



Mandalay Resources Costerfield Operations Pty Ltd

2024 Modern Slavery Statement



Reporting Criteria	Page Number of this Statement
Identify the reporting entity.	2
Describe the reporting entity's structure, operations, and supply chains.	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.	4
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	6
Describe how the reporting entity assesses the effectiveness of such actions.	7
Describe the process of consultation with any entities the reporting entity owns or controls and for a reporting entity covered by a joint statement, the entity giving the statement.	10

1. Reporting entity

This Modern Slavery Statement (**Statement**) is made under the *Modern Slavery Act 2018* (Cth) (**Act**). It sets out the actions taken by Mandalay Resources Costerfield Operations Pty Limited ACN 006 711 119 ("**Costerfield**", "**us**", "**we**" or "**our**"), to assess and address modern slavery risks in our operations and supply chain during our financial year ending 31 December 2024.

Costerfield recognises the responsibility it has to affect change through its supply chain and procurement practices. We are committed to the continuous and active implementation of processes to reduce the risk of modern slavery and protect our employees, customers, supply chain workers and the local community. In addition, our commitment to demonstrate high ethical standards and integrity.

2. Structure, operations and supply chains

Structure

Costerfield is wholly owned by Mandalay Resources Australia Pty Limited ACN 005 482 815 (**MRA**). MRA is wholly owned by Mandalay Resources Corporation (**Mandalay**) which is listed on the Toronto Stock Exchange (**TSX**). As the child company of Mandalay, many of the initiatives implemented by Mandalay have been followed by Costerfield.

Costerfield is a reporting entity for the purposes of the Act. Costerfield does not own or control any other entities and this Statement is submitted on behalf of Costerfield as the only reporting entity. Costerfield's registered office is located at McNicols Lane, Costerfield, Australia, 3523.

Operations

Costerfield is a narrow vein mining company producing two products, Gold (Au) and Antimony (Sb). Costerfield operates predominantly in two physical locations, Brunswick & Augusta sites, which are roughly 1km apart and joined through underground mining. Costerfield sells concentrate products in Australia and globally. Costerfield employs approximately 236 full-time employees and 42 contractors, and processes around 140,000 tonnes of ore each year.

The Costerfield operation is located in Victoria, Australia, approximately 10 km northeast of the town of Heathcote, Victoria. Purchased in 2009 from AGD Mining Pty Ltd, Costerfield immediately restarted capital development. By 2013, through extensive improvements and investments in mining and processing methods, the processing plant's capacity was expanded to approximately 12,000 tonnes per month from 5,000.

The Augusta mine has been operational since 2006 and was the sole ore source for the Brunswick processing plant until December 2013, when ore production started from the Cuffley deposit located approximately 500 m to the north of the Augusta mine workings. In 2017 the Brunswick deposit came into production and was being mined in conjunction with the Youle deposit, which produced its first ore in August 2019.

Youle has been the main source of ore source since the third quarter of 2020. In 2021, the Shepherd ore body was discovered which is positioned close to the Youle deposit. Mining of this body commenced in February 2022.

The mining method employed is long-hole stoping with cemented rock fill. Ore is accessed by a primary spiral ramp, known as a decline. From the decline, horizontal development branches off in both directions of the deposit, at a minimum width of 1.8 m drives. Levels are then mined out on retreat with long hole stopes drilled. The stopes are subsequently backfilled with cemented rock fill to supply stability, reduce dilution, increase mining recovery and allow for mining above and below developed levels.

Ore was once trucked on the surface from the Augusta mine portal to the Brunswick processing plant. However, during 2020 a portal to the Brunswick site was completed, linking the two sites underground. This enables ore to be trucked underground directly to the mill site, where it is stockpiled and blended into the processing circuit. The circuit includes two-stage mobile crushing, primary and secondary ball mills, flash cells, rougher, scavenger, cleaner flotation, cavitation tube sparging, gravity circuit, and filtering. Gravity gold concentrate is sold to a refinery in Melbourne, Victoria, and gold-antimony flotation concentrate is trucked to the port of Melbourne and shipped to one of two smelters in China, or a smelter in the US.



Supply chain

Costerfield makes a conscious effort to procure supplies from local suppliers (Regional Victoria). Where it is not possible to acquire from local suppliers, Costerfield engages a broader range of Australian suppliers. Proudly, 95% of Costerfield's supplies are sourced from Australia and a large portion of these suppliers are suppliers which Costerfield has been working with for many years. This increases the visibility of our supply chain to minimise the risk of modern slavery practices.

