

Modern Slavery Statement

*‘Founded by
the
community of
Christmas
Island, we
recognise the
inherent
dignity of all
people and
are
committed to
respect and
promote
human rights,
including the
rights of any
community
where we
operate.’*

Reporting Entities

This Modern Slavery Statement (**Statement**) is made jointly by PRL Global Limited (formerly CI Resources Limited) ACN 006 788 754 (**PRLG**) and its wholly owned subsidiary, Phosphate Resources Limited ACN 009 396 543 (**PRL**), for the financial year ending on 30 June 2024 (**Reporting Period**).

PRLG and PRL are both reporting entities pursuant to the *Modern Slavery Act 2018 (Cth)* (**Act**).

Unless the context otherwise requires, a reference to ‘we’ or ‘our’ in this Statement refers to both PRLG and PRL.

This Statement has been approved as a standalone document by the board of directors of PRLG on behalf of PRLG and PRL and is hereby signed by the Chair of the board of directors.



David Somerville
Chair of PRLG

Introduction

Why do we make this Statement?

The Act came into force on 1 January 2019 and established a national modern slavery reporting requirement on entities that operate in Australia with annual consolidated revenues of A\$100 million or more. The reporting requirement recognises the need for Australian businesses to identify and address their modern slavery risks and maintain responsible and transparent supply chains. Reporting will increase business awareness of modern slavery which will, in turn, lead to improved standards and practices.

This statement is the fifth such statement PRLG and PRL are making in compliance with that reporting requirement and sets out our actions to assess and address modern slavery risks in our operations and supply chains.

In responding to the requirements of the Act, we have paid careful attention to the *Modern Slavery Act 2018 Guidelines for Reporting Entities (Guidelines)*.

What is Modern Slavery?

Modern slavery is broadly defined by the Act to describe serious exploitation of people and situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. This includes trafficking in people, slavery, slavery-like practices (such as forced labour, forced marriage and debt bondage) and the worst forms of child labour.

It does not include practices such as substandard working conditions or underpayment of workers, but it is acknowledged that these practices may also be harmful and illegal and may be present in some situations of modern slavery.

Who are we?

PRLG is an ASX-listed company with its head office in Perth, Australia.

PRLG is a diversified industrial company with various interests, which it holds through its wholly owned subsidiary, PRL. Those interests include phosphate mining, infrastructure, fuel services, shipping, properties and agricultural interests spread across Christmas Island, Western Australia, Singapore and Malaysia.

To support the structure of the business, we have established wholly owned subsidiary companies that are registered in Australia, Singapore and Malaysia.

Further, we have controlling interests in Liven Nutrients Pte Ltd and Kemoil SA. Liven Nutrients Pte Ltd is a Singapore registered company that trades fertiliser globally, and Kemoil SA is a Swiss registered company that trades in bulk refined fuel oil in Africa.

In January 2024 we completed the divestment of our palm oil operations in Malaysia.

Our operations and that of our subsidiaries include:

- operating a phosphate mine on Christmas Island, including mining, processing and selling phosphate rock and phosphate dust
- producing, sourcing, trading and selling fertiliser products
- managing shipping for mining operations and ancillary services
- fuel services for Christmas Island, including diesel supply, bunkering services, operating a fuel station, and maintain fuel infrastructure
- marine pilotage services
- (up to January 2024) producing, processing and selling of palm oil products.
- asset management services including fire protection, pest control, cleaning grounds maintenance, facility management and project management

- ownership of residential, commercial and agricultural properties supporting our operations
- logistics and supporting the movement of products between suppliers and customers.

Further detail of our group structure is available in our most recent Annual Report¹.

Our supply chain

To assist us, we work with an extensive network of suppliers. In many cases we have long-standing relationships with these businesses to allow us time to build trust in our supply chain.

In the Reporting Period, we had approximately 53% of tier 1 suppliers were based in Australia, with the residual mainly coming out of our operations and activities in South East Asia and Europe.

Our largest categories of procurement spend comprise energy, fertiliser, shipping, maintenance and agricultural products.

