



# Modern Slavery Statement

This Modern Slavery Statement for the Roy Hill Group is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) for the financial year 1 July 2022 – 30 June 2023 (Statement).

# Modern Slavery Statement

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## From the CEO

As the CEO of Roy Hill, I am proud to lead an organisation that is dedicated to upholding the highest standards for our employees, suppliers, and the entire Roy Hill community. We firmly believe in conducting our business ethically and fostering strong relationships with our suppliers based on mutual trust and respect.

Modern Slavery is a grave issue that demands collective action to be eradicated. Roy Hill is determined to take an active role in combating modern slavery and ensuring we have a robust framework in place to identify and address any instances within our supply chain and operations.



In FY23, our focus was on developing a comprehensive roadmap for future initiatives and working closely with suppliers to enhance our efforts against modern slavery. We have successfully implemented our fourth annual plan for addressing these issues, which involved collaborating with external consultants and industry professionals, as well as implementing a new portal for managing and monitoring our efforts in this space.

We are committed to ensuring continuous improvement in this area and place a strong emphasis on collaborating with our suppliers and the broader industry to play our part in driving change.

It is with great pride that I present our fourth annual statement detailing our efforts to combat modern slavery. We welcome any feedback and remain dedicated to making a positive impact in this critical area.

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

Gerhard Veldsman  
CEO Roy Hill

Date 21 December 2023

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## 1. Identify the reporting entity

This statement addresses the risk of slavery and human trafficking in the business and supply chains of Roy Hill Holdings Pty Ltd, pursuant to the Modern Slavery Act 2018 (Cth) (the Act) for the reporting period 1 July 2022 to 30 June 2023. Roy Hill Holdings Pty Ltd ACN 123 721 077 (ABN 71 123 721 077) is a reporting entity as defined in the Modern Slavery Act 2018 (Cth).

This statement is made on behalf of all companies forming the Roy Hill Group.

In this statement, any reference to Roy Hill or the Roy Hill Group means Roy Hill Holdings Pty Ltd and its six wholly owned subsidiaries, Roy Hill Iron Ore Pty Ltd ACN 123 722 038 (ABN 18 123 722 038), Roy Hill Infrastructure Pty Ltd ACN 130 249 633 (ABN 60 130 249 633), Roy Hill Operations Pty Ltd ACN 168 771 355 (ABN 77 168 771 355), Roy Hill Logistics Pty Ltd ACN 627 019 489 (ABN 61 627 019 489), Rinehart Developments Pty Ltd ACN 654 973 583 (ABN 97 654 973 583) and HanRoy Iron Ore Projects (ABN 56 661 341 975).

Roy Hill's **Modern Slavery Policy** states that Roy Hill opposes the use of Modern Slavery practices and is committed to addressing the risk of modern slavery occurring in its operations or supply chains. Roy Hill also expects its suppliers and contractors to adhere to the same high standards in their own operations and supply chains.

Roy Hill's internal **Modern Slavery Specification** provides the framework for addressing modern slavery risks in its operations and supply chains. The Specification sets out:

- accountabilities
- the approach to operations and supply chain risk assessment and due diligence
- on-boarding and contracting requirements
- the auditing and compliance approach
- training proposals
- confidential internal reporting and annual external modern slavery reporting
- the approach to remediation of any issues arising.

The above documents will be reviewed and updated annually to reflect Roy Hill's ambition and approach to addressing modern slavery risk in the business.



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## 2. Structure, Operations and Supply Chains

### 2.1 Structure

Each member of the Roy Hill Group is a proprietary limited company.

Roy Hill Iron Ore Pty Ltd, Roy Hill Infrastructure Pty Ltd and Roy Hill Operations Pty Ltd are each 100% owned by Roy Hill Holdings Pty Ltd.

Roy Hill Holdings Pty Ltd is 70% owned by Hanrine Holdings Pty Ltd (being a wholly owned subsidiary of Hancock Prospecting Pty Ltd), 20% owned by KJTC Pty Ltd and 10% owned by POSCO. Roy Hill Holdings Pty Ltd has six wholly owned subsidiaries, as described above.

Roy Hill's corporate structure is made up of the Roy Hill board of directors, the Executive Team and its operational areas (mine, port, rail and corporate). Roy Hill's remote operations centre, corporate headquarters and supply buildings are located at Perth Airport, West Australia. Its registered office is HPPL House, Level 3, 28-42 Ventnor Avenue, West Perth, WA 6005. Roy Hill has a representative office located in Shanghai, which conducts market research and liaises with Chinese steel mills on behalf of Roy Hill.

