



IMAGE
RESOURCES



**MODERN SLAVERY
STATEMENT – CY2023
IMAGE RESOURCES NL
ABN: 57 063 977 579**

ABOUT THIS STATEMENT

This Modern Slavery Statement (**MSS**) is made on behalf of Image Resources NL (ABN 57 063 977 579) and its wholly owned subsidiaries Craton Resources Pty Ltd (ACN 648 631 314), Titon Resources Pty Ltd (ACN 655 038 083), Titan-DR Resources Pty Ltd (ACN 657 802 750) and Titan-SR Resources Pty Ltd (ACN 657 896 314) (collectively **Image** or **the Company**).

Reporting period

The reporting period for this MSS is 1 January 2023 through 31 December 2023 (**CY2023**). It is submitted in compliance with modern slavery reporting requirements under Australia's **Modern Slavery Act 2018 (Cth)**. This MSS includes progress on proposed actions outlined in the Company's CY2022 MSS, a new Modern Slavery Approach and actions proposed for CY2024.

Approval

This statement has been endorsed by the Chief Executive Officer and approved by the Board of Directors of Image Resources on 14 June 2024.

A handwritten signature in blue ink, appearing to read 'Patrick Mutz', is positioned to the left of a vertical yellow line.

Patrick Mutz

Managing Director & Chief Executive Officer

Image Resources NL

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INTRODUCTION

Since Image transitioned to an active mining company in December 2018, it has taken a proactive approach to meeting or exceeding its commitments in the areas of safety, environmental protection, and social engagement, and has adopted a continuous improvement approach through its policies, procedures, processes, and practices. The Company has been proactively engaged in environmental, social and governance (**ESG**) practices informally since 2019 and in CY2023 formally adopted ESG practices and commitments resulting in the filing of an ESG and Sustainability Report covering the years CY2019 through CY2022. A Sustainability Report for CY2023 is due to be filed in June 2024.

Per the *UN Guiding Principles on Business and Human Rights* (UN Guiding Principles), “Business enterprises should respect human rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.”¹

As a modern mining company in Australia, with a wide range of stakeholders, Image understands it has an ethical responsibility to proactively contribute to the sustainability of the communities in which we operate and to engage positively and influentially with other companies and stakeholders. This includes the effective monitoring of modern slavery risks throughout our operational sphere and supply chain, and if and as necessary the management and mitigation of potential risks.

Such an approach begins with effective governance including formal policies and procedures and a formal code of conduct which require Image’s directors, officers, employees, and contractors to observe high standards of business conduct and ethics which in turn, serve to promote, honesty, integrity, respect, and fairness.



¹ United Nations Human Rights Office of the High Commissioner, “Guiding Principles on Business and Human Rights.” (2011). 13.

COMPANY OVERVIEW

With its corporate headquarters located in West Perth, Western Australia, Image is an Australian public company listed on the Australian Securities Exchange (ASX: IMA). The Company's primary business is mining and processing mineral sands ore and producing a heavy mineral concentrate for export to global markets, with a focus on sales into China. All mining and processing operations are located in Western Australia.

In CY2023, the Company operated a single mining operation and employed approximately 66 employees directly and upwards of 140 contractors and consultants throughout its mining, development, exploration, and corporate functions. Some of these employees also included Traditional Owner (TO) Cultural Monitors required for observing exploration ground disturbance works on tenements that hold a Heritage Agreement with respective Native Title groups. These TO's have been hired as casuals on an ongoing basis as part of the Companies Cultural Monitoring Program that ensures the Traditional Custodians of the land are able to take part in and observe works being done on their Traditional Lands.



COMPANY STRUCTURE

Image is owned by its shareholders and controlled by an independent board of directors. The Company controls four wholly-owned subsidiary companies as shown in **Figure 1**. Mining and processing operations during CY2023 were conducted directly under Image Resources NL. Future operations are planned to be operated under the various wholly-owned subsidiaries. All subsidiary companies have the same directors which are directors of Image Resources NL, and all subsidiaries' activities are conducted and controlled by Image Resources NL's policies and employees, including procurement personnel.

