



# Modern Slavery Statement - Atlas Group FY25

This Modern Slavery Statement for the Atlas Group is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth) for the financial year 1 July 2024 – 30 June 2025 (Statement).

**Table of contents**

Message from the CEO .....3

1. About this Statement .....4

    1.1 This Statement .....4

    1.2 What is Modern Slavery.....4

2. About Atlas: structure, operations and supply chain.....5

    2.1 The reporting entity .....5

    2.2 Structure .....6

    2.3 Corporate governance .....6

    2.4 Operations .....6

    2.5 Atlas workforce and employment practices .....7

    2.6 Traditional Owners.....8

    2.7 Philanthropy.....8

    2.8 Supply chain .....8

    2.9 Location of suppliers .....9

3. Modern Slavery risks .....10

    3.1 Modern Slavery risks in operations .....10

    3.2 Modern Slavery risks in supply chain.....12

    3.3 Risk assessment .....12

4. Actions taken to address risks.....13

5. Assessment of the effectiveness of actions .....14

6. Actions planned for the next Reporting Period .....15

7. Relevant information .....15

8. Any other business.....15

9. Consultation .....16

## Message from the CEO



I am honoured to lead an organisation committed to maintaining the highest standards for our contractors, business partners, and stakeholders. Our operations are coordinated with integrity, and we prioritise building strong relationships with contractors and suppliers, founded on mutual trust and respect.

We actively address the issue of modern slavery by maintaining robust frameworks designed to identify and resolve any instances within our operations and supply chain. Recognising that this area requires ongoing attention, we remain focused on continually strengthening our risk management and due diligence processes related to modern slavery. The compliance portal serves as a critical control for contractor and supplier screening, and high-risk supply chains continue to be a principal focus.

Educating our contractor network and workforce on the risks associated with modern slavery is undertaken alongside engagement with industry experts and participation in relevant forums that encourage continuous improvement and transparency.

Our commitment to combating modern slavery and upholding a responsible supply chain is reflected in tangible actions, which are detailed throughout this document. We strive for ongoing enhancements and work closely with contractors, suppliers, and industry partners to drive meaningful change.

It is with this commitment that I present our annual statement, outlining our continued efforts toward eradicating modern slavery. We welcome feedback and remain dedicated to making a significant impact in this vital area.

A handwritten signature in black ink, appearing to read 'Gerhard Veldsman'. The signature is fluid and cursive, written over a light grey background.

**Gerhard Veldsman**

Chief Executive Officer  
Hancock Iron Ore

Date 20 December 2025

## 1. About this Statement

### 1.1 This Statement

Atlas Iron Pty Ltd (**Atlas** or the **Company**) is pleased to present its 2025 Modern Slavery Statement for the financial year ended 30 June 2025.

This Statement has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) and addresses the mandatory reporting criteria outlined in the legislation. Specifically, it provides information on:

- The reporting entities covered by the Statement;
- Atlas' structure, operations, and supply chains;
- Identified risks of modern slavery within our operations and supply chains;
- Actions taken to assess and address those risks;
- How the effectiveness of these actions is evaluated;
- The consultation process; and
- Other relevant information that reflects Atlas' commitment to combating modern slavery.

Following the reporting period covered in this Statement, Atlas and its related body corporate, Roy Hill Holdings Pty Ltd (including its subsidiaries), have completed an integration process and now collectively operate under the name Hancock Iron Ore.

This integration does not affect the ownership or corporate structure of the underlying legal entities. However, the integration has introduced centralised management, a unified vision and set of values, and alignment of core processes and procedures. These enhancements strengthen the governance, risk management, and reporting frameworks relating to modern slavery. For the purposes of the FY25 Modern Slavery Statement under the *Modern Slavery Act 2018* (Cth), Atlas and Roy Hill will continue to report as separate entities.

The integration also delivers greater visibility across a wider supplier base, improving our capacity to identify, assess, and address modern slavery risks while ensuring we continue to meet our obligations under the *Modern Slavery Act 2018* (Cth).

