



2022 MODERN SLAVERY STATEMENT

Acknowledgement

Metro Mining acknowledges the Ankamuthi People, the Traditional Custodians of this land on which Metro is privileged to operate. We pay our respects to all Ankamuthi Elders past, present and emerging. We acknowledge and respect the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples on these lands.

We also acknowledge and pay our respects to the Indigenous, Traditional and Tribal Peoples of the lands, waters and territories on which Metro Mining and Metro Bauxite Hills Operation is located and where we conduct our business around the world.

In the spirit of respect and reconciliation, we will continue to support initiatives that strengthen culture and ways of life.

About this Statement

Metro Mining's Modern Slavery Statement (Statement) outlines the Company's commitment and actions taken to identify, manage and respond to modern slavery risks in our operations and supply chain. The Statement has been prepared in accordance with Australia's *Modern Slavery Act 2018 (Cth)* (Modern Slavery Act) and relates to Metro Mining's financial year ending 31 December 2022 (FY2022).

This is Metro Mining's second year of modern slavery reporting and is in line with mandatory reporting under the Modern Slavery Act. All references to our, we, us, the Group, the Company, Metro Mining, refers to Metro Mining Ltd (ABN 45 117 763 443) and its subsidiary Metro Bauxite Hills Operations Pty Ltd (ABN 25 101 655 298).

Mandatory Criteria

The following table details each of the mandatory criteria in section 16 of the Modern Slavery Act and the relevant page number/s of the Statement addressing the criteria to demonstrate Metro Mining's compliance with the reporting requirements:

Mandatory Criteria	Page number/s
1. Identify the reporting entity	1
2. Describe the reporting entity's structure, operations and supply chains	2-3
3. Describe the risks of modern slavery practices in the operations and supply	3-4

4. Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes	4-5
5. Describe how the reporting entity assesses the effectiveness of its actions	5-6
6. 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)	6
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant	N/a

Our approach

Our purpose is to make a difference by producing essential minerals to improve lives now and for generations to come. We are trusted by our shareholders and partners to realise the potential of our resources. Operating in a manner that respects human rights and addresses the risks of modern slavery is fundamental to the way we do business, and we expect those we work with to do the same.

We require our suppliers to comply with lawful business practices and applicable Metro Mining policies, standards, procedures and processes, as relevant to the work they are performing for us, including our approach to modern slavery. Our response to managing the risks of modern slavery in our operations and supply chains continues to be guided by the United Nations Guiding Principles on Business and Human Rights.

We recognize the ongoing impacts of the COVID-19 pandemic and the escalation of the conflict in Ukraine have raised the risk of modern slavery to some of the world's most vulnerable people.

We continue to monitor the evolving situation in Ukraine and its human rights related impacts.

Overview of structure, operations and supply chain

Metro Mining Limited (ASX: MMI) is an Australian mining and exploration company based in Brisbane, Queensland. Metro's flagship project is the Bauxite Hills Mine, which is a single operating mine combining two Environmental Authorities covering the Bauxite Hills and Skardon River tenements. The Mine has an estimated Reserve of 89.5 million tonnes (Mt) and a total Resource of 124.5Mt and has been operating since April 2018. Ore from the Bauxite Hills Mine is shipped to meet China's growing bauxite market; where Cape York bauxite is well known and highly regarded.

Our vision is “To be a safe and efficient, low cost, bauxite producer, providing long-term benefits to our stakeholders”.

Our purpose is to provide low-cost bauxite to market, operating with respect and integrity towards our host communities, and in partnership with our clients, employees and customers, generate value to our stakeholders.

Metro Mining owns 100% of the Metro Bauxite Hills Operation located 95km north of Weipa in Queensland's Weipa Bauxite region. The Metro Bauxite Hills Operation has been in operation since 2018. The site is located on the country of one Native Title claimant group, the Ankamuthi People. At the Metro Bauxite Hills Operation, Metro Mining mines bauxite which is then shipped to China to make aluminium.

Our supply chain relates to the mining and shipping of bauxite to China. This includes suppliers of mining equipment (trucks, mobile plant, vehicles, fixed plant, etc), telecommunications, clothing, tools, PPE, etc. Certain services such as transshipping, camp facilities / catering, maintenance, IT services and cultural heritage are provided by Australian contractors on site, with management, administration, mining, operations and technical services activities undertaken by direct employees. In 2022 Metro Mining's expenditure on goods and services totaled \$212M. Australian-based suppliers represented 64% of this expenditure. The balance 36% largely relates to costs associated with ocean freight, with these vendors being based in either Singapore or Germany.

As of December 2022, Metro Mining directly employed 136 permanent and maximum term employees and with our contractors, engaged a workforce of over 300 people.

Modern slavery risks in our operations and supply chain

As evidenced above, the majority of Metro Mining's supply chain is located in Australia, and more specifically, Queensland. Our overall risk and exposure to modern slavery is relatively low. We acknowledge that for suppliers located internationally, in both Europe and Asia, ongoing analysis is required to identify potential categories which may cause, contribute or be directly linked to modern slavery.