Figure 1 – Company Structure

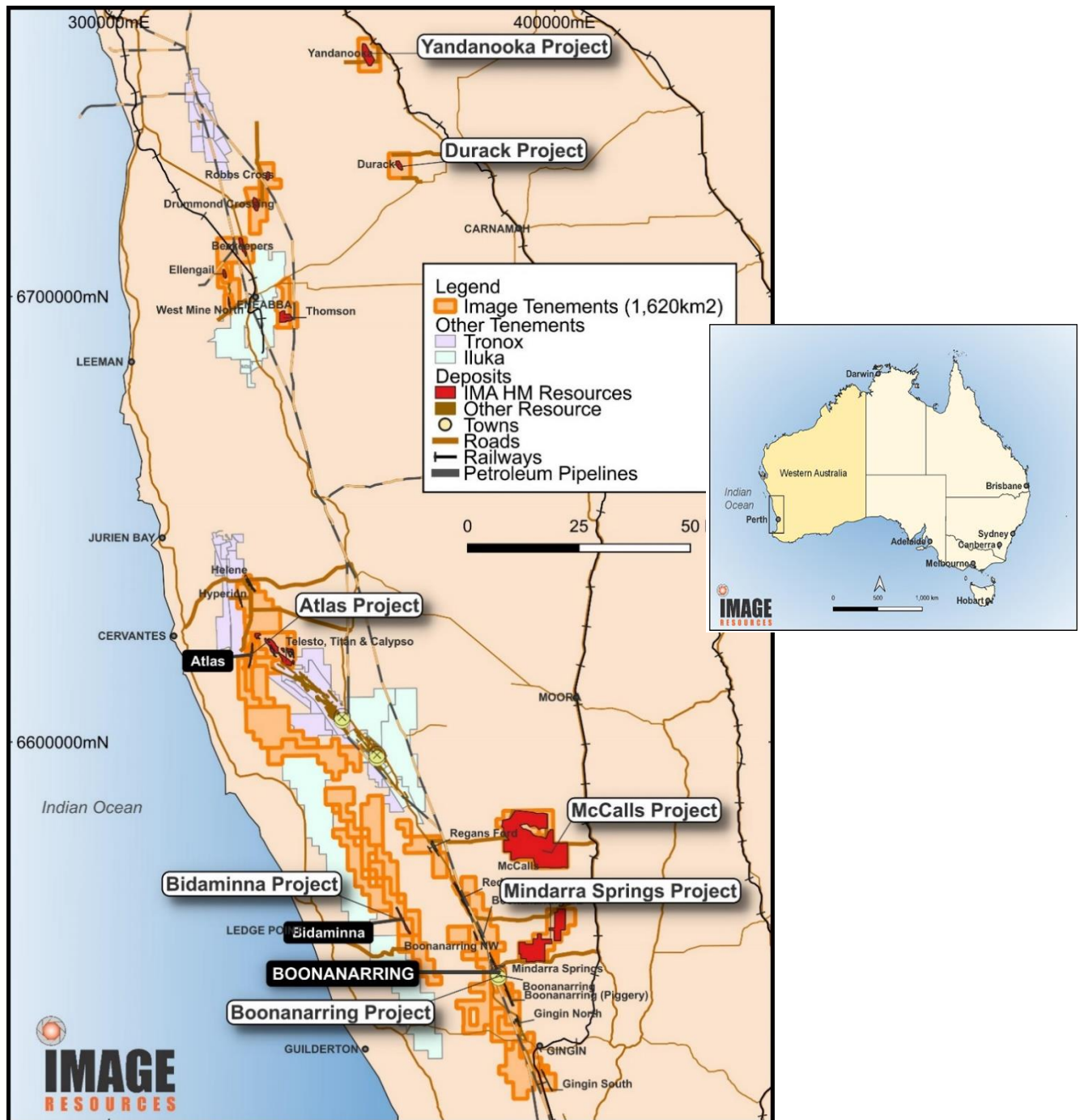


COMPANY OPERATIONS

The Company controls a portfolio of 100%-owned exploration licences and mining leases (**Tenements**) focused on heavy mineral sands. All Tenements are located in the North Perth Basin in Western Australia, stretching approximately 80-200km north of the capital city of Perth. See **Figure 2**.

During this reporting period (CY2023) Image operated a single mining operation (Boonanarring project) located 80 kilometres north of Perth which wrapped up production in the latter half of CY2023. The Company is also engaged in typical pre-development drilling and feasibility studies on three of its other project areas associated with the tenements.

Figure 2 – Image Tenements



2023 ACTIONS AND ACHEIVEMENTS

Under its CY2022 MSS, the Company outlined several actions to be taken in CY2023 to assess and minimise the risks of modern slavery practices from its supply chain. All actions outlined to be achieved in CY2023, as shown in **Figure 3** below, were completed.