Below is a list of the countries where Costerfield's suppliers are located:

Country	Number of Suppliers
United Kingdom	2
Ireland	1
China	1
Canada	1
Peru	1
Australia	125
Total	131

When measuring by value, Costerfield's total procurement expenditure is largely within Australia. 95% of Costerfield's expenditure is within Australia, spent supporting local businesses and service providers. The remaining expenditure occurred internationally.

Due to the nature of Costerfield's operations, our supply chain consists of a diverse range of products and services. Costerfield mainly procures goods required for mining including explosives, ground support materials, fuel, reagents, grinding material and components for equipment (i.e. truck and loader parts). Costerfield mainly procures services for mine related activities, including drilling, earth works, dust suppression and providing energy, each of which is sourced locally from suppliers with which Costerfield has a long-standing relationship.

3. Our modern slavery risks

Our People

Costerfield assesses the modern slavery risks in its operations and supply chain by considering the product and/or service and how and where this product and/or service is procured. Costerfield has used the Global Slavery Index as a tool to assess the modern slavery risks in its supply chain. As Costerfield's operations are heavily reliant on their workforce, our staff and contractors are diligently engaged and onboarded by Costerfield's human resource representatives (i.e. this function is maintained in-house).

Costerfield ensures all legal requirements are met in respect of the engagement of workers. In addition to this, Costerfield relies on an enterprise agreement which is signed off through Fair Work Commission Australia, which sets out our employee's entitlements and goes beyond the minimum entitlements of the National Employment Standards. To minimise the risk of modern slavery, Costerfield ensures lawful working conditions and fair salaries are provided. Within our workforce, Costerfield has a handful of workers hired on VISA's for specialty activities. These workers are subject to employment contracts that comply with all Australian laws. All VISA applications are overseen in-house with the assistance of an immigration lawyer. We have assessed our hiring practices as low-risk due to these listed measures being in place.

To minimise the risk of modern slavery, Costerfield also ensures that it provides fair salaries, per the local benchmarking analysis, working hours are within the legally approved shifts, and overtime is within the limits stipulated by the local labour laws.

Regular audits are undertaken by AREEA, an industry body, to ensure that all of Costerfield's employment law practices are compliant with Australian laws. Costerfield adjusts any relevant policy following the results of those audits accordingly.

Our Suppliers

Costerfield is committed to protecting human rights throughout our entire supply chain, including indirect suppliers (i.e. the suppliers of its direct suppliers, and the source of components that form equipment and goods that we procure). Costerfield's direct suppliers are mainly based in Australia and the risk of modern slavery within this supply chain is low. Throughout the future financial years, Costerfield plans to implement more stringent compliance processes to ensure all new on-boarded suppliers commit to addressing and minimising modern slavery risk in their operations and supply chain.

During this reporting year, Costerfield, with the support of Mandalay, has continued to ensure its suppliers are not associated with modern slavery by committing to proper due diligence, performing random supplier audits and examining their full supply chain to mitigate any potential risks.

Costerfield has identified the following risks of modern slavery practices in its operations and supply chains.

- Where Costerfield is unable to source goods or services from Australian suppliers, Costerfield seeks to obtain those goods or services from overseas. This inherently involves some risk as it is difficult to have complete transparency throughout a multi-tiered supply chain.
- Costerfield has identified the few suppliers which have a higher level of vulnerability. We have used the Global Slavery Index to classify them below:

Country	Number of Suppliers	Level of Vulnerability ¹¹
United Kingdom	2	14/100
Peru	1	47/100
China	1	46/100
Total	4	

- Where Costerfield engages suppliers from a jurisdiction with a higher level of vulnerability, Costerfield is seeking to undertake additional due diligence on those suppliers. Costerfield also attempts to travel to meet any international suppliers when they are on-boarded. Meeting these suppliers face-to-face helps Costerfield to inspect their sites and assess the modern slavery risk.
- Costerfield acquires goods from one supplier in both China and Peru which have higher levels of vulnerability. Costerfield continues to work to ensure it reviews the risks of modern slavery in its operations and supply chain each new reporting period to provide the most up-to-date assessments of risk as far as possible when publishing future modern slavery statements.
- Costerfield has identified that majority of our goods are acquired from countries considered to have a low level of vulnerability. We have used the Global Slavery Index to classify them below:

Country	Number of Suppliers	Level of Vulnerability ¹
Ireland	1	9/100
Canada	1	11/100
Australia	125	7/100
Total	127	

Internal Equipment

¹ <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>

- Costerfield acknowledges it provides electronics (including computers, laptops and mobile phones) to its employees. Costerfield understands that there may be a higher risk of modern slavery in respect of such products. To minimise this risk, Costerfield predominantly sources this via a leading IT provider in Australia.
- Costerfield procures drilling and other equipment from an overseas supplier as this specialised equipment cannot be readily procured in Australia. Costerfield is conducting further due diligence enquiries in respect of this supplier in particular. Specifically, Costerfield is undertaking a country risk review using the Global Slavery Index and ongoing engagement with the supplier to ensure their compliance with ethical sourcing standards.