Metro Mining recognises that its main modern slavery risks relate to the international vessels that are used in the transport of its product from Australia to China. Seafarers can be exposed to modern slavery (eg: forced labour, debt bondage) by the actions of the shipping lines and vessel owners. Modern slavery risk factors associated with marine crews include the following:

- use of low skilled labour

- use of migrant workers and visa-holder workers
- use of sub-contracting and outsourcing
- isolated working conditions (eg: at sea for extended periods of time)
- low margins; focus on cost reduction.

Modern slavery assessment and risk mitigation actions

In 2022, Metro Mining continued to assess its modern slavery risks through ongoing review of its internal systems and processes. This included routine reviews of modern slavery risks, to ensure risks are mitigated and managed effectively through appropriate controls.

To support the identification of potential high exposure regions/ products, Metro Mining conducts an initial assessment upon engagement of a supplier, with additional ongoing risk assessments for suppliers identified as higher risk (determined by country of origin or industry sector). This process enables Metro Mining to identify suppliers who have reported sourcing from high-risk areas and work with them to safeguard against potential instances of modern slavery.

Our standard contracts include modern slavery prevention provisions. These contracts were reviewed during the year. These clauses place specific obligations on contractors and suppliers to not engage in and mitigate risks relating to modern slavery.

In respect of the modern slavery risks associated with seafarers that are engaged on vessels transporting our product, the freight contracts that are entered into with the vessel owners require the crew to be engaged on a valid International Transport Workers Federation Agreement (ITF Agreement). This ensures the crew receive an internationally recognised minimum standard of pay and conditions.

We verify that the crew has a current and valid ITF Agreement as part of our vessel vetting process. In addition, vessels are randomly inspected by the Australian Maritime Safety Authority who will also seek confirmation of this. Vessels that do not have an ITF Agreement in place will be detained, which provides a strong incentive to vessel owners to comply.

Metro Mining acknowledges the significant impacts COVID-19 has placed on supply chain partners since the pandemic began in 2020. The Company will continue to work with and support these partners, both in Australia and internationally, during this challenging time to ensure these impacts do not enable increases in modern slavery practices to emerge.

Governance

Metro Mining recognises it has a role to play in identifying and influencing its supply chain to support the elimination of modern slavery practices, which

include slavery, servitude, human trafficking, debt bondage, child labour, deceptive recruiting for labour or services and forced or compulsory labour. Metro Mining opposes all forms of slavery in our operations and in the operations of our suppliers, with the health, safety and wellbeing of our workforce and associated stakeholders, being our highest priority.

Metro Mining's internal policies sets the standards we expect of our workforce whilst ensuring we uphold relevant laws and regulations applicable to our business. Given all sites are located within Australia, together with existing State and Commonwealth regulatory controls and reporting mechanisms, we believe there is minimal risk of causing, contributing or being directly linked to instances of modern slavery within our operations.

Our internal values, policies and procedures underpin our business culture and social performance through the application of the Policies outlined:

1. Share Trading Policy
2. Occupational Health and Safety Policy
3. Community and Social Responsibility Policy
4. Environmental Policy
5. People Policy
6. Diversity Policy
7. Anti-Bribery and Corruption Policy
8. Mental Health and Wellbeing Policy
9. Continuous Disclosure Standard
10. Whistle-blower Standard

Metro Mining's Whistle-blower Standard outlines the Grievance and Remediation process for all employees and contractors.

Metro Mining's Board of Directors is committed to fostering a culture of compliance, ethical behaviour and good corporate governance, assisted by its Executive Team, to fulfil the oversight of Metro Mining's management of modern slavery risks. We believe that good governance is the collective responsibility of all, being management, employees, suppliers, contractors and those we do business with. It forms part of our core values and application of responsible business practices.

Assessing effectiveness

Metro Mining continues to take proactive steps in identifying, and therefore reducing, any risks of modern slavery within our supply chain. The Company is committed to being transparent throughout its business dealings. In 2022, there were no instances of modern slavery identified within the supply chain

during 2022 and no reports of modern slavery raised by a whistleblower or through a grievance process.

With oversight by our Audit & Risk Committee, we will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners and undertaking a regular review of our processes. Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to modern slavery.

Consultation

We consulted with the relevant companies we own or control in the development of this Statement.

Looking Ahead

As highlighted above, continuous improvement is important to manage and mitigate the risk of modern slavery. In 2023, Metro Mining will:

- undertake a review of our policies, procedures and contracts to ensure they appropriately identify, manage and mitigate modern slavery risks
- ensure our reporting and grievance mechanisms are communicated to our employees
- support any at risk suppliers or shipping partners, with increased engagement and training
- consider the introduction of KPIs to measure our response and level of effectiveness in managing modern slavery risks.

Feedback

We value all feedback on the content of this Statement, please visit the Metro Mining website, www.metromining.com.au, to provide feedback or request additional information.

Approval of Statement

This Statement has been approved by the Board of Metro Mining as the parent entity on 20 June 2023.

This Statement is signed by Simon Wensley in his role as the CEO and Managing Director of the parent entity on 20 June 2023.



Simon Wensley
CEO and Managing Director
Metro Mining Limited