FY25, key policies will be made available in Korean, Mandarin Chinese and Portuguese ensuring greater accessibility for our stakeholders.
	Develop and continue to improve our Stakeholder Engagement Framework.						We have updated our Stakeholder Engagement Plan with support from a third party. We plan to further improve the framework throughout FY25-FY26.
	Review integration of human rights including modern slavery risk assessments into social and climate related risks held in the Company's enterprise risk register.						Ongoing risk review of human rights impacts and their integration into the enterprise risk register is now embedded in our company processes.
Pillar 2: Improved due diligence management processes	Expand the supplier assessment questionnaire to include broader human rights criteria.						Rolled out human rights questionnaire as part of our new onboarding system assessing registered tier 1 suppliers across expanded criteria. Refer to page 20 for further detail.
	Due diligence program across selected suppliers to spot check compliance with expanded Supplier Assessment Questionnaire and tracking.						Supplier spot checks completed prior to onboarding, clarifying the responses to questionnaires. Refer to page 20 for further detail.
	Investigate platforms to enable multiple tier supply chain analysis.						Continuing to develop an approach to address the reduced visibility and control beyond our tier 1 suppliers.
	Investigate tools and platforms to automate the risk management process for modern slavery with enhanced continuous screening against third party data.						Commenced scoping requirements for digital platforms to improve tracking, reporting, and accountability for human rights due diligence efforts.
	Enhance due diligence across human rights criteria with support of additional tools, deep dive assessments and/or platforms.*						Planned activity FY26-FY27.
	Review and strengthen anti modern slavery clauses in standard contract templates.						Review conducted across contract clauses and strengthened obligations introduced through our updated Human Rights Policy.

* Action developed and incorporated into the plan after the FY23 reporting period.

		FY24	FY25	FY26	FY27	Status	FY24 Performance commentary
	Conduct collaboration sessions with business partners on human rights and modern slavery criteria.						Refer to Section 5: Consultation page 27 for further detail.
	Conduct renewable energy procurement workshop with a focus on understanding human rights risks and management controls.						Identified specific controls and control owners through a projects, procurement and sustainability workshop with consideration of future renewable procurement.
	Develop a Supplier Code of Conduct to strengthen expectations of responsible and ethical practices throughout our supply chain.*						Planned FY25.
	Operations responsible minerals review with reference to IRMA (40 criteria) and OECD Due Diligence Conflict Affected High Risk Areas.*						A self-assessment and third party review against the IRMA framework has been completed. Refer to page 17 for further detail.
Pillar 3: Remediation approach aimed at preventing or mitigating adverse impacts	Review Pilbara Minerals' whistleblower program.						We reviewed our whistleblower mechanism to provide greater clarity on reportable conduct and what are considered protected disclosures under the <i>Corporations Act 2001</i> .
	Engage with internal and external stakeholders on co-design of remediation framework.						We are committed to ensuring appropriate remedial pathways are in place should a human rights or modern slavery abuse be identified. In FY24, we made progress in outlining our current mechanisms with planned improvements through FY25-FY27.
Pillar 4: Continual monitoring and transparent reporting	Develop a dashboard to increase the transparency of human rights risks across the supply chain.						During FY24, we implemented a dashboard to monitor supplier responses to human rights questionnaires. We plan to further refine this tool in FY25 to provide additional insights.
	Conduct third party assurance against sustainability disclosures including human rights related metrics.						An independent limited assurance program was developed for selected sustainability metrics in FY24 with plans to extend the assurance program in FY25.
Pillar 5: Communication, training and knowledge sharing	Review modern slavery training program and develop module for company-wide roll out.						During FY24, 1,297 individuals including employees and contractors across the business undertook modern slavery awareness training. Refer to page 22 for further detail.
	Voluntary Principles on Security and Human Rights training across Corporate office and Pilgangoora operation.						In FY25, Pilbara Minerals will engage an external subject matter expert to conduct Voluntary Principles on Security and Human Rights training across key roles.
	Embed modern slavery training in leadership training program.						Enhanced leadership training planned through FY25-FY26.
	Develop and provide resources, such as guidelines and training materials, for ongoing education with contractors, suppliers and business partners.						In FY24 we became a member of the UN Global Compact strengthening our stance on human rights and improving access to educational resources.
	Actively engage with relevant industry associations and memberships such as HRREC.						Actively engaged in HRREC sessions in FY24, planning to host a session in FY25.

