

Modern Slavery Statement 2024



Who we are

IGO Limited (IGO) is an ASX listed company focused on creating a better planet for future generations.

Led by our purpose and driven by our unique values, we are discovering, developing and producing products critical to the clean energy transition, and are doing so safely, sustainably and ethically.

Our lithium interests are held via our 49% shareholding in Tianqi Lithium Energy Australia Pty Ltd (TLEA), an incorporated non-operated joint venture with our partner Tianqi Lithium Corporation (Tianqi). TLEA owns upstream and downstream lithium assets, including a 51% stake in the world-class Greenbushes Lithium Operation and a 100% interest in the Kwinana Lithium Hydroxide Refinery, both located in Western Australia.

IGO owns and operates the Nova Nickel Operation, an underground nickel mining and processing facility located in Western Australia. During 2024, the Forrester Nickel Operation will reach the end of mine life and transition into care and maintenance.

IGO is growth focused, and has an enduring commitment to investing in exploration to discover the mines of the future, and ensure the world has a sustainable supply of clean energy metals into the future.

Acknowledgements

IGO's head office in Mindeerup (South Perth) lies on the banks of the Derbarl Yerrigan (Swan River) on Whadjuk Boodjar, the lands of the Whadjuk Noongar People. IGO would like to acknowledge and pay respects to Whadjuk Noongar People and other Traditional Owner groups whose lands we are privileged to work on and acknowledge their strong and longstanding cultural connections to their ancestral lands. IGO would also like to acknowledge all Aboriginal and Torres Strait Islander peoples who work for us, with whom we work and upon whose lands we operate, and we pay our respects to Elders, past and present.

2024 Annual Reporting Suite

Available to view and download from our website

www.igo.com.au



Annual Report



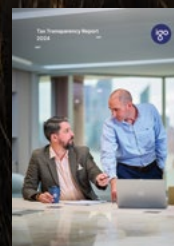
Sustainability Report



Sustainability Databook



Corporate Governance Statement



Tax Transparency Report



Modern Slavery Statement

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1. Executive Summary



Our Human Rights Policy supports our Code of Conduct and commits IGO to upholding the fundamental human rights of all people with whom we engage, including putting in place standards and procedures which aim to stamp out unethical practices from our global supply chain.

We seek to:

- Identify risks of modern slavery in our operations and supply chains through the adoption of responsible governance, appropriate risk assessment and due diligence processes, and remediation activities (where applicable).
- Undertake ongoing training and collaboration opportunities to support driving change in our industry.

This is IGO's fifth statement, published in accordance with the *Australian Modern Slavery Act 2018* (Cth) (Act) for the financial year ending 30 June 2024 (FY24). The statement details the steps IGO has taken to assess modern slavery risks within our operations and supply chains, the actions we have taken to address those risks, and how we evaluate the effectiveness of our actions.

United Nations Sustainable Development Goals (UNSDGs)



UNSDG Target No.

8.7

Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers and by 2025 end child labour in all its forms.

IGO proudly supports the UNSDGs. Our work to address modern slavery risks in our operations and supply chains contributes to eradicating modern slavery.

1.1 Reporting Entities

This statement is a consolidated joint statement that covers the activities of IGO and all requisite reporting entities within the IGO Group.

(Refer to section 6 for more information)

The modern slavery risks and actions taken associated with projects, joint ventures (JVs) or companies which we did not operate during the reporting period (including IGO's Lithium Business) are not included in this statement.

1.2 Mandatory Criteria

Legislative Requirement	Section	Page(s)
Identify the reporting entity	1.1	3
Describe the reporting entity's structure, operations and supply chains	3	8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	4.2	18
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	4	14
Describe how the reporting entity assesses the effectiveness of these actions	5	26
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	28
Additional Information		
A summary of our achievements in FY24	1.3 - 1.5	3-4

1.3 Our Progress

IGO promotes a continuous review and improvement approach to our management of modern slavery risks. We recognise that the risks in our operations and supply chains are constantly changing and acknowledge that we have more work to do.

FY24 was a transformative year for IGO in which we experienced a reduction of our workforce, operations and projects. This included the transition of our Cosmos Project into care and maintenance in Quarter 4 of FY24, as well as working on transitioning our Forrestania Operation into care and maintenance, as it neared its end of mine life. These operational changes were followed by a restructure of our corporate function.

Furthermore, we have also worked through a substantial amount of change in our business, including the continuing restructure of key systems and processes such as our risk management framework.

We remain committed to making the changes necessary to address modern slavery risks in our business across five key areas:

- Corporate Governance
- Risk Assessment and Due Diligence
- Remediation
- Training
- Collaboration

		FY22	FY23	FY24
Corporate Governance	Responsibility	●	●	●
	Strategy	●	●	●
	Policy Commitment	●	●	●
	Policy Implementation	●	●	●
	Reporting Processes	●	●	●
Risk Assessment and Due Diligence	Risk Assessment Processes	●	●	●
	Employment Practices	●	●	●
	Supplier Engagement and Due Diligence Processes	●	●	●
Remediation	Responsible Purchasing Practices	●	●	●
	Grievance Mechanisms	●	●	●
Training	Response and Remediation Framework	●	●	●
	Employee Training	●	●	●
Collaboration	Supplier Engagement	●	●	●
	Cross-functional Collaboration	●	●	●
	External Collaboration	●	●	●

● Not yet addressed ● Developing ● Implementing ● Monitoring

1.4 FY24 Overview

We have not identified any actual instances of modern slavery in our operations or supply chains in this reporting period.

In FY24 IGO's focus has been to:

- Maintain our existing modern slavery risk assessment and management practices in relevant areas of our business; and
- Utilise a modern slavery risk screening tool to improve our Initial Risk Assessment process.

1.5 FY24 Actions

Throughout the reporting period, we undertook the following actions:



Reviewing our commercial practices and decision-making processes



Utilising a modern slavery screening tool to provide better insights into our operational and supply chain



Developing delivery strategy for targeted, risk-based training for departments within our business



2. Our Purpose, Strategy and Values



2.1 Our Purpose

We believe in a world where people power makes amazing things happen. Where technology opens up new horizons and clean energy makes the planet a better place for generations to come.

Our people are bold, passionate, fearless and fun – we endeavour to be a smarter, kinder and more innovative company.

Our teams are finding and producing the products that will make energy storage mobile and efficient as we seek to contribute to the way communities grow and prosper. We believe in a clean energy future and are delivering the products needed for tomorrow's battery systems.

2.2 IGO Strategy

During 2024, IGO has completed a review of our strategy, informed by a detailed analysis of key battery materials commodity economics, end use market dynamics, the implications for the mining sector and IGO's strengths and natural advantages.

Led by our purpose, which remains unchanged, our strategy will remain focused on our people and stakeholders, working safely, ethically, sustainably, and reliably.

We see value in upstream mining and where we expect to generate most value is through a disciplined focus on low-cost assets. It's also where we can leverage IGO's existing skills across mining, processing, operating and technical disciplines, our exploration capability and our ability to operate with the highest level of sustainability. Lithium is our core focus, underpinned by our interest in the world's best hard-rock lithium mine at Greenbushes. Copper and nickel remain on strategy but with a clear understanding of the market opportunities and challenges.



Our strategic themes include:



Exploration and Development:

To create a pipeline of projects that either progress to operations or divestment, enabling transformational growth.



Strategic and Technical Partnerships:

To enable IGO and our TLEA joint venture to act more quickly and with more confidence to capitalise on opportunities – organic and M&A – at different stages of the value chain and in different geographies.



Commercial Expertise:

Create market conditions where the products from our TLEA joint venture have appropriate market access and are appropriately valued.