Figure 3 – Actions Completed in CY2023



Image is taking a company-wide approach to the management of its modern slavery risks, which starts with building awareness across our teams. For CY2023 much of the Company's focus was on modern slavery awareness training across various levels of the organisation, following on the success of modern slavery training for the Company's Directors. By providing this training to employees, we were able to build on our culture of ethical responsibility and equip employees with the tools and knowledge to help identify potential modern slavery risks.

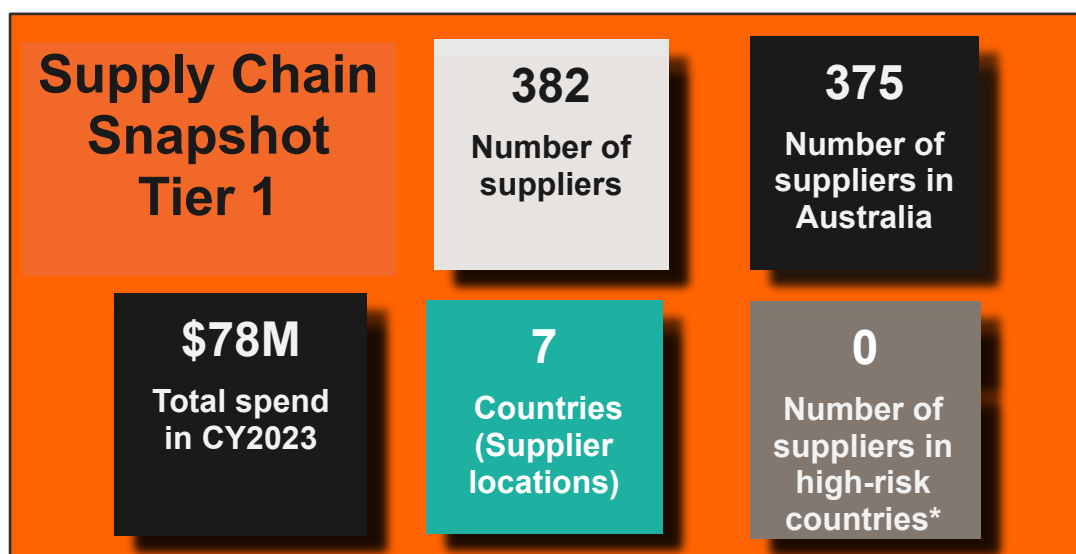
Continuing with CY2022's development of the modern slavery self-assessment questionnaire for Tier 1 suppliers (direct suppliers to Image for final products or services), Image distributed these self-assessments to its Tier 1 suppliers in CY2023 and has logged the results into a modern slavery register. The results of the self-assessment indicated there were no high-risk suppliers in the Company's Tier 1 supply chain in CY2023.

As a next step in meeting compliance with the Modern Slavery Act (2018), the Company will be implementing and issuing modern slavery assessments through iPro software for its suppliers in CY2024. Using the iPro software approach is intended to provide a more systematic and streamlined assessment process as well as providing a path to the assessment of Tier 2 suppliers (suppliers of components or services to Tier 1 suppliers) and Tier 3 suppliers (suppliers of components or services to Tier 2 suppliers). Information collected in this manner should create a more sustainable monitoring procedure to ensure Image identifies potential high and medium-risk suppliers, and if so identified, can provide those suppliers with educational information to bolster their own commitments to eliminate modern slavery in their operations and/or supply chains.

OUR SUPPLY CHAIN

Figure 4 provides a high-level overview of Image's Tier 1 suppliers.

Figure 4 – Tier 1 Supply Chain CY2023



* Figure 4 - Analysis based on information obtained through the Global Slavery Index (Walk Free, 2023)

Figure 4 illustrates that 98% of the Company's Tier 1 suppliers are Australian based, a high proportion of which are located in Western Australia and are reputable companies that have been successfully operating in the mining sector for decades.

A breakdown of our major categories of goods and services that support our operations including geographic locations of suppliers, percentage of total spend and whether location countries are high-risk, is provided in **Table 1**. This data provides additional detail that corroborates that none of Image's Tier 1 suppliers are located in high-risk countries.

SUPPLY CHAIN RISKS

Given the relatively small scale of Image's operations, and the locations of those operations (all located in Australia), Image is confident it **does not directly cause or contribute** to any modern slavery practices.