### 1.2 What is Modern Slavery

Modern slavery involves the use of coercion, threats, or deception to exploit individuals and deny them their freedom. According to estimates by the United Nations and the Walk Free Foundation, more than 40 million people globally are affected by modern slavery, with approximately 16 million exploited within private sector supply chains. Women and girls are disproportionately impacted, comprising 71% of all victims.<sup>1</sup>

Although Australia is considered a low-risk jurisdiction, it is not exempt from modern slavery. National estimates indicate that up to 1,900 individuals may be victims within Australia. Under the Act, modern slavery encompasses the following practices:

---

<sup>1</sup> Modern Slavery Key Facts and Figures, Australian Government, Attorney-General's Department. Available at: <https://modernslaveryregister.gov.au/resources>

- Slavery;
- Human trafficking;
- Servitude;
- Forced labour;
- Deceptive recruiting for labour or services;
- Forced marriage;
- Child labour; and
- Debt bondage.

## 2. About Atlas: structure, operations and supply chain

### 2.1 The reporting entity

Atlas Iron Pty Ltd (ACN 110 396 168) is a **reporting entity** for the purposes of the *Modern Slavery Act 2018* (Cth). In this Statement, references to “Atlas”, “Company”, “we”, “us”, “our”, or the “Atlas Group” refer to Atlas Iron Pty Ltd and its wholly owned subsidiaries, unless otherwise specified.

Atlas is committed to upholding ethical business practices and has established a Modern Slavery Policy that clearly expresses its opposition to all forms of modern slavery. The policy outlines Atlas’ commitment to identifying and addressing the risk of modern slavery within its operations and supply chains. Atlas also expects its suppliers and contractors to uphold the same high standards and to implement practices that prevent modern slavery in their own operations and supply networks.

To support the implementation of this policy, Atlas has developed an internal Modern Slavery Specification. This document provides a structured framework for managing modern slavery risks and includes:

- Defined accountabilities across the business;
- A methodology for assessing operational and supply chain risks;
- Requirements for supplier onboarding and contracting;
- An approach to auditing and compliance monitoring;
- Proposals for employee training and awareness;
- Mechanisms for confidential internal reporting and annual external modern slavery reporting; and
- Procedures for the remediation of any identified issues.

Atlas reviews its Modern Slavery Policy and Specification annually to ensure they remain aligned with the Company’s evolving structure, operations, and risk profile. This ongoing review reflects Atlas’ commitment to continuous improvement and its broader ambition to contribute to the eradication of modern slavery.

Although no updates were found to be warranted to the Policy and Specification in FY2025, it is anticipated that both documents will be refreshed in FY2026 in connection with the corporate changes associated with the Hancock Iron Ore integration and reflected in the FY2026 Goals in section 6. These updates will

incorporate the enhancements designed to strengthen governance, risk management, and reporting frameworks in relating to modern slavery for Hancock Iron Ore.

## 2.2 Structure

Atlas Iron Pty Ltd is majority owned (99%) by Redstone Corporation Pty Ltd, a wholly owned subsidiary of Hancock Prospecting Pty Ltd. The remaining 1% is held by Marubeni Iron Ore Australia Pty Ltd.

All Australian-registered entities within the Atlas Group are proprietary limited companies. Further details regarding Atlas Iron Pty Ltd's material subsidiaries are available in the Company's FY2025 Annual Report.

Atlas' corporate structure comprises the Atlas Board, the Chief Executive Officer, and a leadership team responsible for key business functions including operations, development, sales, finance, and governance.

As discussed in greater detail in section 1.1, effective 1 July 2025 Atlas and Roy Hill will operate under the unified banner of Hancock Iron Ore. This integration does not affect the ownership or corporate structure of the underlying legal entities, but brings centralised management, shared vision and values, and alignment of core processes and procedures across the combined business.

## 2.3 Corporate governance

Strong governance is embedded in Atlas' culture and underpins the way we operate and uphold our company values. We are committed to maintaining high standards of corporate governance, with policies and practices that support continuous improvement and enable effective, responsible decision-making.