The IGO Playbook:

The IGO Playbook will capture our DNA and will be a blueprint for successful replication of our way of operating. It will describe the interconnected way we work and create value, positioning us as a developer, operator and partner of choice.

2.3 Our Values

Our values help define who we are as an organisation and are key to our long-term success.



Be better together

We act safely and with care, to the strengths of our people. We empower, support and respect each other.



Ignite the spark

We seek, question, innovate and create. We know that without a burning curiosity and bright thinking, we risk missing the really big opportunities.



See beyond

We know that our actions today will impact the world of tomorrow. We believe our people, community and the environment really matter.



Run through the sprinklers

We find the fun in what we do. When our workplaces are healthier and happier, we are better.



Never stand still

We are bold, adventurous and excited for the future. We imagine new opportunities and seek new horizons.



3. Company Structure



IGO is an ASX listed company headquartered in South Perth, Western Australia with projects across Australia and overseas.

For the reporting period, IGO was the parent company for a number of Australian-based entities and one Canadian-based entity (refer to section 6 for more details).

IGO Newsearch Pty Ltd manages the majority of IGO's exploration activities, IGO Nova Pty Ltd operates the Nova Operation, IGO Forresteria Limited operates the Forresteria Operation, and IGO Cosmos Pty Ltd manages the Cosmos Project.

3.1 Operations

IGO is a producer of nickel and copper concentrate products, with a portfolio of operating, development and exploration assets located in Western Australia.

Our experience in the nickel sector spans over 20 years and IGO has an established reputation as a safe and reliable producer of metal products to local and global customers.

Our Nickel Business is focused on optimising and reviewing our existing operations, following softening nickel prices throughout the year. For FY24, IGO's nickel business comprised our, Nova Operation, Forrestania Operation as well as the Cosmos Project.

The Cosmos Nickel Project is located 30km north of Leinster in Western Australia, within one of Australia's top nickel regions. Following a comprehensive review of the Cosmos Project, IGO made the difficult decision in early 2024 to transition the Cosmos Project into care and maintenance.

The Forrestania Operation is located 400km east of Perth, Western Australia. It comprises of two underground mines, Flying Fox and Spotted Quoll, with ore processed at the onsite Cosmic Boy processing facility. Our Forrestania Operation entered care and maintenance during the September 2024 quarter.

The Nova Operation is an underground nickel-copper-cobalt mine and processing facility located east-northeast of Norseman in the Great Western Woodlands of Western Australia. Our focus continues to be safely optimising the extraction and processing of nickel at our Nova Operation.

Our Lithium Business is held via the Company's 49% equity interest in TLEA. TLEA, an incorporated joint venture with Tianqi Lithium Corporation (51%), owns and operates an integrated lithium business which includes a 51% interest in the Greenbushes Lithium Mine and 100% interest in the Kwinana Refinery, both of which are located in Western Australia. Greenbushes is operated by Talison Lithium under an incorporated joint venture between TLEA and Albemarle Corporation (TLEA: 51%/Albemarle: 49%). Greenbushes is a large-scale, long life, low cost, hard rock lithium mine located approximately 250km south of Perth, Western Australia. An established mining and processing operation, Greenbushes hosts the highest ore reserve grade of any hard rock lithium mine globally.

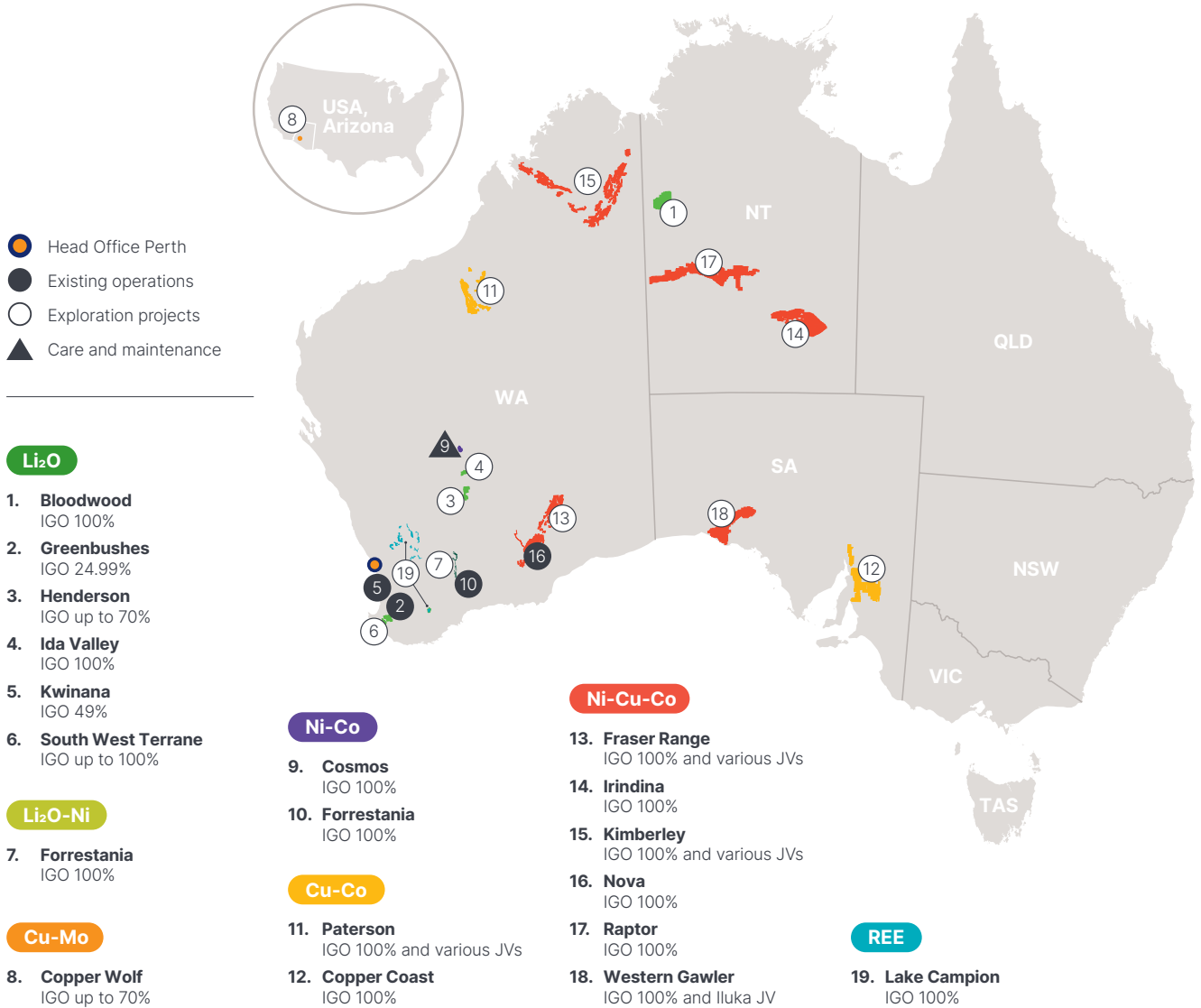
TLEA owns and operates the Kwinana Refinery, a fully automated, state of the art facility designed to produce lithium hydroxide for global customers. Located in the Kwinana Strategic Industrial Area, 35km south of Perth, the facility has been engineered to process spodumene concentrate sourced from Greenbushes, located 200km away. The modern slavery risks and actions taken associated with IGO's Lithium Business are not included in this statement.

IGO remains committed to unlocking value through exploration and discovery. IGO's exploration strategy is aligned to our broader corporate strategy focused on metals critical to clean energy. Our portfolio, targeting nickel, copper and lithium, comprises some 88,700km² under application or active tenement either 100% by IGO or in joint venture with various partners.