Our Policies

Costerfield's policies demonstrate its commitment to acting responsibly and ensuring its employees understand acceptable business practices. Costerfield's policies include its Code of Conduct, which covers anti-bribery, anti-money laundering and modern slavery, its Non-Discrimination and Harassment Policy, and its Whistleblower Policy.

Mandalay, and by extension Costerfield, is governed by its Code of Conduct. All directors, officers, employees, consultants and contractors of the Mandalay group must conduct themselves ethically and comply with the applicable laws, rules and regulations. All employees of Costerfield review and sign off on the Code bi-annually. This ensures that every employee is consistently reminded of their obligations under the Code.

Mandalay also runs a Whistleblower hotline, which employees are encouraged to use to report any corruption or bribery. The hotline is broadly available and disseminated at all sites. Outside of the hotline, all employees are encouraged to report any corruption or bribery to their managers.

4. Actions taken to assess and address risk

During the 12-month reporting period we have continued to take steps to review our processes and assess and address risks in our supply chain. We seek to reduce the prevalence of modern slavery in our operations and supply chain.

The actions we took during this reporting period were:

- actively minimising the number of countries we obtain supply from with a high prevalence of modern slavery, as guided by the Global Slavery Index;
- all new or revised contracts have been updated with provisions directly relating to modern slavery. Since this introduction, Costerfield has been able to assess from a contractual perspective which suppliers are bound by our modern slavery requirements;
- introduction of modern slavery requirements in our Occupational Health & Safety statement. Compliance with these requirements is assessed upon each on-boarding site visit to ensure our new suppliers meet our expectations;
- regularly reviewed our existing set of policies and procedures to ensure they articulate our expectations of our team and suppliers. This policy framework ensures that our team members and suppliers clearly understand our expectations;

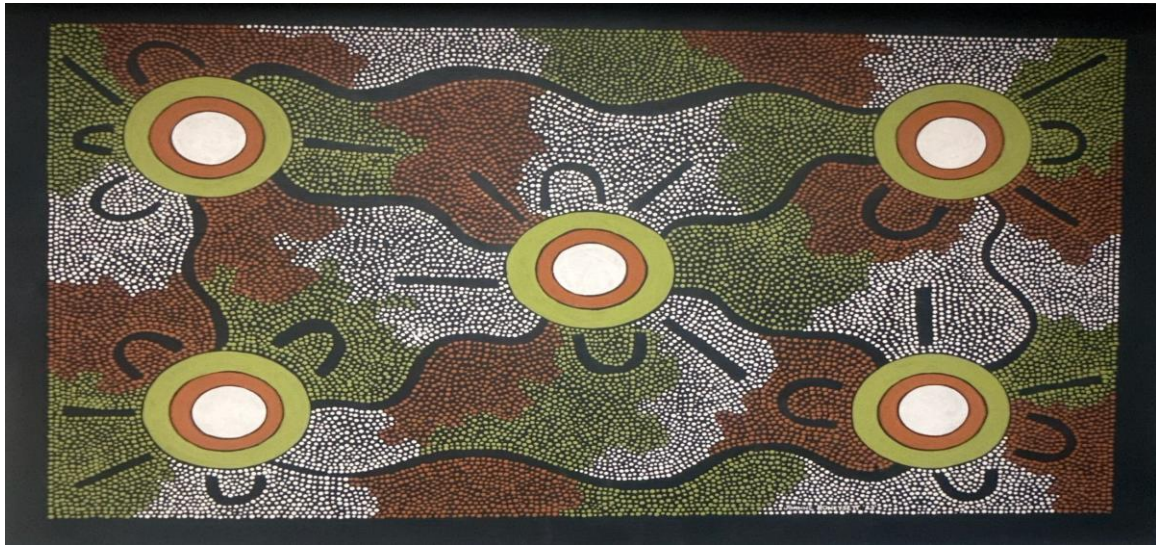
- continued to provide a staff education program to increase employee awareness and engagement regarding modern slavery. In addition to raising awareness, the education program covers the fundamental governance principles which require adherence across all of our business operations and grievance procedures available to our employees. Each of our employees were required to participate in the training;
- continued to target an education program to our suppliers in relation to modern slavery. This was distributed to our suppliers in written format who then passed this information onto their senior management. We also engaged in one-on-one discussion with the suppliers to maintain a focus on their modern slavery practices;
- we continued to include modern slavery requirements in our supplier contracts. These specific clauses used to target modern slavery risks within our supply chain assist in safeguarding the human rights of workers;
- our online program for procurement has been updated to include acknowledgement of the Act and its requirements. Our prequalification questionnaire is designed to determine certain levels of risk prior to us engaging with a new supplier which now includes addressing risks related to modern slavery;
- continuing to issue our prequalification questionnaire to any contractors who come to a Costerfield site. Completion of the questionnaire is required for access to the site, and the questionnaire addresses modern slavery in the contractor's business; and
- implementation of our updated purchase order terms and conditions which now include a modern slavery provision. The supplier is now required to educate themselves and their employees (including sub-contractors) of requirements under the modern slavery legislation and comply with these obligations. The supplier is also required to promptly inform us of any modern slavery suspicions in their supply chain. This practice aims to hold the supplier accountable and raise awareness.