Section 5 Consultation and collaboration

Our commitment to addressing modern slavery is supported by a culture of consultation and collaboration.

We regularly engage with various stakeholders including employees, Aboriginal and Torres Strait Islander peoples, suppliers, contractors, investor groups, shareholders, government, community and educational associations. We also engage with ESG (Environmental, Social, and Governance) rating agencies, including due diligence and risk focused solution providers. These engagements play a pivotal role in shaping and refining our short and long term actions.

Consultation

Pilbara Minerals’ approach to business ethics and transparency involves upholding principles important to the Company as well as our stakeholders. Engaging with customers, investors and partners through dedicated roles allows the business to have greater oversight of material topics globally, market trends and international legislation.

Table 6: Summary examples of our consultation and engagement.

Stakeholder	Pilbara Minerals’ response to date
Executive leadership	The Executive Leadership Team members were consulted in the preparation of this Statement, prior to it being submitted to the Sustainability Committee and Board for final review and approval.
Employees	Our Sustainability and Contract and Procurement Teams led the development of this Statement and directly consulted with key functions across the business to draft the statement. Drafts of the Statement were reviewed by our Human Rights Working Group.
Business partners	We work closely with our JV partner in South Korea to ensure values are aligned. POSCO Pilbara Lithium Solution Co Ltd’s two-way collaboration has involved discussions on shared ESG goals, socio-demographics and gender diversity initiatives, global geopolitical trends and potential supply chain impacts.
Acquisitions	Pilbara Minerals engages in due diligence and risk assessments across projects when considering acquisition. Site visits of the Salinas Lithium Project located in Brazil have been undertaken and a third party engaged for environmental and social due diligence.
Suppliers	Pilbara Minerals’ dedicated Contracts and Procurement Team engages with suppliers. The supplier management system supports reporting capability for areas such as human rights, environment, health and safety and cyber security, enabling targeted engagements.
Customers	We held focused discussions and participated in customer ‘Know Your Supplier’ due diligence reviews to support efforts in enhancing transparency and ESG responsibility across the value chain.
Investors	We aim to continually enhance transparency by providing publicly available information, including our Modern Slavery Statement, while also aligning with investor-led disclosure requests such as IAST (Investors Against Slavery and Trafficking) where possible.
Reporting entities	The Managing Director of Pilbara Minerals serves as a Director across all reporting entities (listed in Appendix B), which also share a single Company Secretary. Additionally, most entities benefit from shared representation by independent non-executive directors from Pilbara Minerals, promoting alignment in governance practices and embedding consultation in the preparation of the Modern Slavery Statement as part of the Group process.

Collaboration

Industry associations serve as a valuable platform for collaboration, knowledge-sharing and collective advocacy on issues impacting our industry and community. We recognise the value in aligning with organisations that represent similar interests to raise industry standards to keep our sector safe, responsible and sustainable.

In FY24, we proudly joined the United Nations Global Compact, reaffirming our dedication to sustainable and responsible business practices. By becoming a participant, we are committed to aligning our strategies and operations with the Ten Principles of the UN Global Compact which focus

on human rights, labour, environment, and anti-corruption. As a participant in the Global Compact Network we are required to produce an annual Communication on Progress that details our efforts to integrate these principles into our business practices and to support broader societal goals. The membership provides access to the UN Global Compact Academy for all our employees, providing additional resources for learning best practices.

Pilbara Minerals continues to be an active member of the Human Rights Resource and Energy Collaborative (HRREc). Made up of industry professionals, the group provides

a forum for companies in the resources and energy sectors to share knowledge, improve practices and develop resources to better address and prevent modern slavery across our industries.

As a founding core member of the International Lithium Association, we were foundational in the establishment of the new Responsible Production and Sourcing subcommittee, aiming to enhance lawful collaboration amongst our industry peers to collectively advance ethical practices throughout operations and value chains.

WE SUPPORT



**Human Rights Resource
and Energy Collaborative**



**INTERNATIONAL
LITHIUM
ASSOCIATION**



Appendix A

How our Statement addresses the Modern Slavery Act's requirements

The following indicates the page number/s of the Pilbara Minerals FY24 statement that addresses each of the mandatory criteria in section 16 of the Act.