Key operations and projects

*Note that this map includes IGO's lithium interests held via our 49% interest in TLEA, an incorporated joint venture with Tianqi, which are reported on independently by TLEA.



Traditional Owner groups by project/region

Bloodwood

Warrpiri

Copper Coast

Barnjarla, Ngadjuri

Cosmos

Tjiwarli

East Kimberley

Jaru, Koongie-Elvire, Malarngowem, Miriuwung-Gajerrong, Ngarrawanji, Yi-Martuwarra Ngurrara, Yurriyangem Taam, Gooniyandi

Forrestania

Ballardong (South West Settlement), Marlinyu Ghoorlie

Fraser Range / Nova Operation

Ngadju, Untiri Pulka, Upurli Upurli Nguratja

Greenbushes

South West Boojarah (South West Settlement), Wagyl Kaip Southern Noongar (South West Settlement), Gnaala Karla Booja (South West Settlement)

Ida Valley

Darlot

Irindina

Arrernte People

Kwinana

Gnaala Karla Booja (South West Settlement)

Lake Campion

Ballardong (Noongar South West Settlement) and Marlinyu Ghoorlie

Paterson

Nyangumarta People, Martu, Ngurrara

Raptor

Warrpiri, Anmatyerre, Kaytetye

South Perth

Whadjuk (South West Settlement)

West Kimberley

Bunuba, Warrwa, Wanjinna Wunggurr Wilinggin, Dambimangari

Western Gawler

Mirning - Far West Coast, Wirangu - Far West Coast, Kokatha - Far West Coast, Yalata, Maralinga Tjaratja - Far West Coast

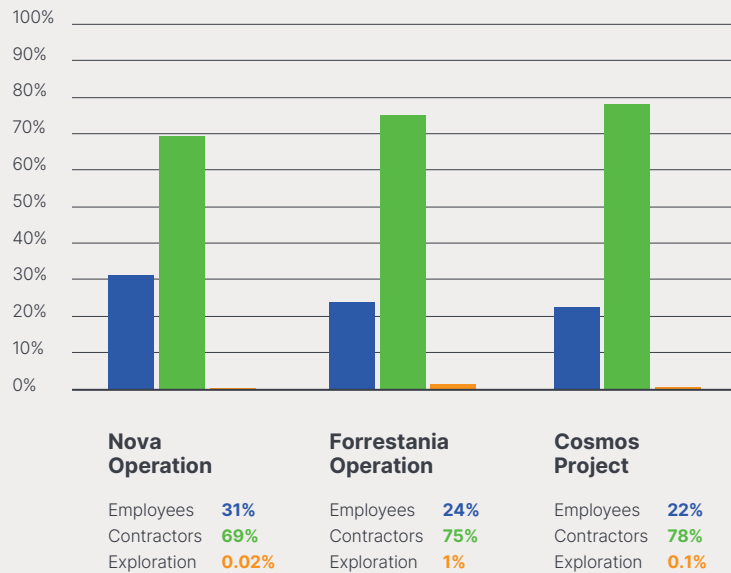
Employees

As at 30 June 2024, IGO employed 658 direct employees across our business. Our workforce is based at our Perth office, our regional exploration areas, and at our Nova Operation, Forrestania Operation and Cosmos Project, which predominantly operate as fly-in fly-out sites.

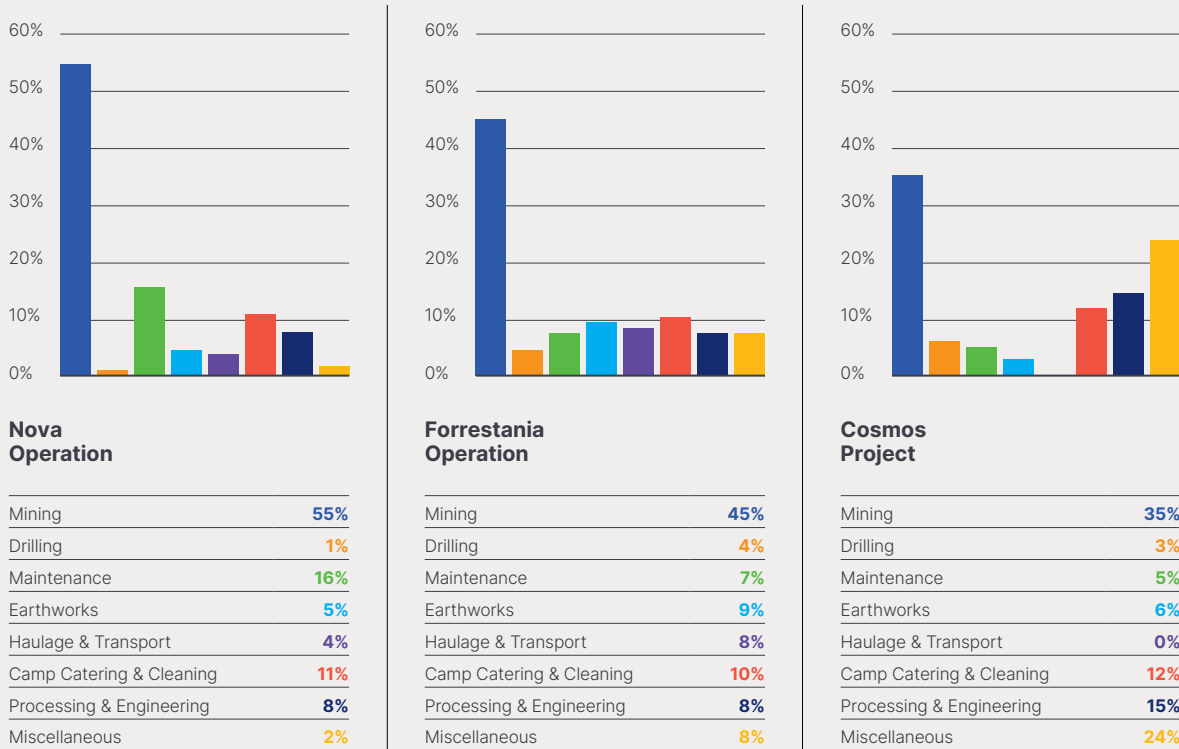
We have a large team working on our regional exploration projects primarily in Western Australia and the Northern Territory, with developing prospects in South Australia.

The personnel at our operations and projects include operational personnel, exploration personnel and contractors working at or near the site. Contractor personnel make up most of our personnel on site at any one time. The charts to the right and below provide an indicative proportion of personnel from our operations teams, exploration teams and various site contractors for FY24 across our mining operations, based on total hours worked.

Operations: Breakdown of personnel



Contractor categories



3.2 Supply Chains

Our supply chain partners are crucial to IGO's success.

Our approach to responsible sourcing is aligned to our purpose and strategy – ensuring the quality products we supply are made safely, ethically, sustainably and reliably. This extends further than our immediate operations and activities.

In line with our Code of Conduct and Human Rights Policy, we expect all suppliers to maintain the highest standard of ethical behaviour in business dealings. We seek to engage like-minded suppliers and business partners who are committed to, at a minimum, operating in a safe, lawful and competitive manner.

Tier 1 Suppliers are suppliers that IGO directly engages to provide goods and services to support our operations.

Tier 2 Suppliers are suppliers that are engaged by IGO's Tier 1 Suppliers to provide goods and services in support of IGO's operations.

A snapshot of our procurement spend for the FY24 period is set out below. The spend includes IGO Group entities and all figures are in Australian Dollars, exclusive of any applicable GST.

