



Australian Modern Slavery Statement 2025

Tronox Limited

1. Introduction and Identification of Reporting Entities

This Modern Slavery Statement is made in accordance with section 14 of the Australian *Modern Slavery Act 2018* (Cth) (**MSA**) for the reporting period 1 January 2025 to 31 December 2025.

It is a joint statement issued by and on behalf of the following entities, which have been determined as reporting entities under the MSA for the reporting period:

- Tronox Limited (ABN 91 153 348 111), the Australian parent company;
 - Tronox Mining Australia Limited (ABN 60 009 247 858);
 - Tronox Pigment Bunbury Ltd (ABN 50 008 683 627); and
 - Tronox Management Pty Ltd (ABN 59 009 343 364),
- (together, the **Reporting Entities**).

This Modern Slavery Statement describes steps taken by the Reporting Entities and entities owned or controlled by those Reporting Entities to mitigate the risk of modern slavery in the entities' operations and supply chain.

The Reporting Entities form the Australian contingent of the Tronox group of companies, whose ultimate parent company is Tronox Holdings plc.

2. The structure, operations and supply chain of the Reporting Entities

2.1 Overview of Tronox

Tronox is one of the world's leading producers of high-quality titanium products, including titanium dioxide (TiO₂) pigment, specialty-grade TiO₂ products, high-purity titanium chemicals and zircon. In Australia, Tronox mines titanium-bearing mineral sands and operates upgrading facilities that produce high-grade titanium feedstock and other minerals including zircon and the rare earth-bearing mineral monazite.

Tronox's strategy is to be vertically integrated and produce enough feedstock to be as self-sufficient as possible in the production of titanium dioxide at TiO₂ pigment facilities located in Australia, the United States, Brazil, UK, France and the Kingdom of Saudi Arabia. With approximately 5,700 employees across six continents, our rich diversity, unmatched vertical integration model, and unparalleled operational and technical expertise across the value chain, position Tronox as the preeminent titanium dioxide producer in the world.

2.2 Corporate Structure

Tronox Limited is an unlisted public limited company, incorporated and domiciled in Australia. Its registered office is Lot 22 Mason Road Kwinana Beach Western Australia 6167. Tronox Limited is the Australian parent company of Tronox Management Pty Ltd, Tronox Mining Australia Limited and Tronox Pigment Bunbury Ltd, as well as other subsidiary companies.

Tronox's success is driven by a dedicated, diverse and highly skilled global workforce united by the company's values and business strategy, and a Code of Ethics and Business Conduct ("Code of Conduct") and its commitment to deliver industry-leading results in any operating environment.



2.3 Operations

The Reporting Entities' principal operations involve the mining of mineral sands and the beneficiation of those ores to produce feedstock materials that is processed into titanium dioxide for pigment and the manufacturing of titanium dioxide. These activities are conducted in the following areas:

Northern Operations

Cooljarloo Mine

Brand Highway
PO Box 31, Dandaragan
Cataby WA 6507

Chandala Processing Plant

742 Brand Highway
Muchea WA 6501

Tronox's Northern Operations comprise the Cooljarloo Mine and the Chandala Processing Plant in Western Australia, which together employ approximately 300 people and have been operating since 1989. At Cooljarloo, ore deposits are mined using dredging techniques and processed through a concentrator to produce heavy mineral concentrate (HMC). The HMC is then transported by road to Chandala, where it is further processed through a dry mill, synthetic rutile plant and residue management plant. Zircon, rutile and leucoxene are either bagged or sold in bulk, while ilmenite is upgraded into synthetic rutile through a process of reduction, aeration and acid leaching.

Kwinana Pigment Plant

Lot 22 Mason Road
Kwinana Beach WA 6167

At Tronox's Kwinana Pigment Plant, high-grade titanium feedstock (including synthetic rutile from Chandala) is processed using the chlorine method to produce TiO_2 pigment which is then surface treated, dried and milled into a fine white powder. Located in the Kwinana Industrial Area, the facility commenced operations in 1991 and employs around 420 people, including a sales team based in Henderson.

Bunbury Pigment Plant

Kemerton Plant

869 Marriott Road
Kemerton Industrial Park, WA

Australind Finishing Plant

Old Coast Road
Australind WA 6233

Tronox's Bunbury Pigment Plant operates across two sites in the Kemerton Industrial Park (24km north of Bunbury) and the Australind Finishing Plant. In Kemerton, the plant occupies a 55-hectare site that it shares with satellite plants supplying raw materials such as chlorine, caustic soda, gaseous oxygen and nitrogen. The resulting TiO_2 slurry is then transferred to the nearby Australind Finishing Plant for surface treatment, drying and milling into a fine white powder. Together, the two sites employ around 280 people.