While we believe that the overall risks of Image's Tier 1 supply chain harbouring modern slavery practices remain minimal, we acknowledge that suppliers to our Tier 1 suppliers (Image's Tier 2, Tier 3 etc. suppliers) may source goods and services from countries that are considered to be at higher-risk of modern slavery practices.

Accordingly, understanding the potential risk that Image may unknowingly be **directly or indirectly linked** to modern slavery practices through activities of another entity we have a business relationship with, will continue to be the focus for the business through our next stages of supply chain assessment and proposed measurable actions. This includes (but is not limited to) adopting software solutions that are designed to drive modern slavery risk audits down the supply chain to lower tier suppliers, as well as establishing procedures for assessing potential new suppliers (and their suppliers) before the new suppliers are utilised by Image.

Table 1 – Tier 1 Supply Chain percentage and Location

2023 Tier 1 Supply Chain Goods and Services by Category, Spend & Location

Supplier Category	% of spend	Location of Supplier	High Risk Country*
Contractors	55.5%	Australia	✗
Capital Equipment	9.2%	Australia	✗
International Shipping	8.9%	Singapore, Denmark,	✗
Mining Operations	8.1%	Australia	✗
Transport	7.6%	Australia	✗
Consultants	4.9%	Australia	✗
Drilling & Exploration	4.0%	Australia	✗
Corporate Goods and Services	0.6%	Australia UK, Hong Kong, China	✗
Computer Hardware/Software Goods and Services	0.6%	Australia USA	✗
Vehicle & Fuel	0.3%	Australia	✗
Labour Hire	0.2%	Australia	✗
Personal Protective Equipment	0.1%	Australia	✗

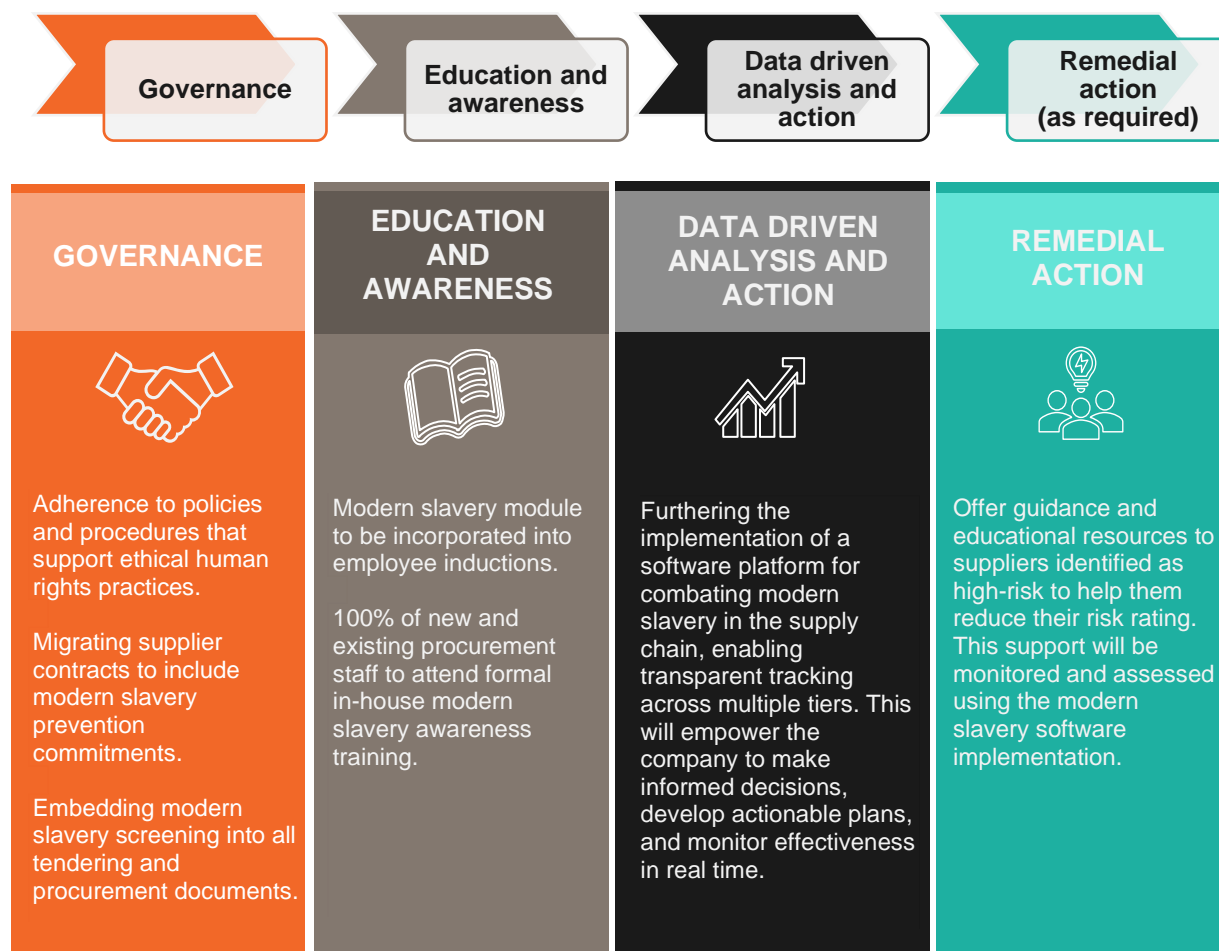
* Analysis based on information obtained through the Global Slavery Index (Walk Free, 2023)