The Atlas Board holds ultimate responsibility for overseeing the Company's approach to modern slavery risk management. Operational responsibility for compliance with the Modern Slavery Act and the implementation of Atlas' modern slavery obligations is delegated to the Chief Executive Officer and the Chief Financial Officer & Company Secretary, ensuring accountability and alignment with broader governance frameworks.

## 2.4 Operations

Atlas is an Australian-owned iron ore company operating in the Pilbara region of Western Australia. We mine and export direct shipping ore, which is sized and blended to meet market specifications before being transported by road trains to Port Hedland for export.

Our key operational sites include Mt Webber, Sanjiv Ridge, and Miralga Creek. The Company also has several projects in development, including McPhee Creek.

Atlas operates under an owner–contractor model, engaging experienced contractors to carry out core mining activities such as drilling, blasting, excavation, processing, haulage, and shipping. This approach enables operational flexibility and fosters strong, collaborative relationships with contractors. Atlas sold and exported approximately 10 million wet metric tonnes of iron ore during FY2025. The Company's principal place of business and registered office is located at 1314 Hay Street, West Perth, Western Australia.

**Figure 1 Atlas' Miralga Creek operations**

## 2.5 Atlas workforce and employment practices

At Atlas, we recognise that our people are our greatest asset. We are committed to fostering a collaborative environment where individuals are inspired, empowered, and treated with respect. This shared commitment enables us to collectively achieve our strategic goals and objectives.

Our employment practices are designed to offer competitive remuneration and conditions that meet or exceed industry standards. Further details regarding the Company's employment policies and employee protections are outlined in Section 3.1 below.

As at 30 June 2025, Atlas employed approximately 175 individuals across permanent, casual, and part-time roles.

The proportion of female employees was approximately 32%, exceeding the mining industry average of approximately 22%, as reported in the Workplace Gender Equality Agency (WGEA) Australia's Gender Equality Scorecard 2024–25.<sup>2</sup> Atlas remains committed to enhancing female participation across its workforce. This commitment is underpinned by the Company's Equal Employment Opportunity and Diversity Policy, which outlines our dedication to fostering a fair, inclusive, and equitable workplace where all employees are supported to reach their full potential.

---

<sup>2</sup> Workplace Gender Equality Agency. *Australia's Gender Equality Scorecard 2024-25*. Published 20 November 2024. Available at: <https://www.wgea.gov.au/publications/australias-gender-equality-scorecard>

## 2.6 Traditional Owners

Atlas is proud of its longstanding relationships with Traditional Owner groups in the Pilbara region. We recognise and respect the deep cultural and spiritual connection that Traditional Owners have with the land on which we operate.

Atlas is committed to working collaboratively with Traditional Owners to create meaningful opportunities for Aboriginal employment and business development. Through ongoing engagement, we aim to support economic participation, build capacity, and foster long-term partnerships that contribute to sustainable outcomes for Traditional Owner communities.

Our approach reflects Atlas' broader commitment to reconciliation, inclusion, and responsible resource development, ensuring that our operations are conducted in a manner that honours the heritage and rights of Traditional Owners.

## 2.7 Philanthropy

Atlas is committed to making a positive and lasting contribution to the communities in which we operate, particularly those in the Pilbara region. Through our community grant program, we provide financial assistance to small, grassroots non-profit organisations that deliver meaningful local impact. These grants help strengthen community initiatives, promote social wellbeing, and support projects that align with Atlas' values.

In addition to supporting external organisations, Atlas also recognises and encourages the contributions of our employees who volunteer their time to community causes. From time to time, grants are provided to organisations where Atlas employees are actively involved, reinforcing our commitment to fostering a culture of giving back and supporting the personal efforts of our workforce in making a positive difference.

## 2.8 Supply chain

Our supply chain spans the full value chain of our iron ore operations, encompassing development, mining, crushing, haulage, shipping, and sales to customers. Atlas sources goods and services both domestically within Australia and internationally.