As of 30 June 2023, the Roy Hill Group employed over 3400 employees across its site operations, Port Hedland and support in Perth; embedded contractors accounted for approximately 200 positions.

### 2.2 Operations

The companies forming the Roy Hill Group together own and operate an integrated iron ore mining, port, and rail operation in the Pilbara region of West Australia.

Roy Hill currently produces and exports approximately 60million tonnes (Mtpa) of iron ore per annum to international markets, with approvals in place to increase shipments to 70 Mtpa.

Roy Hill's mine is located approximately 115km north of Newman and incorporates conventional open pit, bulk mining operations with a 60Mtpa wet processing facility. Processed ore is sent 344 kilometres on Roy Hill's heavy haul rail line to a purpose-built two-berth port facility at Port Hedland where it is shipped to key markets including Japan, Korea, China and Taiwan. Roy Hill has a representative office in Shanghai and in FY23 approx. 63% of Roy Hill's production was sold to customers in China. As part of Roy Hill's ownership agreement, equity partners, Marubeni, POSCO and China Steel Corporation purchase just under half at the current full production rate of 60Mtpa.

Roy Hill has invested significantly in the comfort and lifestyle of its fly-in fly-out workforce with high quality accommodation camps at its mine as well as at its port and rail facilities in Port Hedland. Amenities include a wide variety of food options, mixed and women's only gymnasiums, a large multi-lane swimming pool, a variety of sporting facilities and free Wi-Fi.

Roy Hill has numerous physical and mental wellbeing initiatives in place, including a free Employee Assistance Provider and a Chaplaincy program which is available to all its employees, contractors and their families. Further, it provides an even-time rosters for its FIFO staff.

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## 2.3 Supply Chain

Roy Hill sources products and services from Australia and internationally. During FY23 we engaged with 1266 direct suppliers in 22 countries, with 83.92% of spend occurring with suppliers located in Australia.

For local operations in the Pilbara, Roy Hill gives priority consideration to Kariyarra, Palyku and Nyiyaparli owned businesses for contracting opportunities. Roy Hill works with Native Title Parties to develop employment, training and business opportunities for local communities. The table below outlines Roy Hill's spend by country for the FY23 period:

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Country	% Net Value
Australia	83.92%
Singapore	10.72%
Germany	3.62%
British Virgin Islands	0.55%
Switzerland	0.24%
Hong Kong	0.21%
Malta	0.16%
Belgium	0.14%
China	0.11%
Netherlands	0.11%

Roy Hill also has suppliers in USA, United Kingdom, Taiwan, Sweden, South Korea, South Africa, New Zealand, Japan, Israel, Ireland, Canada, Belgium and Austria, however, the net value of spend for suppliers in each is less than 0.1%.

Roy Hill's supply chain covers a broad range of goods and services including:

1. Construction materials;
2. Heavy Mining Equipment and Vehicles;
3. Consumables and parts;
4. Rotable Spares;
5. Fuel;
6. Freight & Shipping;
7. Equipment Hire;
8. Spare Parts;
9. Clothing;
10. Labour recruitment services;
11. Business services;
12. Office products and furniture;

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- 13. Health products and PPE; and
- 14. Agricultural goods and services

Roy Hill's top spend categories in FY23 were Operations and Maintenance, Shipping, Plant & Equipment Spares, Fuel and Corporate Services

Roy Hill's Procurement team is responsible for purchasing goods and services for the operational requirements of the business.

Roy Hill expects its suppliers and contractors to adhere to our high standards in their own operations, including ensuring they are not, in any way, involved in modern slavery. Roy Hill's Modern Slavery Procedure provides a framework to ensure appropriate levels of Supplier engagement in relation to mitigating modern slavery risks. Roy Hill will continue to work closely with its Supplier's to ensure it delivers on its commitments both within the Roy Hill operation and its supply chain.



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## 3. Describe risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities the reporting entity owns or controls

Roy Hill recognises that modern slavery is a breach of a person's fundamental right to live freely. Walk Free foundation has highlighted that the problem is getting worse, with the most recent figures showing an estimated increase of 10 million additional instances globally since the previous estimates were released in 2017. Modern slavery includes eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. Roy Hill acknowledges that modern slavery sits at the most serious end of a spectrum of exploitative labour practices and human rights abuses.

Roy Hill is not aware of any modern slavery in its operations or supply chains, however, is cognisant of the potential for increased risk resulting from the COVID-19 pandemic and the conflicts developing globally. Roy Hill recognises the inherent risk of modern slavery in global supply chains of which it is a part and is committed to working with suppliers to address modern slavery risks.