Southern Operations

Wonnerup Mine

Sues Road
Wonnerup WA 6280

North Shore Mineral Separation Plant

Lot 962 Koombana Drive
Bunbury WA 6230

Tronox's mining operations in the South West region of WA include the Wonnerup mine and North Shore Mineral Separation Plant, located adjacent to the Bunbury Port. At Wonnerup, dry mining is used to extract mineral sand which is pumped to a plant to recover heavy minerals from the sand and clay using a series of gravity spirals. This is transported to North Shore for further separation and processing. Together, the two sites employ around 120 people.



Eastern Operations

Atlas Mine

Magenta Wampo Road
Hatfield NSW 2715

Broken Hill Mineral Separation Plant

138 Pinnacles Road
Broken Hill NSW 2880

Tronox's Eastern Operations are located in the Murray Darling Basin and including the Atlas Mine (140km north-east of Mildura) and Broken Hill Mineral Separation Plant. Extractive mining at Atlas began in 2022, where a dry mining technique is to extract ilmenite, rutile, leucogene and zircon from ancient coastal deposits. The ore is initially concentrated at site before the heavy mineral concentrate is transported to Broken Hill. Tronox employs around 170 people at its Eastern Operations.

2.4 Supply Chain

The Reporting Entities' supply chain personnel are based in Western Australia, Victoria and New South Wales, with support from a global team as required. The following provides a high-level overview of industry categories relevant to the supply chain.

- Capital
- Chemicals
- Engineering
- Energy
- Environmental
- Equipment Hire
- Exploration & Mining
- Facilities
- IT & Telecom
- Labour Hire
- Leases
- Logistics
- Maintenance Services
- MRO
- Packaging
- Professional Services
- Royalties, Native Title, Land
- Utilities
- Warehousing/Leasing

The majority of the Reporting Entities' suppliers are Australian entities, supplying products and services from Australia and other jurisdictions. For some projects, given the highly specialised nature of the services required in operations, subcontractors are approved before they can start work and nominate pre-approved vendors for consideration by contractors.

Specifically, the Reporting Entities' have over 3,500 active suppliers that support the Australian region. While goods and services are sourced from 33 countries around the globe, over 94 percent of suppliers are based in Australia. The following table illustrates suppliers active in the reporting period in further detail:

Country of Origin	Suppliers (%)
Australia	94.61%
United States	1.56%
China	0.98%
United Kingdom	0.41%
Singapore	0.41%
New Zealand	0.29%
Germany	0.23%
India	0.23%



France	0.17%
Thailand	0.17%
Canada	0.12%
South Korea	0.12%
Others (12 vendors)	0.70%

3. Risks of Modern Slavery Practices and Actions to Address, Including Due Diligence and Remediation

3.1 In Operations

The Reporting Entities' operational modern slavery risk is low. Their employees and contingent labour workforce are predominantly service providers located in Western Australia and New South Wales. The Reporting Entities are confident that, as a result of recruitment, remuneration and compliance programs, there is low risk that any of their employees are enslaved. Similarly the Reporting Entities' contingent labour workforce is supplied by reputable global and national agencies who are required to comply with domestic and international laws.

Employees are required to undertake regular training in the Code of Conduct. In addition, Tronox employees are required to certify upon commencement of employment with Tronox that they have read and understood the Code of Conduct.

The Code of Conduct also provides that if a Tronox employee needs guidance on an ethical or legal question or has knowledge of a potential violation of the Code of Conduct, policies or procedures, he or she must seek advice from one or more of a list of resources or report it via a 24-hour "Speak Up" Hot Line. The same channels are open to third parties.

All reports of alleged violations will be investigated. If the results of an investigation indicate that corrective action is required, Tronox will decide the appropriate steps to take, including discipline, up to and including termination of employment or, in the case of a third party, the business relationship.

Tronox employees also have access to an Employee Assistance Program, a free service where they can anonymously seek advice/counsel/support on any concerns of a personal or work based nature.

3.2 In Supply Chains

In order to qualify as a supplier to Tronox, suppliers are assessed in accordance with a number of factors including environmental and safety standards and compliance. Tronox performs background checks on new suppliers and we will not hire suppliers with red flags related to modern slavery or trade embargos. Tronox undertakes a heightened due diligence scrutiny of suppliers in areas of the world, or activity, that carry higher risk. Our compliance procedures contemplate corrective action.

Tronox is committed to ensuring that slavery and human trafficking is not taking place in any form within Tronox's business or any part of its supply chain. In line with this Tronox has in place policies and procedures to ensure the deterrence of any such conduct including the Code of Conduct.

Additionally, Tronox has established a specific Supplier Code of Conduct (Supplier Code of Conduct). Tronox expects our suppliers to adhere to both the Code of Conduct and Supplier Code of Conduct, which set out our expectations to ensure issues of human trafficking and slavery do not take place in its business or supply chains. Tronox is committed to complying with all applicable laws, rules, and regulations governing employment, immigration and labour relations, including child labour, working hours and fair wages, and expects each of its suppliers to act accordingly. The use of child labour by suppliers and representatives is prohibited.