Snapshot of FY24 Procurement Spend

In FY24, IGO's Tier 1 Supplier spend was \$832m across Corporate, Exploration, our Operations (Nova and Forrestania) and Projects (Cosmos). We worked with over 1,500 Tier 1 Suppliers who primarily operate out of Australia. Some of our shipping providers are headquartered internationally.

IGO sources substantial goods and services to support the mining lifecycle throughout exploration, mining, production, processing and shipping. Our higher spend categories are listed in Table 1.

Table 1: Higher Spend Categories

Category	Total Spend (excl GST - A\$)	No. of Suppliers
Mining	\$299,951,643	40
Fuel and Power Supply	\$89,740,622	33
Professional Services, Rates and Miscellaneous Vendors	\$79,427,797	282
Civil Works and Site Ancillary	\$72,163,884	45
Haulage and Transport	\$59,337,009	46
Processing Services and Reagents	\$48,482,955	71
Maintenance Services Contracting	\$39,846,527	112
Camp Services	\$31,732,390	57
Drilling Services	\$22,519,541	15
Consumables	\$17,858,545	121
Labour Hire	\$16,505,567	54
Information Technology and Software	\$14,842,549	64
Geological Services	\$8,878,185	35
Shipping	\$4,730,812	12

* This table includes any supplier with a spend of >\$25,000 during the reporting period and may include duplicate suppliers across individual entities.



IGO values our relationships with local suppliers – from the suppliers local to our operations to our Western Australian and Australian suppliers.

FY24 Supplier Spend Relative to our Operations (Percentage)

	%
Local	3
Western Australia	82.6
Australia	13.7
International	0.7

FY24 Distribution of Payments to Suppliers (A\$ million)

	Local	Western Australia	Australia	International*	Total*
Suppliers of goods and services - Nova Operation	6.4	221.7	18.7	3.3	250.1
Suppliers of goods and services - Forrestania Operation	8.7	165.7	5.9	0.3	180.3
Suppliers of goods and services - Cosmos Project	3.8	250.7	67.1	1.1	322.7
Suppliers of goods and services - Exploration Activities (Newsearch)	4.3	17.5	4.0	0.7	25.9
Suppliers of goods and services - Corporate	1.6	31.9	18.1	1.6	53.2
Total	24.8	687.5	113.8	6.0	832.0

* All figures have been rounded to the nearest \$100,000. Totals may vary due to rounding.

4. Our Approach



Our approach to responsible sourcing is aligned to our purpose and strategy – ensuring the quality products we supply are made safely, ethically, sustainably and reliably.

IGO’s Code of Conduct sets expectations that all suppliers must maintain a high standard of ethical behaviour in business dealings.

IGO continues to work to identify and address modern slavery risks in our business. Since the first reporting period, we have completed several risk reviews of our operations and supply chains, continued to construct effective governance processes and worked through a comprehensive action plan.

In FY23, IGO worked on introducing and embedding our existing practices in new areas of our business. In FY24, we continued to maintain our existing modern slavery risk assessment and management practices in relevant areas of our business and utilise a modern slavery risk screening tool to improve our Initial Risk Assessment process.

We structure our approach and reporting into five key areas:

- Corporate Governance
- Risk Assessment and Due Diligence
- Remediation
- Training
- Collaboration

4.1 Corporate Governance

IGO has developed a strong framework to manage our modern slavery governance.

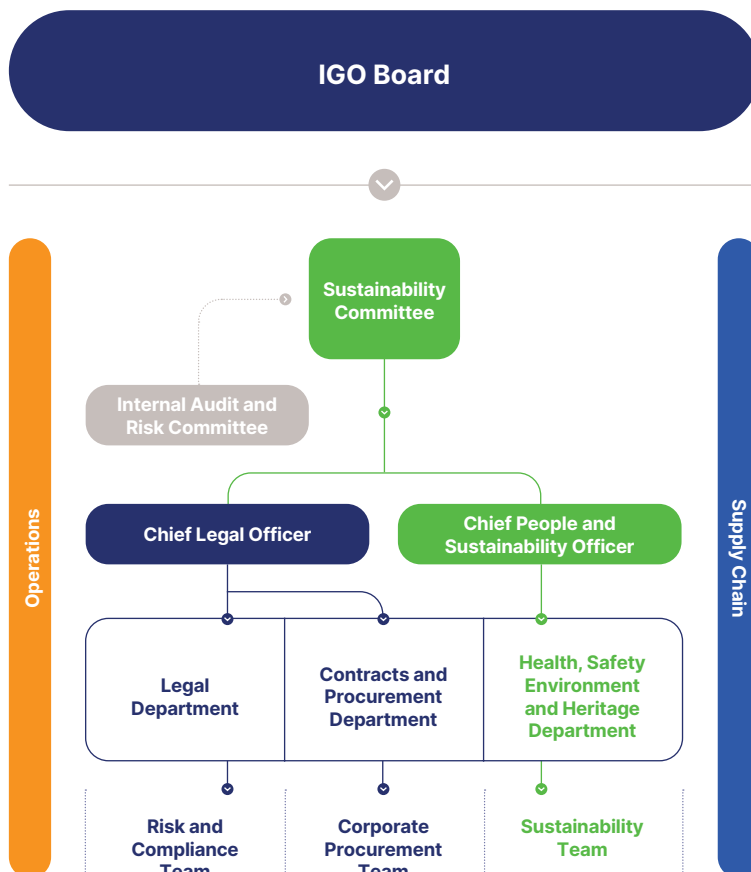
Our key documents include our Human Rights Policy, Code of Conduct and Speak Up Standard, available in the **Governance section** of our website. Our Board undertakes an annual review of our policies and standards.

Accountability

Our Board is accountable for overall guidance and decision making as well as overseeing the management of our impacts on the environment, society, economy and people. We are aware of the increasing focus on how companies conduct business, and we regularly review our practices, recognising where we can do better and taking ownership when things don't go right.

It is the collective responsibility of the Board and all levels of management to ensure we act ethically, sustainably and in accordance with the law. As outlined in the IGO Board Charter, the Board is responsible for ensuring that IGO has an appropriate risk management framework for sustainability-related risks; as well as for setting standards for sustainability, social and ethical practices that will build the desired corporate culture and enhance and protect IGO's reputation.

Our Sustainability Committee assists the Board in fulfilling its responsibilities by overseeing, monitoring, reviewing and reporting to the Board our practices and governance in our sustainability areas, including human rights. The Sustainability Committee is responsible for overseeing IGO's risk framework and management systems related to sustainability, as well as the identification, management and mitigation of sustainability-related risks and performance.



IGO's Board, through the Board-level Sustainability Committee, delegates responsibility for compliance with the Act and execution and implementation of IGO's modern slavery obligations to the Chief Legal Officer and Chief People and Sustainability Officer. In FY24, IGO's Chief Legal Officer maintained responsibility for assessment and due diligence relating to our broader operational risks.

The Chief Legal Officer assigns responsibility for modern slavery due diligence relating to IGO's supply chains to senior management in the Corporate Procurement team with support from the Risk and Compliance team and Sustainability team. The Corporate Procurement and Risk and Compliance teams work together to conduct supply chain risk assessments and governance activities.

For more detail about our wider governance and management standards, refer to our **website** and our **2024 Corporate Governance Statement**.