### 3.1 Modern Slavery risks in operations

Roy Hill's operations are located in West Australia and our employees include engineers, geologists, technicians, operators and drivers, accountants, administrators, lawyers, heritage specialists, environmental scientists, electricians, shipping and marketing specialists and other professionals. Employees are paid in accordance with Roy Hill's remuneration and recruitment policies and at rates significantly above applicable Award rates.

Roy Hill's workforce is approximately 75% fly in fly out (FIFO). Roy Hill understands the challenges that face FIFO workers and works hard to support its FIFO workers so that they can thrive. Not only does Roy Hill provide high quality accommodation services at its mine site and its port, but it also invests time in supporting its staff to make smart health, social and safety choices. Roy Hill has policies related to well-being, training and diversity and inclusion, which enable employees to thrive. These policies and protections, combined with Australia's low ranking in the Global Slavery Index, mean that Roy Hill considers that the risk of modern slavery occurring in its operations to be low.

Finally, Roy Hill acknowledges that as part of the mining and explorations industry, there may be broader human rights impacts in its operations, despite policies and protections to mitigate risk. These activities can impact rights related to workplace health and safety, labour, Indigenous peoples, water and sanitation and the rights of community members who live near its operations. Roy Hill acknowledges that it needs social license to operate, and actively supports the local community, particularly the Traditional Owners affected by its operations.

### 3.2 Modern Slavery risks in supply chain

Roy Hill's supply chain is broad, complex and of a global nature. Roy Hill has identified that it acquires goods and services from higher risk industries, such as garments, PPE, electronics, construction and shipping. Roy Hill also has suppliers located in higher risk countries, as identified by the Global



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Slavery Index. Roy Hill has developed methods to assist in identifying such risks during various stages of the procurement cycle and it has not yet discovered any instances of modern slavery.

Approximately 5.5% of Roy Hill's on-site workforce are embedded contractors, with some additional contractors from time to time. Roy Hill acknowledges that hiring externally could increase the company's exposure to poor labour practices and modern slavery. However, Roy Hill prefers to directly employ its workforce rather than rely on labour hire contractors, which provides Roy Hill with full visibility over their working conditions and terms. For the remaining labour hire contractor workforce, Roy Hill manages modern slavery risk through the terms of the labour hire agreements.



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## 4. Actions taken

### 4.1 Actions taken in the reporting period

In this fourth year of reporting, Roy Hill's actions focused on developing a comprehensive modern slavery roadmap, conducting in depth supplier reviews where potential risks exist, and collaborating with third parties and industry experts to strengthen our modern slavery response framework.

#### 4.1.1 Modern Slavery Roadmap

During this reporting period, Roy Hill developed a comprehensive modern slavery roadmap, outlining the strategic steps and initiatives to be undertaken in the coming years to address and mitigate modern slavery risks in our operations and supply chains. The roadmap will be reviewed and updated annually to ensure continuous improvement and alignment with industry best practices.

#### 4.1.2 Modern Slavery Working Group and Steer Committee

Recognising the importance of a collaborative and cross-functional approach to addressing modern slavery, Roy Hill expanded the participants of the Modern Slavery Working Group and established a Steering Committee during this reporting period. The Working Group comprises representatives from various departments within the organisation, including Commercial, Legal, Risk and Human Resources ensuring a diverse range of perspectives and expertise. The Steering Committee, consisting of senior leaders from key business units, provides direction and oversight to the Working Group.

Together, these groups are responsible for developing, implementing, and monitoring Roy Hill's modern slavery initiatives, as well as fostering a culture of awareness and commitment to combating modern slavery throughout the organisation. By leveraging the collective knowledge and experience of the Working Group and Steering Committee, Roy Hill aims to drive continuous improvement in our modern slavery response framework and enhance our ability to identify and address potential risks in our operations and supply chains.

#### 4.1.3 Modern Slavery Portal

Roy Hill engaged in discussions with several suppliers and industry peers to identify and select a modern slavery portal that best aligns with our needs and objectives. The chosen portal offers a centralised platform for managing and monitoring our modern slavery initiatives, streamlining supplier assessments, and facilitating collaboration with external stakeholders. The implementation of this portal will enhance our ability to track progress, identify trends, and share best practices, ultimately strengthening our overall modern slavery response framework. Moving forward, Roy Hill will leverage this portal to drive improvements and foster greater transparency in our efforts to combat modern slavery in our operations and supply chains.