The Company's internal procurement and commercial teams oversee the acquisition of goods and services from more than 700 suppliers. These suppliers provide a wide range of inputs essential to Atlas' operations, including:

- Mining, crushing, haulage, port, and camp services;
- Construction materials for site development and maintenance;
- Consumables and spare parts for equipment and infrastructure;
- Fuel for operational and transport needs;
- Freight and shipping services;
- Equipment hire;
- Clothing and personal protective equipment (PPE);
- Labour and recruitment services; and

- IT software, hardware, and mobile telecommunications.

## 2.9 Location of suppliers

We prioritise the use of local suppliers. 97% of our supplier base is located within Australia, with the remainder located globally. In FY2025, of the total spend with Australian suppliers, 98% was with West Australian suppliers.

Whilst most of Atlas' suppliers are locally operated, Atlas acknowledges that some of these suppliers on-sell goods sourced from other countries.

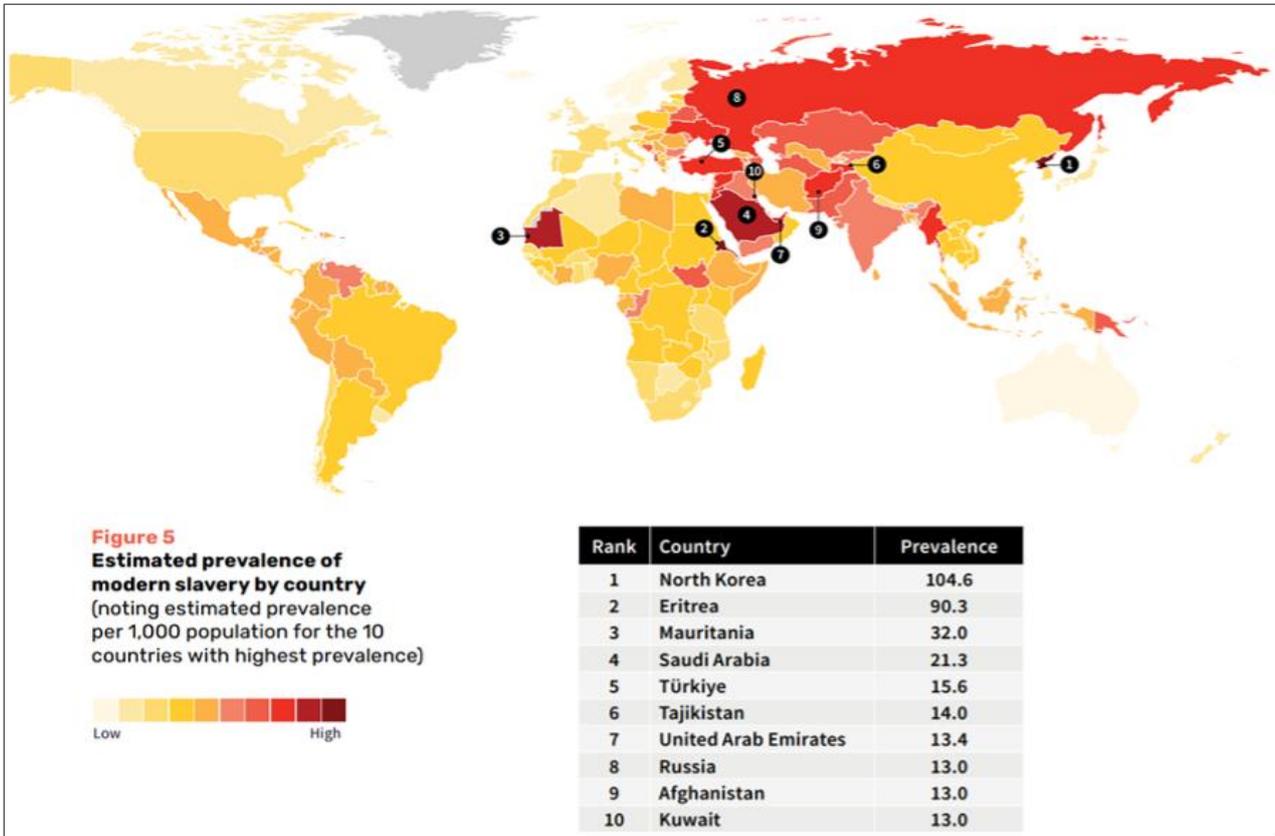
Table 1 sets out the percentage of net value spend by country for the financial year ending 30 June 2025.