Human Rights Policy

IGO’s policies establish the overarching framework, approach and specific aims for how our business operates. Our Human Rights Policy includes modern slavery obligations and commits IGO to:

- Observe basic human rights recognised in the Universal Declaration of Human Rights
- Commit to a continuous improvement approach for modern slavery risk identification, risk management and supplier engagement
- Refuse to tolerate any form of modern slavery in our operations or supply chains
- Prohibit all forms of bribery and corruption and offer strong protection to individuals who report any breaches
- Recognise and respect Aboriginal and Torres Strait Islander cultural heritage and collaboratively work with Aboriginal and Torres Strait Islander communities affected by our operations; and
- Maintain a strategic focus on continuous learning and development to ensure our business practices are aligned with our obligations and values.

Code of Conduct

IGO promotes ethical and responsible decision-making by clearly stating our values and purpose in our Code of Conduct. Our purpose and values guide not only what we do, but how we do it. It applies to all our people, including Directors and contractors and provides information on how our people are expected to behave in the workplace and treat others. Our Code of Conduct is supported by a system of internal controls, our risk management process and our corporate governance framework to drive continuous improvement and promote responsible conduct.

There were no reported Code of Conduct breaches relating to modern slavery or human rights issues in FY24.

Speak Up Standard

Central to the way we do business is our commitment to encourage a culture where our people feel safe to speak up when our values and Code of Conduct are not being followed. We do not stand for any form of detrimental behaviour against someone reporting a business conduct concern.

At IGO, we want to ensure our people feel comfortable speaking up about safety and behavioural matters. To do this, we have several internal pathways for our people to raise workplace concerns, including speaking with their supervisor, manager or People and Culture representative, as well as reporting actual or suspected misconduct through the external Speak Up online disclosure platform.

This year we had four reports made through the Speak Up program related to unsafe workplace, unethical conduct, discrimination, harassment and bullying, conflicts of interest and sexual harassment. All reports were fully investigated and closed out with the implementation of any recommendations (including disciplinary action) prior to the end of the financial year.

There were no reports of modern slavery or human rights issues raised via the Speak Up service in FY24.

While the Speak Up platform remains open to all, we understand that speaking up may feel daunting in the first instance for some people. To provide those who would like an internal alternative, our Contact Officer program offers a network of trained employees entrusted to provide a safe and comfortable


environment to discuss workplace concerns relating to discrimination, harassment and bullying. In FY24 we expanded the group of Contact Officers, who support our workforce by maintaining our positive workplace culture and supporting our equal opportunity and anti-discrimination/ bullying policies and standards. IGO's Employee Assistance Program also provides confidential, flexible counselling services to help support the emotional, mental and general psychological wellbeing of our employees and their immediate family.


Speak Up Protection Officers

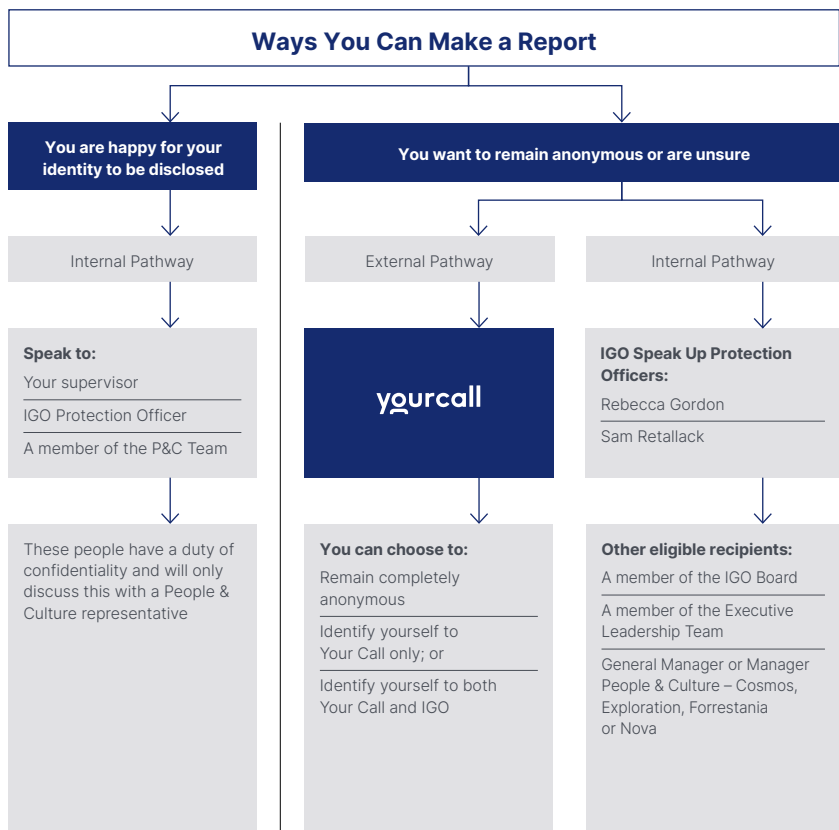
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Monday – Friday

 www.yourcall.com.au/report
Available 24/7
Use unique identifier code "IGO"



Our Actions and Progress

In FY23, IGO committed to the development of a separate Supplier Code of Conduct to reflect best practice guidance. A dedicated Supplier Code of Conduct clearly communicates our expectations to our suppliers, including in relation to modern slavery and human rights issues and associated reporting mechanisms. In FY24, we continued to work on developing our Supplier Code of Conduct but have yet to finalise and implement with our suppliers.

4.2 Risk Assessment and Due Diligence

The establishment of effective risk assessment and due diligence practices are fundamental to our ability to identify and address modern slavery. IGO has developed processes to manage the modern slavery risks in our operations and supply chains.

In FY24, key factors influencing global modern slavery risks included geopolitical conflicts, natural disasters and climate change, addressed in the operational risks and supply chain risks sections below.

Operational Risks

IGO's operations are primarily based in Australia. Table 2 provides a summary of the key operational risks in the global extractives industry.

Table 2: Key Operational Risks in the Extractives Industry

Risk	Description
Contracted and subcontracted labour	Decreased visibility / oversight of contracted and subcontracted labour increases the risk of modern slavery, particularly in the form of forced labour
Demand volatility	Resource demand volatility causes fluctuations in demand – affecting production, workforce size and working hours, as well as creating labour hire cost pressures
Business practices	Aggressive price negotiation, inaccurate forecasting, late orders, short lead times and last-minute changes to orders may cause pressure on contractors and subcontractors to meet demand and negatively impact working conditions
Instances of labour exploitation	Labour exploitation has occurred in the resources sector, particularly in jurisdictions with less stringent regulatory requirements to protect the rights of workers
Recruitment agencies	Recruitment agencies may charge workers, often migrant workers, recruitment or hiring fees, subjecting workers to modern slavery in the form of debt bondage
Chartering and contracting sea transport	Chartering and contracting sea transport is susceptible to the risks of modern slavery, with the inherent physical and geographical remoteness of shipping decreasing visibility of working conditions. The International Labour Organization (ILO) has highlighted that working conditions often associated with seafaring, such as isolation, restriction of movement, excessive overtime and abusive working and living conditions are also key indicators of forced labour

In Australian mining, modern slavery is generally more likely to be in the form of forced labour or debt bondage resulting from the use of contracted and subcontracted labour and third-party recruitment agencies. We consider that the overall risk of modern slavery in our operations is low, due to our operations being in Australia and subject to Australian legislation, but we recognise that higher risks may emerge in our operations through future expansions, acquisitions and investments.

IGO acknowledges the impact of global pandemics and geopolitical conflicts, natural disasters and climate change on increasing the prevalence and number of modern slavery victims. However, in FY24 we did not identify any specific or direct impact to the risk profile of our primarily Australian-based operations or prospects.

Our Actions and Progress

Business Acquisitions

IGO undertakes due diligence of our proposed business acquisition targets, which includes consideration of potential human rights issues and modern slavery risks. For example, we review a range of data sources to determine if there are any issues associated with a company’s past or current business practices that represent a risk of any form of modern slavery.