#### 4.1.4 Conducting In Depth Supplier Reviews

Roy Hill conducted in depth supplier reviews in cases where potential modern slavery risks were identified. These reviews involved thorough assessments of supplier practices, policies, and procedures related to modern slavery. The findings and recommendations from the reviews were

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presented to the Modern Slavery Working Group and endorsed by the Steering Committee as required. The reviews were insightful and further developed our teams understanding of the challenges in this space, particularly with suppliers who are based in non-English speaking countries.

## 4.1.5 Collaboration

Roy Hill actively engaged with third parties and industry experts to enhance our understanding of emerging modern slavery risks and share best practices for addressing these risks. Collaborative efforts included participation in industry forums, roundtable discussions, and working groups, as well as partnering with external consultants to develop our modern slavery roadmap.

## 4.2 Planned actions

Roy Hill has planned the following activities to further embed modern slavery risk prevention:

Goal	Target Metric
<b>Complete required updates to suite of Modern Slavery documents in line with Roy Hill's recent process improvements.</b>	All documents updated, approved and published
<b>Conduct a modern slavery risk hot spotting exercise to identify Roy Hill's most salient Modern Slavery risks</b>	Risk hot spotting exercise
<b>Imbed Modern Slavery Portal into business processes</b>	Modern Slavery Portal is utilised and incorporated into relevant written processes
<b>Roll out Modern Slavery training to those in roles which may interface with the issue of Modern Slavery</b>	Relevant key functions receive basic awareness training.
<b>Further expand Roy Hill's networks in relation to Modern Slavery to enable further collaboration</b>	Participation in forums new to Roy Hill.
<b>Strengthen the accessibility, inclusivity and communication of Roy Hill's modern slavery grievance reporting channels</b>	Relevant documents updated and communication delivered to business.
<b>Conduct in depth investigation into high-risk areas/products within Roy Hill's supply chain</b>	Minimum of 2 high risk areas/products investigated



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## 5. Assess effectiveness

Roy Hill reviews the effectiveness of its modern slavery risk management process on an annual basis. Below is a table tracking progress against commitments made in Roy Hill's third Modern Slavery Statement:

Activity	Status
<b>Review suite of Modern Slavery documents to reflect Roy Hill's current priority and ambition</b>	Comprehensive review undertaken and required amendments to documents identified.
<b>Undertake maturity assessment to understand areas for improvement</b>	Review conducted by external third party and roadmap developed
<b>Expand membership of Modern Slavery Working Group and define responsibilities/ establish routines</b>	Working Group expanded to include Human Resources and Legal stakeholders
<b>Expand Modern Slavery training program</b>	Further training to commercial teams delivered, with wider awareness program to be rolled out to the business in future years in accordance with the modern slavery roadmap.
<b>Strengthen Roy Hill's current supplier risk assessment process</b>	Process for in depth supplier reviews devised and implemented.
<b>Expand Roy Hill's networks in relation to Modern Slavery to enable further collaboration</b>	Collaboration with external parties continued.
<b>Further develop modern slavery risk reporting channels</b>	Modern Slavery risks are now incorporated in the business risk review meetings with regular cadence.
<b>Conduct in depth investigation into high-risk areas/products within Roy Hill's supply chain</b>	Undertook several in depth supplier reviews for suppliers in high risk countries or supplier high risk materials

Roy Hill has and will continuously improve its approach and management of modern slavery risks and report against the planned activities and metrics outlined above. The Modern Slavery Specification requires action to be taken in the following areas and Roy Hill will measure progress in line with the following:

- accountabilities
- the approach to operations and supply chain risk assessment and due diligence
- on-boarding and contracting requirements
- the auditing and compliance approach
- training proposals
- confidential internal reporting and annual external modern slavery reporting
- the approach to remediation of any issues arising.

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## 6. Consultation with subsidiaries / any entity owned or controlled

As outlined in the Structure section above, each Roy Hill subsidiary is a wholly owned subsidiary of Roy Hill Holdings Pty Ltd and Roy Hill operates as an integrated group (and financially reports on a consolidated basis). Policies, processes and systems are all prepared for the Roy Hill Group and applied to the Roy Hill Group consistently. Teams across all parts of the Roy Hill business have been consulted and have had input into this statement (and the formulation of the Roy Hill Group approach to Modern Slavery risks).



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## 7. Any Other Business

There is nothing additional to note for this reporting period.  
This Statement has been approved by the Boards of the Roy Hill Group.

Signed by



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Gregory P Hawkins, Company Secretary

Date: 21 December 2023

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