**Table 1 – Atlas FY25 Net Value Spend by Country**

Supplier Country / Region	% Net Value
Australia	85.92%
China	13.84%
Singapore	0.12%
Germany	0.08%
USA	0.02%

Atlas draws on internationally recognised resources to inform its approach to modern slavery risk management. One such resource is Walk Free, an international human rights group focused on the eradication of modern slavery in all its forms. Walk Free publishes the Global Slavery Index, which provides an overview of modern slavery across countries and industries, including a heat map that illustrates estimated prevalence of modern slavery by country. During the reporting period, Atlas incorporated insights from the Global Slavery Index into its supply chain risk assessment process. The heat map was used to help identify geographic areas with elevated modern slavery risks. This analysis confirmed that most of Atlas' suppliers are based in countries assessed as having a low estimated vulnerability to modern slavery.

<sup>3</sup>Figure 2 Modern Slavery heat map



### 3. Modern Slavery risks

Atlas is not aware of any modern slavery practices occurring in its operations or supply chains; however, it recognises there is an underlying risk of modern slavery practices occurring in its operations and supply chains.

#### 3.1 Modern Slavery risks in operations

Atlas’ operations are in West Australia and our employees (who range from professionals to trades roles) are paid in accordance with Atlas’ remuneration and recruitment policies, procedures, and any award applicable to each employee’s job type.

On 30 June 2025, around 50% 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. In a world first for the mining industry, Atlas’ Sanjiv Ridge mine site was in FY2024 awarded the WELL Health-Safety Rating – a subset of the WELL Building Standard pioneered by Delos and administered by the International WELL Building Institute. The rating is made up of six action

<sup>3</sup> Walk Free. *Global Slavery Index 2023 – World Map*. Available at: <https://www.walkfree.org/global-slavery-index/map/>.

areas: cleaning and sanitation procedures, emergency preparedness programs, health services resources, air and quality management, stakeholder engagement and communication and innovation. The certification delivers an established set of minimum standards to protect and nurture the health and safety of the workforce.

**Figure 3 Sanjiv Ridge Mine Accommodation**



Labour hire is a common practice in the mining sector, used to meet operational needs flexibly and efficiently. Atlas acknowledges that, if not carefully managed, labour hire arrangements can carry risks related to modern slavery. For example, unfair or unreasonable contract terms with the labour hire provider may translate to exploitative pay or poor working conditions for labour hire workers.

Atlas takes these risks seriously and maintains a very limited number of labour hire relationships, all of which are subject

to careful oversight. The companies we engage are required to comply with Australia's strong labour laws, which provide important protections for workers and help ensure fair treatment. Atlas is confident that its labour hire arrangements are reasonable, transparent, and do not expose workers to exploitation.

Atlas maintains a Whistleblower Policy designed to promote a culture of transparency, integrity, and accountability. The policy encourages individuals to report any suspected wrongdoing, including unethical, illegal, or unsafe behaviour, and provides robust protections to ensure disclosures can be made safely, securely, and without fear of retaliation. This framework supports a workplace environment where concerns can be raised with confidence and addressed appropriately.

In addition to its internal reporting mechanisms, Atlas was among the first in the industry to implement the Safe2Say anonymous reporting platform. Developed by CrimeStoppers WA, an independent, not-for-profit community organisation and registered charity, Safe2Say enables members of the Atlas workforce to anonymously report workplace misconduct or inappropriate behaviour. All reports received through the platform are investigated in accordance with Atlas' established policies and procedures, ensuring that concerns are handled with fairness, discretion, and due process.