Modern Slavery Act requirement - Section 16(1)	Page number/s
a) Identify the reporting entity.	Page 1 and Appendix B.
b) Describe the reporting entity's structure, operations and supply chains.	Section 1 (pages 5-13)
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.	Section 2 (pages 14-19)
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.	Section 3 (pages 20-23)
e) Describe how the reporting entity assesses the effectiveness of these actions.	Section 4 (pages 24-26)
f) 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).	Section 5 (pages 27-28)
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 5 – Collaboration (page 28)

Appendix B

Pilbara Minerals Group reporting entities

Pilbara Minerals Limited was incorporated in 2005, and is a public company listed on the Australian Securities Exchange (ASX: PLS), headquartered in Perth, Western Australia. The Company's registered office is Level 2, 146 Colin Street, West Perth, WA 6005.

The Pilbara Minerals Group reporting entities as at 30 June 2024 comprised:

Pilbara Minerals Limited	ACN 112 425 788
Pilbara Lithium Pty Ltd	ACN 610 861 044
Pilgangoora Holdings Pty Ltd	ACN 616 550 497
Pilgangoora Operations Pty Ltd	ACN 616 560 395
Pilbara Minerals Korea JV Pty Ltd	ACN 630 034 669
Mt Francisco Operations Pty Ltd	ACN 628 475 990
Ngungaju Lithium Operations Pty Ltd	ACN 095 384 491
Tabba Tabba Tantalum Pty Ltd	ACN 154 081 339

This Statement has been prepared in consultation with each reporting entity covered by the Statement.

Appendix C

Definitions, glossary, references and resources

Definitions

Modern slavery	Modern slavery refers to situations where individuals are exploited through coercion, threats, or deception, undermining their freedom. It encompasses a variety of practices, including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery.
First Nations business spend	Procurement spend with an entity that is at least 50% owned by one or more Aboriginal and/or Torres Strait Islander persons. Pilbara Minerals verifies this status through either Supply Nation registration/certification or its internal onboarding system.
Tier 1 supplier	A tier 1 supplier is the closest supplier in the supply chain hierarchy to Pilbara Minerals, meaning that the Company engages with them directly for procurement purposes. They are pre-qualified and onboarded through Pilbara Minerals' vendor onboarding system.

Glossary

Term	Definition
ACSI	American Customer Satisfaction Index
ASX	Australian Stock Exchange
ESG	Environmental, Social and Governance
FY	Financial Year for example, FY24 refers to the Financial Year 2024
HRREc	Human Rights and Resources Energy Collaborative
IRMA	Initiative for Responsible Mining Assurance
ISO	International Organisation for Standardisation
OECD	The Organisation for Economic Cooperation and Development
UNGPs	United Nations' Guiding Principles on Businesses and Human Rights
UN Global Compact	United Nations Global Compact

References and resources

- ACSI (2019), Modern Slavery Risks, Rights & Responsibilities: A guide for companies and investors.
- Business and Human Rights Resource Centre (2024), <https://www.business-humanrights.org/>
- Ethical Trading Initiative (2024), <https://www.ethicaltrade.org/>
- Fair Labor Association (2024), <https://www.fairlabor.org/>
- Global Business Initiative on Human Rights (2024), <https://gbihr.org/>
- Institute for Human Rights and Business (2024), <https://www.ihrb.org/>
- International Labour Organization (2024), <https://www.ilo.org/>
- International Organization for Migration (2024), <https://www.iom.int/>
- KPMG (2021), Resources, Energy and Modern Slavery.
- OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct.
- OHCHR (2011), Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework.
- United Nations Global Compact (2024), Decent Work Toolkit for Sustainable Procurement.
- Walk Free (2023). Global Slavery Index, <https://www.globalslaveryindex.org/>

Important notice

This Statement may contain some references to projected timeframes, performance, future strategies, forecasts, estimates, assumptions and other forward looking statements. Forward looking statements are provided as a general guide only and should not be relied upon as an indication of future performance and the Company can give no guarantee that they will be achieved. Actual results, performance, actions and developments of the Company may differ materially from those expressed or implied by the forward looking statements in this Statement. Forward looking statements are based on information available at the time of preparation. The ongoing nature of the Company's efforts to address modern slavery risks may result in modifications to strategies, policies, and practices over time. The Company does not undertake any obligation to publicly update or revise any forward-looking statements, whether as a result of new information, future events, or otherwise, except as required by applicable laws or regulations.