Employment Practices

Our people are fundamental to delivering our business strategy. IGO’s unique culture has a strong embedded purpose and values and is an important part of our business which sets us apart from our industry peers. Our people are our difference, and we continue to work together to inspire, empower and respect each other to ensure we achieve our purpose of Making a Difference.

Our employment practices ensure that our employees do not face exploitative treatment such as slavery, forced labour or servitude. We use the Walk Free Modern Slavery Benchmarking Tool to review our employee practices and protections.

For more information about IGO’s systems and processes, refer to our 2024 Sustainability Report and Code of Conduct available on our **website**.



**Walk Free Modern Slavery Benchmarking Tool:
Employment Practices**



Are workers paid a living wage?*	We pay competitive market salaries to secure talented employees. We undertake annual remuneration reviews for all employees that consider factors such as industry benchmarking and CPI.	✓
Are workers paid their wages and other benefits on time?	We pay all wages and benefits in accordance with periodic pay dates and standard accounting processes and procedures.	✓
Are workers required to work excessive overtime?	Our corporate employees generally work regular business hours with reasonable overtime on an as required basis. Our site and exploration employees work on fixed-length rosters and are subject to stringent fatigue management processes that prohibit excessive overtime. IGO recognises that employees have a diverse range of work, family and individual needs, and we support our people in meeting these by offering a flexible, work-from-anywhere approach where possible – including offering hybrid roles that balance a combination of site, office and home-based work.	✓
Do workers pay recruitment fees or other fees to get the job?	Employees never pay fees to gain employment with IGO. Our internal recruiters conduct all direct employee recruitment processes. We prohibit the use of recruitment fees for temporary labour arranged by third-party labour hire companies.	✓
Are workers in situations of debt bondage?	Employees are never charged accommodation or travel costs for their employment with IGO. We employ people local to our Corporate office. We arrange and provide all accommodation and transport for our site and exploration employees from their designated point of hire.	✓
Do workers have safe and sanitary working and living conditions?	We are committed to providing a safe and healthy place of work and safe systems of work. All employees must be fit for work. Our people and workplaces are subject to management controls such as our Safety & Wellbeing Policy, Mental Health & Wellbeing Strategy and Safety & Wellbeing Risks Standard. We provide fit for purpose accommodation facilities that are regularly cleaned for our site and exploration employees.	✓
Do workers have contracts in a language they understand?	Our employees are provided written contracts drafted in English.	✓
Do workers have access to passport / ID documents at all times?	We verify our employees' identities, but we never retain their original identity documents such as their passport or driver's licence.	✓
Are workers free to leave their employment or accommodation at all times?	With the exception of legitimate Health, Safety and Environment requirements, we do not restrict the movement of our employees at any of our worksites.	✓
Do we ensure workers' interests are adequately represented, including by respecting worker rights to join trade unions or workers associations?	In accordance with our Human Rights Policy, we uphold the fundamental human rights of all people we engage with in our business and observe the Universal Declaration of Human Rights, including the right of our employees to form and join trade unions.	✓
Are all workers' ages checked and child labour prevented?	We verify the identity of all our employees and prohibit child labour in our operations.	✓
Does discrimination occur in the workplace?	We do not tolerate bullying or any form of harassment including sexual harassment, discrimination, victimisation or intimidation of any kind or any other type of unwelcome behaviour. We have policies, procedures, training and support for our employees to prevent discriminatory practices in our workplace, for example: <ul style="list-style-type: none"> • Diversity and Equal Opportunity Standard • Discrimination, Harassment and Bullying Procedure • Grievance Resolution Standard • Speak Up Standard As a Work180 Endorsed Employer, IGO is recognised for our ongoing commitment to creating an equitable workplace. Training and awareness are essential to our DEI efforts, and we continue to provide tailored training courses to our employees. This year we continued our learning and development programs, which focus on creating and supporting a positive and fair culture within the workplace, including our Custodians of Culture learning series and our Respect in the Workplace course. We also require all new starters to review and confirm their understanding of core IGO policies and documents relating to DEI.	✓

*A living wage is remuneration sufficient to afford a decent standard of living for the worker and their family. Elements of a decent standard of living include food, water, housing, education, health care, transportation, clothing and other essential needs including provision for unexpected events.

Business Practices

IGO committed to undertake a review of our commercial practices and decision-making processes in FY23. We sought to understand if our practices and processes constrain our ability to undertake appropriate due diligence activities or negatively impact the working conditions or performance of our contractors.

As a part of this review, we updated our due diligence, standard agreements and supplier onboarding to ensure a consistent approach across the business. These processes take into consideration key areas of responsible purchasing, particularly with respect to the viability of suppliers, their ability to deliver to our requirements and the risks to both parties associated with delivery of goods and services.

IGO standards seek to promote a partnership with shared responsibility at its core. Key components in this approach include as standard:

- The ability of all parties to negotiate terms;
- Provisions for variations;
- Sustainable pricing; and
- Fair payment terms.

Our company has undergone substantial changes in this reporting period, and this has changed the composition of our business. We will continue to improve our commercial practices to better fit our current and future structure of our business, including our contractor management and risk management practices. We will continue our work to identify potential issues and then develop and implement any improvements necessary to reduce these impacts.

Supply Chain Risks

IGO's Supplier Risk Assessment and Management Process is set out below. Since conducting a baseline risk assessment of all existing suppliers in FY21, we now conduct an Initial Risk Assessment prior to onboarding any new supplier. Our Initial Risk Assessment methodology is set out on page 22.

The Initial Risk Assessment identifies the specific form of modern slavery, in particular forced labour, and reflects an overall assessment of inherent modern slavery risk. We request any high-risk suppliers to complete a Modern Slavery Self-Assessment Questionnaire (SAQ) to obtain more specific information about the supplier and help determine the specific form(s) of modern slavery potentially present in their operations and supply chains.

IGO's Tier 1 suppliers are based in Australia apart from our shipping partners (see section 3.2 for more information). IGO acknowledges the impact of global geopolitical conflicts, natural disasters and climate change on increasing the prevalence and number of modern slavery victims.

We did not identify any specific or direct impact to the risk profile of our primarily Australian-based supply chains and our purchasing practices remained consistent.

Contracting Arrangements

Our procurement contracts include standard terms and conditions that require our suppliers to take reasonable steps to identify, assess and address modern slavery risks and notify us of any modern slavery practices in their operations or supply chains. We address rectification conditions, and we are permitted to undertake supplier verification activities. We require our suppliers to place similar obligations on their own suppliers.

Our contracting templates include a right for us to terminate the contract if a supplier fails to adequately manage or take reasonable action to address modern slavery issues.