These mechanisms form a key part of Atlas' broader governance and risk management framework, helping to safeguard ethical standards across the organisation and its supply chains.

All Atlas and contractor employees (and their partners and dependents) have access to free counselling through the Employee Assistance Programme delivered by external provider, Assure, and through the Company's Chaplaincy service.

Atlas offers health care benefits to its employees through its Employee Health Care Program, in addition to training and career enrichment programmes.

Atlas considers the risk of modern slavery within its own operations to be low. This assessment is based on the strong policies and protections in place, as well as Australia's consistently low ranking in the Global Slavery Index. However, Atlas recognises that no organisation is immune to potential risks. We remain vigilant and committed to ensuring our practices are designed to detect, prevent, and respond to any instances of modern slavery. This includes regularly reviewing our procedures and maintaining a proactive approach to safeguarding human rights across our operations.

### 3.2 Modern Slavery risks in supply chain

Atlas acknowledges that there are potential risks of modern slavery within its supply chains, particularly where goods and services are sourced from industries or regions that are considered higher risk. We also recognise that supply chains can be complex and that visibility beyond our direct suppliers is often limited. Despite these challenges, Atlas remains committed to identifying and addressing any risks by maintaining responsible sourcing practices and working towards greater transparency across its supply network. Although as many as 97% of Atlas's contractors/direct suppliers are located in Australia (refer section 2.9), sourcing and manufacturing of certain materials may occur in other jurisdictions where there may be less regulation and oversight. Industries considered higher risk include:

- Garments
- Manufacturing (e.g. tyres)
- Electronics; and
- Shipping.

Atlas is confident that its arrangements with contractors and suppliers are fair and do not contribute to the exploitation of workers employed by those organisations. To support this, our procurement contracts include standard terms requiring contractors and suppliers to take reasonable steps to identify, assess, and address any risks related to modern slavery. They are also required to notify Atlas of any known or suspected instances of modern slavery within their operations or supply chains. Furthermore, these obligations must be passed on to their own subcontractors and suppliers, helping to promote ethical practices throughout the broader supply network.

### 3.3 Risk assessment

Atlas' risk assessment framework enables it to identify specific risk factors, categorise and prioritise those risks, evaluate appropriate mitigation strategies, and determine residual risk levels. The assessment process is designed to be practical, supporting informed decision-making and continuous improvement. Key supplier risk evaluation criteria include:

- **Location of work** - recognising that geographic regions vary in their exposure to modern slavery risks.
- **Level of industrialisation** - assessing the maturity of local labour markets and regulatory environments.
- **Nature of engagement** - considering the type of work and contractual arrangements in place.
- **Supplier history** - reviewing past performance, compliance records, and ethical conduct.
- **Supplier systems** - evaluating the presence of internal controls, policies, and procedures to manage modern slavery risks.

The risk assessment tool is an important part of Atlas’ broader risk management framework, which is aligned with the internationally recognised ISO 31000 Risk Management Standard. This alignment ensures a consistent, proactive, and principles-based approach to identifying, managing, and mitigating modern slavery risks across the business.

In FY2026 the Atlas Modern Slavery Risk Management Framework will be updated to align with the corporate changes associated with the Hancock Iron Ore integration, as outlined in the FY2026 Goals in section 6. These updates will incorporate the enhancements designed to strengthen governance, risk management, and reporting frameworks in relating to modern slavery for Hancock Iron Ore.