Managing the risks of modern slavery

We have been built on strong social and environmental foundations with a track record of supporting the local communities where we operate.

However, we recognise that there is a risk of Australian businesses being exposed to modern slavery, especially those Australian businesses that have a strong presence in high-risk sectors and industries. In addition, many Australian businesses have supply chains that extend throughout Asia-Pacific, which is identified as being a 'high risk' region².

In our operations

Considering the nature and location of our operations and that of our subsidiaries, we acknowledge that there is a risk – particularly in relation to supply chains – of causing or contributing to modern slavery through the use of labour in vulnerable communities, high-risk locations or through the engagement of personnel through labour hire arrangements.

Although some of our controlled entities operate in Malaysia and China, more than 90% of our entire group's personnel in the Reporting Period were Australia-based, Singapore-based or Swiss-based, which significantly reduces the geographical risk. However, as our business continues to grow both locally and globally, we are aware of the risks and the need to appropriately address the risks.

In our supply chain

We previously reported that we have conducted a desktop assessment of our potential modern slavery risks in Tier 1 of our supply chain. This assessment included identifying the relative risk of the countries in which we operate using the Global Slavery Index (GSI). The outcome of the assessment is as follows:

¹ Available at <https://prlgroup.com.au/investors/announcements-and-reports/reports/>

² *Global Slavery Index*, <https://www.globalslaveryindex.org/2018/findings/regional-analysis/asia-and-the-pacific/>

Risk of modern slavery	Country-of-origin
Unlikely	Australia, Singapore, Japan, Denmark, Netherlands, Estonia, France, UK, Switzerland
Possible	Malaysia, China, Hong Kong, Indonesia, Egypt, Dubai, Oman, Bahrain, Qatar, Vietnam, UAE, Brunei, South Korea, Benin
Likely	Senegal
Almost certain	-

We and our controlled entities operate using an extensive network of suppliers including in Malaysia, China, Hong Kong, Indonesia, Egypt, Dubai, Oman, Bahrain, Qatar, Vietnam, UAE, Brunei, South Korea, Benin and Senegal. We recognise the risk of sourcing goods and services from these jurisdictions, including the risk of worker exploitation.

PRLG and PRL are committed to limiting the risk of modern slavery occurring within the business, infiltrating its supply chains or through any of its business relationships.

Governance Policies

In dealing with the specific risk of modern slavery, we have continued our work to identify areas of greatest risk, and we continue to review our policies and procedures to ensure they reflect our commitment to minimise the risk of modern slavery in our operations and supply chains.

In doing so, we have assessed the risk of modern slavery practices based on the potential to cause, contribute to or be directly linked to modern slavery through our operations and supply chains, as defined in the Guidelines.

The following policies are considered most relevant to preventing modern slavery:

Code of Conduct	PRLG and PRL are committed to high standards of integrity and ethical conduct in all business practices. The Code of Conduct reflects this commitment and provides the benchmark for appropriate behaviour and conduct across the group. All employees and representatives are required to conduct themselves and undertake all business in accordance with the Code of Conduct.
Supplier Code of Conduct	This policy provides practical guidance to PRLG and PRL's suppliers in supporting our pursuit of minimising the risk of modern slavery in our supply chains. Central to the Supplier Code of Conduct is an expectation that all suppliers operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business.
Ethical Procurement Policy	This policy reflects our commitment to be socially responsible in the way we source goods and services through our supply chain.
Whistle Blower Policy	This policy has been developed to encourage employees, suppliers, contractors, customers and other persons who have dealings with us to raise concerns and report instances of unethical, illegal, socially irresponsible or fraudulent conduct, where there are reasonable grounds to suspect such conduct, without fear of victimisation or other disadvantage.
Health and Safety Policy	This policy sets out PRLG's and PRL's commitment to providing a safe place and safe systems of work across the group. The policy is designed to mitigate the risk of workforce exposure to health and safety risks including psychosocial risks

In addition, we have developed various employment policies, including our Diversity Policy, that supports our responsibility to ensure all employees are treated with fairness and respect as well as our responsibility to maintain a safe, diverse and inclusive workplace.