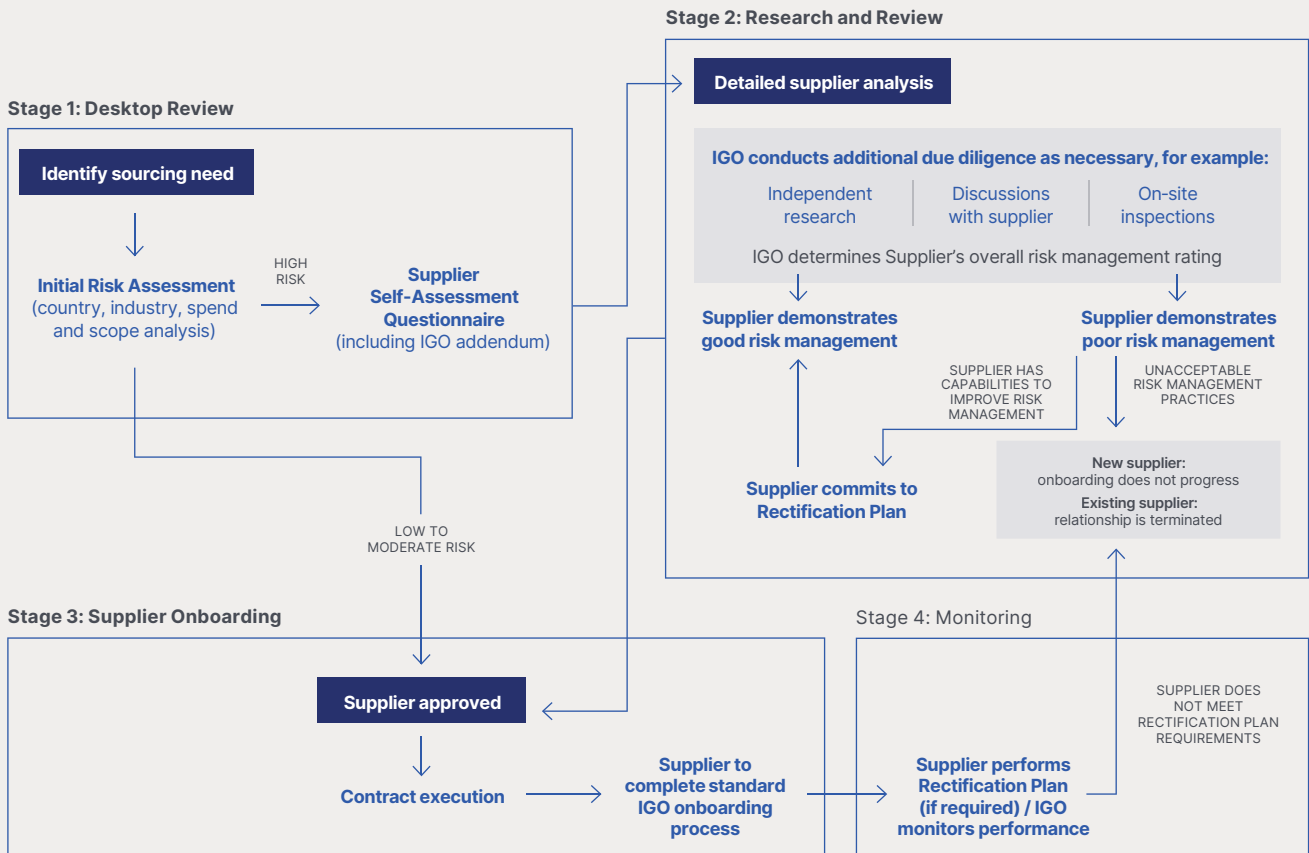
Grinding Media Supplier Review

This year we undertook a review of our grinding media suppliers in response to the identification of heightened supply chain risks associated with the procurement of scrap metals and overseas manufacturing.

This involved a detailed review of the human rights and modern slavery processes and mitigations of shortlisted suppliers. As a result of our review, we identified a supplier with long-term leading SA8000 Standard certification, as well as strong internal policies and evidence of workforce and supplier audits.

This outcome demonstrates the value of undertaking due diligence reviews, as we seek to reduce adverse social, human rights and modern slavery risks in our supply chain.

Supplier Risk Assessment and Management Process



Initial Risk Assessment: Methodology

For our Initial Risk Assessment, we use dedicated software to conduct a desktop review of each supplier based upon an analysis of country and industry risks. The overall inherent modern slavery risk rating for each Tier 1 Supplier is calculated utilising these key elements as well as the total projected spend. If the projected spend is low, it may be considered as a mitigating factor.

Our Actions and Progress

Supplier Risk Assessments

In FY22, IGO reviewed the data sources we utilised to conduct the Initial Risk Assessment and determined that we required more dynamic data sources. We engaged with specialist providers working in this sector and conducted a comprehensive review of available software options that could deliver an effective screening tool for our Initial Risk Assessment process. We selected a preferred supplier and finalised commercial negotiations.

In FY23, we implemented a new risk assessment screening tool to provide more detailed insights into our supply chain risks and help us better understand any potential adverse impacts for which we are responsible.

We conducted a new baseline Initial Risk Assessment of all our existing suppliers up to the end of FY22, including suppliers we inherited as part of our business expansion in June 2022.

None of our suppliers were identified as high risk, whereas we previously reported less than 2% of our combined existing, new and prospective suppliers were identified as high risk across FY21 and FY22.

In FY24, IGO completed 254 new supplier Initial Risk Assessments and again found that none of our new suppliers were identified as high risk.

IGO retains completed supplier SAQs and detailed supplier analysis. We perform ongoing analysis of the Initial Risk Assessment findings, endeavouring to achieve effective processes and produce meaningful outcomes.

IGO continues to engage and collaborate with our suppliers about specific issues that arise from our risk assessment and due diligence processes, particularly in sectors that we identify as higher risk.



4.3 Remediation

Once an adverse impact is identified, remediation is the crucial final step to address the modern slavery risk.

Our Actions and Progress

Since our first reporting period in FY20, IGO has not yet identified that we have caused or contributed to any instances of modern slavery. To date, we have not been directly linked to any adverse impacts. We do not have any Supplier Rectification Plans in place.

Our Speak Up Standard contains a step-by-step guide to our grievance investigation and resolution process and is publicly available on our website.

However, no modern slavery or human rights issues have been raised via our grievance resolution process.

We continue to focus on the prevention and mitigation of potential adverse impacts through activities such as desktop reviews and due diligence supported by strong commercial terms.

In FY23, IGO undertook a review of the Walk Free and Human Rights Resource and Energy Collaborative (HRREC)

Modern Slavery Response and Remedy Framework along with other best practice guidance. We will utilise these materials as we continue to formulate our own remediation framework around our existing risk management and governance processes.

No further action was undertaken in FY24.

4.4 Training

In accordance with IGO’s Human Rights Policy, we focus on continued learning and development for all employees to ensure our business practices are consistent with our values to promote and uphold the rights and dignity of all people.

Building awareness across our business about modern slavery and its potential prevalence in our operations and supply chains is a critical first step to eradicate it.

Our Actions and Progress

We consider different forms of training to meet the needs of our business, including modern slavery awareness training and professional development activities.

Modern Slavery Awareness Training for Employees

We have an ongoing commitment to deliver targeted, risk-based training for employees within our business. Consistent with our general approach to modern slavery, we are committed to continually review and revise our training content to ensure that it remains relevant to our business and reflects the changing nature of global modern slavery risks such.

At a minimum, our internal training package includes:

- definitions and forms of modern slavery
- examples of how modern slavery may arise in our operations and supply chains
- a summary of the Modern Slavery Act 2018 (Cth)
- IGO’s obligations under the Act, our actions and our future commitments
- obligations of employees in our business; and
- mechanisms for employees to raise any queries or concerns (e.g. via the IGO Speak Up Service – see section 4.1)

In FY23, we targeted new personnel in our Corporate Procurement Team and delivered training to 100% of targeted personnel. To help us evaluate the effectiveness of our employee training module, we measured whether it improved participants’ awareness and

understanding of modern slavery risks. All participants reported that the training module improved their understanding of modern slavery. However, overall limited training was provided in FY23.

In FY24, we planned to incorporate our modern slavery training into our broader risk and compliance training. We were unable to achieve this in FY24 due to significant change in the business, particularly the corporate structure.

We will continue to work on our longer-term modern slavery training strategy.