## 4. Actions taken to address risks

Atlas annually reviews how effectively it identifies and manages modern slavery risks. Going forward, Hancock Iron Ore will continue these reviews, ensuring that activities across all entities are monitored and measured. Actions implemented by Atlas during the FY25 reporting period included:

**Table 2 – Atlas’ implemented actions FY25**

Planned actions from the FY24 Statement	Progress
<b>Improve supplier due diligence</b>	<ul style="list-style-type: none"> <li>Atlas has progressively implemented a new supplier onboarding platform designed to strengthen control over supplier due diligence and onboarding processes. The transition to this platform has enabled more consistent oversight and highlighted suppliers operating under outdated purchase order terms and conditions. This provided an opportunity to ensure that all suppliers are now subject to Atlas’ most current contractual requirements, including those relating to modern slavery obligations.</li> <li>During the reporting period, Atlas also reviewed a range of third-party supply chain risk management platforms to assess their suitability for future implementation. With the integration of Hancock Iron Ore operations from 1 July 2025, Atlas opted to defer the adoption of these platforms. This approach will allow the business to leverage existing systems and resources available within the combined organisation, ensuring a more efficient and coordinated rollout of supply chain risk management tools.</li> </ul>
<b>Heighten workforce awareness of modern slavery risk</b>	<ul style="list-style-type: none"> <li>To date, Atlas has focused its modern slavery training efforts on key teams involved in legal, contracts, and procurement functions, where the risks and responsibilities are most immediate.</li> <li>Broader workforce training programs were deferred in light of the Hancock Iron Ore integration from 1 July 2025. This will allow Atlas to leverage the expanded training resources and capabilities available within the combined business, ensuring a more comprehensive and consistent approach to modern slavery awareness across all levels of the organisation.</li> </ul>
<b>Review modern slavery risk response</b>	<ul style="list-style-type: none"> <li>Atlas considers its approach to managing modern slavery risks to be appropriate for a business of its size and operational scope.</li> <li>Looking ahead to the FY2026 reporting period, Atlas expects to strengthen its risk response further through the integration of processes and procedures as part of Hancock Iron Ore.</li> </ul>

<p><b>Increase awareness of grievance reporting channels</b></p>	<ul style="list-style-type: none"> <li>• This integration will provide access to enhanced resources and systems, supporting a more robust and coordinated approach to identifying and addressing modern slavery risks across the combined operations.</li> <li>• During the reporting period, Atlas promoted our grievance reporting channels such as the Safe2Say platform through internal communications, onboarding processes, and supplier engagement activities.</li> <li>• Clear guidance on how to access and use the platform has been made available across multiple channels, helping to ensure that individuals at all levels of the organisations understand their rights and know how to report issues confidentially and without fear of retaliation.</li> </ul>
<p><b>Strengthen collaboration and engagement</b></p>	<ul style="list-style-type: none"> <li>• During the reporting period, Atlas increased its engagement and collaboration with related bodies corporate, particularly in preparation for the Hancock Iron Ore integration with Roy Hill.</li> <li>• The collaborative effort has supported the ongoing refinement of due diligence frameworks and ethical sourcing practices.</li> <li>• By leveraging shared expertise and resources, Atlas is better positioned to strengthen its approach to identifying and managing modern slavery risks, with further process improvements under consideration for the next reporting period.</li> </ul>

## 5. Assessment of the effectiveness of actions

Atlas has reviewed the effectiveness of its systems and strategies to mitigate risk of the occurrence of modern slavery within its operations and supply chains. The results of the review are:

- Atlas did not identify any suppliers or contractors engaged in activities associated with modern slavery that required remediation during the FY2025 reporting period.
- No reports or complaints relating to modern slavery were received through whistleblower channels, including the Safe2Say platform, or via other means across Atlas’ operations or supply chains.
- A review of Atlas’ policies and procedures relevant to modern slavery risks confirmed that they continue to meet the requirements of the *Modern Slavery Act 2018* (Cth). Atlas remains committed to ongoing improvement and expects to update its Modern Slavery Policy and Modern Slavery Specification in the FY2026 reporting period to reflect changes in the company’s structure and operations in connection with the Hancock Iron Ore integration.
- A review of supplier purchase order terms and conditions identified certain suppliers engaged on outdated documents where expectations regarding modern slavery risk management could be more clearly articulated. These documents were updated to include our current standard modern slavery clauses that are aligned with legislative requirements and practical for implementation.
- Increased collaboration with related bodies corporate has led to the identification of new initiatives and potential enhancements to existing processes, particularly in the areas of supplier due diligence and ethical sourcing. These opportunities will be further explored in the upcoming reporting period.