General Trading Terms

In 2024 we continued to review and update our general trading terms to place obligations on suppliers to comply with the Supplier Code of Conduct and otherwise comply with the Modern Slavery Act.

Collective Agreements

We are committed to engaging with our staff in relation to their terms of employment and, to that end, we have in place two enterprise agreements, which are registered with the *Fair Work Commission*, which cover the majority of our employees.

Training

We have prepared modern slavery training materials which we use to educate our workforce about the risks of modern slavery.

Due Diligence

As we diversify and invest in new businesses and in new regions, our due diligence processes have developed to include steps to identify the risks of modern slavery.

In this context the Environmental, Social and Governance Sub-Committee Charter was amended to provide the Sub-Committee with responsibility for oversight of the preparation of Modern Slavery Statements.

During the financial year ending 30 June 2025, we intend to undertake some targeted auditing of key suppliers in respect of modern slavery risks.

Prospective actions and initiatives to be taken during FY 2025/26

During the next reporting period, we plan to continue to:

- implement and review our policies and procedures that impact on modern slavery risk and how best to monitor compliance
- assess suppliers, including compliance with our Supplier Code of Conduct
- develop and provide training for our procurement and human resources staff
- embed modern slavery risk assessment and policies in our controlled entities
- develop and release communications for the purpose of increasing awareness and understanding of modern slavery
- develop targeted auditing of key suppliers in respect of modern slavery risks and compliance.

The effectiveness of the actions we have taken

We recognise the importance of monitoring how effective our anti-modern slavery processes.

Our current focus is the assessment of our suppliers' modern slavery risks with the aim of building partnerships with businesses that are committed to operating at the ethical and socially responsible standards required by the Supplier Code of Conduct. No breaches of the Supplier Code of Conduct have been reported by suppliers during the Reporting Period.

Our Whistleblower Policy allows employees, stakeholders and other third parties to raise concerns about modern slavery and is a measure that we can use to assess the effectiveness of the actions we have taken to mitigate the risk of modern slavery. No modern slavery complaints or issues have been raised by employees, stakeholders or other third parties during the Reporting Period.

PRLG and PRL are committed to excluding modern slavery from the business, and the Board assesses the business's performance in this area on a regular basis. During FY 24/25 we will be exploring additional opportunities to measure performance against our modern slavery commitments.

Our consultation with controlled entities

PRLG is the holding company of PRL and the two entities have consulted directly in relation to modern slavery risk.

PRLG is the ultimate parent entity of Phosphate Resources Malaysia Sdn Bhd, Phosphate Resources Properties Pty Ltd, Indian Ocean Oil Company Pty Ltd, CI Maintenance Services Pty Ltd, Indian Ocean Stevedores Pty Ltd and PRL Shipping Pty Ltd. Each of these subsidiary companies is required to adopt the PRLG policies and procedures.

In addition, PRL has a controlling interest in two joint ventures being Kemoil SA registered in Switzerland and Liven Nutrients Pte Ltd registered in Singapore. Prior to entering into these joint ventures, PRL conducted high-level surveys of both Kemoil SA and Liven Nutrients Pte Ltd as to the risks of modern slavery in relation to their respective operations and supply chains.

In January 2024 we divested our Malaysian based palm oil business. Prior to divestment, the palm oil business obtained Responsible Sustainable Palm Oil (**RSPO**) accreditation and Bureau Veritas Certification for production of crude palm oil and palm kernel at the Cheekah-Kemayan Palm Oil Mill. The RSPO sets environmental and social criteria which producers must comply with in order to market Certified Sustainable Palm Oil (**CSPO**). These criteria can help to minimise the negative impact of palm oil cultivation on the environment and communities in palm oil-producing regions, including modern slavery. RSPO is committed to the protection of human rights through its Human Rights Working Group³.

³ <https://rspo.org/human-rights-and-social-standards>