Professional Development

IGO provides ongoing learning and development opportunities for people to grow their career and thrive. These opportunities also help us to understand and assess the quality of our performance, actions and decisions against our peers and the global community assists our modern slavery risk management to reflect best practice.

Our team undertakes both formal and informal professional development activities including:

- participation in industry collaboration opportunities; and
- attendance at webinars, conferences and summits.

Supplier Engagement

IGO continues to work with our suppliers to address modern slavery issues. Whilst we do not currently deliver any formal supplier training, we share expertise and engage with our suppliers about key issues and actions.

4.5 Collaboration

Modern slavery is a complex issue that traverses many aspects of society.

Attempts to tackle modern slavery must consider affected individuals as well as the impact of governments, industry peers and civil society groups. Collaboration promotes collective, targeted action leading to more effective outcomes in combatting modern slavery.



Our Actions and Progress

IGO continually explores a broad range of collaboration and partnership opportunities that would help us better understand modern slavery and our own risks.

Internal

We committed to pilot an internal, cross-functional modern slavery working group in FY23 to drive engagement across our business.

Due to the increasing complexity of compliance and governance activities in our business, we determined that a standalone committee was not the most efficient use of internal resources. In FY24, we attempted to incorporate modern slavery considerations into an existing committee with limited success. In FY25, we will further review the most efficient and effective manner for achieving cross functional collaboration and report back on progress in the FY25 Modern Slavery Statement.

Industry

The Human Rights Resource and Energy Collaborative (HRREC) brings together leading companies from across the resource and energy industries to work collaboratively in identifying and addressing human rights and modern slavery issues in our sector. HRREC facilitates development and sharing of expertise between practitioners and provides a platform for engagement between industry, non-government organisations and other experts in modern slavery.

IGO joined HRREC in November 2021 and has been an active participant, particularly in the supplier and marine shipping sub-groups. The supplier sub-group is focused on human rights and related due diligence activities in supply chains. The marine shipping sub-group is addressing seafarer welfare issues.

Through our HRREC participation we have contributed to the ongoing development of industry-standard approaches and guidance to modern slavery issues.

IGO is also a member of the United Nations Global Compact (UNGC), which allows access to Global Compact Network Australia business and human rights events.



Human Rights Resource and Energy Collaborative

5. Evaluating the Effectiveness of our Actions



IGO's modern slavery work is designed to address any adverse impacts to people resulting from our operations and supply chains. To ensure that we address adverse impacts and modern slavery risks appropriately, we must evaluate the effectiveness of our actions.

5.1 Our Actions and Progress

IGO adopts a continuous review and improvement approach to our management of modern slavery risks, and this extends to how we evaluate the effectiveness of our actions.

In accordance with best practice guidance including the UN Guiding Principles for Business and Human Rights, IGO has developed a suite of quantitative and qualitative measures with a view to assessing the effectiveness of our actions to address modern slavery risks. Detail is provided in Table 3. These measures draw on feedback from both internal and external sources. These outputs and outcomes can be used to verify corporate governance, risk assessment and due diligence, remediation, training and collaboration initiatives. We use these measures to help us identify any areas for improvement.

Over the last 12 months, IGO has been actively working to improve its risk management capabilities and has continued to enhance and embed the risk management framework across our operations, projects and corporate

functions. This year, IGO collaborated with a local Western Australian provider, CGR, to implement a centralised Governance Risk and Compliance System for the management of all risk and compliance information across the Company, named 'IGO Guardian'. IGO Guardian's risk management module captures all risk management information, as well as a schedule of upcoming risk reviews. The implementation of IGO Guardian has also supported a significantly improved ability to understand common or systemic risk themes, improving our capability to manage them.

IGO incorporates the feedback we receive directly from our internal stakeholders (including employees) and external stakeholders (such as our investors) into our governance and risk management processes.

IGO strives to follow best practice in our corporate governance and sustainability practices and regularly engages with key shareholders and proxy advisors on these matters. Each year as part of our stakeholder engagement process, our Chair and key management representatives conduct an ESG Roadshow to engage with key shareholders and proxy advisors. The ESG Roadshow aims to discuss the Company's performance across environment, social and governance matters over the last 12 months, seek feedback and address any concerns.

As noted in section 4.1, no modern slavery or human rights issues have been raised via our Speak Up service, but it operates as a strong mechanism for us to obtain anonymous and targeted feedback about the effectiveness of our actions.

Table 3: Quantitative and Qualitative Measures

Key Area	Quantitative Measures (Outputs)	Qualitative Measures (Outcomes)
Corporate Governance	External benchmarking and rating of our modern slavery statements	Alignment of governance documents with best practice guidance
Risk Assessment and Due Diligence	Operational Risks	Improved understanding of risk profile and nature of risks
	Findings of annual employee engagement survey (%)	Quality of information obtained via due diligence and audits
	Supply Chain Risks	Potential or actual instances of modern slavery identified
	Number of new and existing suppliers screened (%)	Public reports or other findings of potential or actual instances of modern slavery not identified via risk assessment or due diligence processes
	Number of high risk suppliers (%)	
	Number of SAQs issued	
Remediation	Supplier SAQ completion rate (%)	
	Number of audits completed	
	Number of grievances relating to modern slavery or human rights issues	Quality of grievance resolution responses and adherence to internal process
	Number of active and resolved Supplier Rectification Plans	Improvements achieved via Supplier Rectification Plans
Training	Number of training hours delivered	Improved level of awareness and understanding of modern slavery and associated risks
	Training completion rate for targeted employees (%)	Improved ability to manage risks
	Training completion rate for total workforce (%)	Ongoing professional development
Collaboration	Number of HRREC meetings attended and hosted	Progress towards targeted HRREC deliverables
	Number of external collaborations achieved	Business engagement with internal collaboration attempts Feedback from external stakeholders

6. Consultation Process



IGO's Board is the governing body for IGO Limited. All IGO subsidiaries are supported by centralised shared services including our Legal, Finance, Corporate Procurement and IT teams.

All IGO Group entities are governed by the same risk management framework and governance practices. To prepare our modern slavery statement, the process of consultation involves our Board, our executives and relevant personnel and departments embedded throughout our business.

The IGO Group includes:

- IGO Limited (ACN 092 786 304)
- Flinders Prospecting Pty Ltd (ACN 146 899 863)
- IGO Newsearch Pty Ltd (ACN 142 192 701)
- IGO Stockman Parent Pty Ltd (ACN 124 695 549)
- IGO Stockman Project Pty Ltd (ACN 124 695 567)
- IGO Nickel Holdings Pty Ltd (ACN 167 644 519)
- IGO Nova Holdings Pty Ltd (ACN 009 150 083)
- IGO Nova Pty Ltd (ACN 146 091 527)
- IGO Windward Pty Ltd (ACN 158 432 270)
- IGO Lithium Holdings Pty Ltd (ACN 633 371 249)
- IGO Canada Holdings B.C. Ltd (FBN 722556701BC001)
- IGO Copper Holdings Pty Ltd (ACN 657 572 793)
- IGO Copper Pty Ltd (ACN 657 573 398)
- IGO Forresteria Limited (ACN 091 049 357)
- IGO Cosmos Pty Ltd (ACN 111 599 323)
- BioHeap Ltd (ACN 009 225 398)
- Western Areas Nickel Pty Ltd (ACN 122 522 696)
- Western Platinum NL (ACN 097 742 580)
- IGO Better Futures Pty Ltd (ACN 662 648 277)
- IGO Downstream Pty Ltd (ACN 664 474 864)

7. Approval

This statement was prepared in consultation with key personnel from each entity within the IGO group and approved by IGO's Board of Directors on 12 December 2024.



Michael Nossal

Chair
IGO Limited