Image is also actively engaged in feasibility studies for projects associated with the Company’s “Chapter 2” growth and sustainability strategy. Chapter 2 ambitions include operating multiple mines simultaneously, producing multiple products marketed globally, plus investigating value-adding through the conversion of ilmenite to synthetic rutile. Through this expansion of operations there will be a larger number of new suppliers and therefore a greater risk that new suppliers could be in the high-risk category with respect to modern slavery. To moderate this risk, Image is adopting appropriate wording in its tender documents and contracts that the supplier/contractor must demonstrate compliance with the Modern Slavery Act.

2024 ACTIONS AND MEASURES OF EFFECTIVENESS

Image’s companywide approach to addressing modern slavery risks is continuing to be driven around **four** key themes which comprises Image’s formalised **Modern Slavery Approach**.

IMAGE’S MODERN SLAVERY APPROACH



APPLYING THE MODERN SLAVERY APPROACH - KEY ACTIONS FOR 2024

Image’s Modern Slavery Approach will be underpinned and driven by a largely automated, systematic, structured approach focused on supply chain transparency and management beyond Tier 1 suppliers. This approach is proposed to be consistently applied through licensed and specialised commercially available software specific to modern slavery risk assessment and mitigation, which the Company has procured in iPro’s Modern Slavery Risk Assessment. This software will also assist in guiding documented high-risk suppliers, who have completed their risk assessments, on what they can do to implement their own modern slavery strategies.

CONSULTATION WITH OWNED/CONTROLLED ENTITIES

All the Company's 100%-owned and controlled subsidiary entities are private entities set up to hold certain project assets as subsets of the Company's overall portfolio of mining tenements, licences and/or mining operations. All subsidiary entities (shown in Figure 1) have common directors with the listed parent entity Image Resources NL. None of these subsidiary entities have any operational functions or employees at this time. Procurement for materials or services for these entities (if any) is conducted by procurement employees of Image Resources NL.

During the reporting period this statement covers, we actively engaged and consulted with all companies we own or control in the development of this statement. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates on modern slavery.

OTHER INFORMATION

Image Resources NL acknowledges that its workforce is its most valuable asset. The company places great importance on the contributions of its employees and is committed to ensuring fairness and equity for all its employees, contractors and stakeholders in general.

A significant portion of Image's expenditure is allocated to labour costs, covering both direct employment and engagement with Tier 1 suppliers such as contractors and consultants. Operating solely within Western Australia's mining sector as a publicly listed entity, the likelihood of modern slavery practices within Image's workforce, whether direct or indirect, is deemed extremely low.

Image prides itself on being an equal opportunity employer, striving to offer competitive remuneration aligned with industry standards in Australia's highly competitive mining sector. Employee performance and compensation are regularly reviewed, with records maintained on turnover rates and gender diversity. However, no specific targets have been set due to the company's relatively small workforce and uncertain growth trajectory.

Recruitment procedures are guided by formal policies promoting diversity, employment equality, and affirmative action, with a focus on indigenous employment opportunities. These policies aim to prevent discrimination based on various factors including gender, age, nationality, race, religion, cultural background, sexuality, or physical ability. Additionally, they ensure compliance with Western Australian laws prohibiting discrimination on grounds such as sex, marital status, pregnancy, sexual orientation, family responsibility, race, religion, political conviction, impairment, age, or gender history, while also addressing issues such as sexual harassment and victimization.