## 6. Actions planned for the next Reporting Period

With the corporate changes associated with the Hancock Iron Ore integration, the transition to our new unified identity with Roy Hill, future Modern Slavery actions and initiatives will be implemented across the combined operations. This alignment will ensure a consistent and strengthened approach to identifying, assessing, and mitigating modern slavery risks throughout our expanded supply chains, leveraging the collective expertise, resources, and governance frameworks of both legacy organisations.

Hancock Iron Ore has planned the following activities to further embed modern slavery risk prevention:

**Table 3 – Hancock Iron Ore FY2026 Goals**

Goal	Description	Target Metric
<b>Strengthen Supply Chain Mapping</b>	Continue to strengthen our understanding of our higher-risk areas within the spend categories and provide better visibility of the Supplier supply chains for our Category Leads.	Supplier supply chain data available and monitored against higher-risk categories and countries.
<b>Modern Slavery Process Efficiency</b>	Alignment between the Policy, Procedure, Questionnaire, Risk Assessment Tool, Site Visit Checklist, Compliance Portal and Supply Chain Mapping to ensure the process is enabling the desired outcome in the most efficient way for Hancock Iron Ore.	Consistency, integration, and effectiveness of the Modern Slavery Risk Management tools and processes.
<b>Collaboration and Engagement</b>	Continue to participate in industry forums and engage with group insiders to enhance our knowledge within the Modern Slavery and Human Rights space.	Ongoing participation in Modern Slavery forums, including HRREC and Mineral Council of Australia and any new forums of relevance.
<b>Employee Training and Awareness</b>	Mandatory Modern Slavery training module for those in roles which may interface with the issue of Modern Slavery	All procurement roles completed the Modern Slavery training module

## 7. Relevant information

Atlas continues to build its understanding of modern slavery risks through active engagement with internal and external experts and relevant resources. Representatives regularly review guidance materials published by the Australian Border Force, other government agencies, and non-government organisations.

Atlas remains committed to staying informed about developments in modern slavery risk management. As part of this commitment, the Company strives to adopt best practice approaches in, identifying, addressing, and eradicating any instances of modern slavery.

## 8. Any other business

There is nothing additional to note for this reporting period. This Statement was approved by the Board of Atlas Iron Pty Ltd.

## 9. Consultation

Hancock Iron Ore operates as an integrated group, with group-wide policies, processes and systems that have been developed and applied consistently across all entities, ensuring a unified approach to managing modern slavery risks. The preparation of this Statement was led by the Hancock Iron Ore Commercial team, which is responsible for the organisation's modern slavery group, with teams across all areas of the business consulted and contributing to this Statement including, Corporate HR, Corporate Affairs Services, Sales & Marketing, Finance, Risk & Compliance, International Sourcing and Legal & Land Tenure.

This Statement was prepared in consultation with the Chief Commercial Officer, Chief Financial Officer, Head of Risk & Compliance, Head of Corporate Affairs, Head of HR, Manager Sales & Marketing, General Counsel, and representatives of our parent company, Hancock Prospecting Pty Ltd.

Signed by:



.....

Spiro Pappas  
Chairman  
Atlas Iron Pty Ltd  
(a Hancock Iron Ore company)

Date: 20 December 2025

# HANCOCK

## IRON ORE



**Hancock Iron Ore**  
**(Perth Airport Office)**

Tel: (08) 6242 1000

PO Box Locked Bag No.42

WELSHPOOL DC WA 6986

**Hancock Iron Ore**  
**(West Perth Office)**

Tel: (08) 6228 8000

PO Box 7071

CLOISTERS SQUARE PO WA 6850

[info@hio.com.au](mailto:info@hio.com.au)

[www.hancockironore.com.au](http://www.hancockironore.com.au)

# HANCOCK

## IRON ORE