Remediation processes

Costerfield has the following remediation processes in place to address modern slavery concerns:

1. **Internal Assessment** - Team members from our procurement team and our sustainability team review all new suppliers in collaboration with other employees. In the instance a modern slavery risk is flagged, this is assessed further. Costerfield is committed to ceasing any current or future business relationship with organisations that do not align with its modern slavery expectations and values.
2. **Notifications** - Costerfield ensures modern slavery concerns can be flagged by any stakeholder via our whistle-blower hotlines. This is an accessible pathway to communicate any risks with our team. Costerfield approaches these notifications in a serious manner and investigates accordingly.

Costerfield's remediation processes demonstrate our commitment to managing any potential ethical issues in an appropriate manner, consistent with our values.



5. Assessing the effectiveness of our actions

Costerfield is determined to improve its response to modern slavery and wishes to identify, in a meaningful and measurable way, whether the actions it is taking have been effective. We take any breach involving a risk to human rights seriously and address it promptly to focus on the ultimate outcome being to reduce or remove the risk altogether.

In the coming reporting year, we intend to implement a number of measurable activities to determine the effectiveness of our actions. Our effectiveness will be reviewed through the following processes:

Activity	Measurement
Board oversight	Discussed at our bi-annual board meetings. The board intends to focus on the effectiveness of actions taken in relation to our modern slavery initiatives.
Auditing	Costerfield is striving towards implementing auditing in the areas of our business which focuses on suppliers and our employees. Conducting audits on our suppliers will ensure their compliance with limiting modern slavery risk and practices, and audits on our employment practices will ensure that Costerfield remains compliant amid the landscape of Australian employment law.
Supplier Visits	Where an overseas supplier is to be used for the provision of goods or services, Costerfield will aim to arrange face-to-face visits with that supplier, to reduce the risks of modern slavery and have a clear oversight of its supply chain. By

	visiting face-to-face, Costerfield intends to inspect the supplier's site and make an assessment about the modern slavery risk.
Policy Review	Complete policy review for all supplier related policies. This involves monitoring and reviewing the effectiveness of risk management measures relied upon by Costerfield.
Team Member Training	All managers will be trained on the implications of Modern Slavery. Costerfield maintains a continuous focus on training and collaboration to improve the awareness and knowledge amongst our team members. Costerfield is aiming to roll out training at site-level. This training will focus on identifying red flags in procurement, HR and contractor management. To ensure the best attendance, Costerfield will conduct this in-person and virtually.
Engagement with our high-risk suppliers	Create an education communication for our suppliers. This is an effective tool to ensure suppliers are also aware of ethical sourcing processes and adequate standards.
	Drafting a supplier self-assessment questionnaire. The questionnaire aims to identify the gaps in our suppliers' ethical business procedures and we will work with our suppliers to improve their management of the risk of modern slavery.
	Continue to undertake supplier visits to assess any prevalent risks of modern slavery in our supply chains and informally discuss modern slavery practices with our suppliers.
	Cease engagement with suppliers who demonstrate non-compliance with modern slavery requirements.

6. Consultation

There were numerous consultations throughout the reporting period to assist in the compilation of this statement. Costerfield made efforts to collaborate with personnel across the company to discuss the activities within their operations and supply chain that are detailed throughout this statement.

As Costerfield did not own or control any other entities, it did not consult with any such entities.

This statement was approved by the Board of Mandalay Resources Costerfield Operations Pty Ltd.

Signed,



Ryan Austerberry

Director, Mandalay Resources Costerfield Operations Pty Ltd.

Dated: 30/06/2025