The Supplier Code of Conduct is incorporated as part of Tronox's template supply contracts. Breach of contract, including breach of the Supplier Code of Conduct, allows Tronox to terminate the contract. The Supplier Code of Conduct sets forth the expectation that Tronox's suppliers shall protect the



human rights of their employees, to treat them with dignity and respect, and shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labour. This includes a prohibition on the transportation, harbouring, abduction, fraud, or payments to any person having control over another person for purposes of exploitation.

As part of this commitment to prohibit human trafficking, suppliers may not engage in any of the following conduct:

- destroying, concealing or confiscating identity or immigration documents;
- using fraudulent recruiting tactics; or
- charging employees unreasonable recruitment fees or providing inadequate housing based upon local standards, laws and directives.

In addition, Tronox's template supply contracts require suppliers to comply with relevant obligations under the MSA including:

- to identify any risks of Modern Slavery in its operations and supply chains and those of any entities that the supplier owns or controls;
- to assess suppliers and subcontractors, and prospective suppliers and subcontractors, against identified risks; and
- to implement processes and procedures to identify, assess, address, manage, prevent and mitigate the risk of Modern Slavery arising, including due diligence and remediation processes.
- to comply with their reporting obligations under the Modern Slavery Laws.

Our key suppliers are asked to report on measures taken by them to address modern slavery risk.

Further, Tronox does not and will not get involved in the raw material sector connected to illegal or unlawful exploitation of commodities and resources that, directly or indirectly, finances or benefits armed groups in conflict areas.

As a member of the Responsible Mining Initiative (RMI), we require all of our suppliers of conflict minerals to demonstrate that they have been approved by RMI so that we may comply with our obligation to submit to RMI a confidential report on the Conflict Minerals Reporting Template (CMRT).

4. Assessing and Addressing the Effectiveness of our Actions

The Reporting Entities continue their efforts on understanding supply chain risk and educating key personnel, including those in the Supply Chain function, in relation to modern slavery risk and are committed to ongoing review of our operations and supply chains to identify potential modern slavery risks and determine appropriate actions to address these risks.

On a contract by contract basis Tronox conducts due diligence according to risk as a means of assessing the effectiveness of those actions.

The effectiveness of our modern slavery training is measured through the evaluation of key supplier responses to our modern slavery requests as they are received and we continue to investigate and research our supply chains to better understand the supply chain back to the raw materials. In addition, Tronox has commenced use of a risk-based assessment program for suppliers in our key procurement areas, leveraging existing efforts in this area within Tronox where possible

Tronox monitors and reviews complaints raised to its Speak Up hotline service, as well as calls made to the Employee Assistance Program. In 2025, there were no grievances raised via either of these services in relation to modern slavery.

Tronox has not been required to undertake any remediation processes within the Reporting Period. However, should Tronox identify that it has caused or contributed to modern slavery, the actions considered would include:



- Cessation of action causing the harm;
- Use of leverage to mitigate any harm; and
- Remediation for those who have been impacted.

5. Process of Consultation

This statement reflects the position of each of the Reporting Entities. This statement will be published on the internet on the Australian Government's Online Register for Modern Slavery Statements, as well as Tronox's global website at www.tronox.com.

This statement was approved by the board of directors of each of the Reporting Entities.

The Reporting Entities covered by this modern slavery statement, as well as their owned and controlled entities, all share at least one Director and the same Company Secretary who has responsibility for the drafting of this statement following consultation with all relevant stakeholders including the Legal, Supply, Human Resources and Compliance teams.

A draft version of the statement was reviewed by all directors of those entities before being submitted for endorsement and approval, and a responsible member of Tronox has signed the statement on behalf of all of the Reporting Entities.

6. Other Information

The Reporting Entities form part of the Tronox group whose culture is deeply rooted in ethics and compliance. On the Tronox global website comprehensive information is provided about the policies, principles and procedures that embody our ethics and compliance-oriented corporate culture. This information is made available so that all of our employees, suppliers and other key stakeholders can better understand how we translate ethics and governance values into our day-to-day operations.

Tronox believes strongly in the basic rights of its workers and contractors. These rights include health, safety and security, non-discrimination, and fair remuneration. Tronox embraces our responsibility to respect human rights across our global supply chain. We are a values-based organisation with a long-standing commitment to improving the human capital of our employees, contractors and the individuals who live in the communities where we operate. Keeping our employees and contractors safe and developing their full human potential is central to our values.

Tronox is a member of UN Global Compact and is committed to making its 10 principles – many of which are directly related to human and labour rights – part of the values, culture and day-to-day operations the company.

An important part of our commitment to human rights is ensuring that child labour, slavery or human trafficking are not taking place in any form within Tronox's business or any part of its supply chain. This commitment is encapsulated in our Modern Slavery and Human Trafficking Statement, as well as our Code of Conduct and Supplier Code of Conduct.

We maintain a host of policies, practices and procedures designed to ensure that we respect human rights by fighting against discrimination based on race, nationality, gender, sexual orientation, age, ancestry, religion, or ethnicity. We actively encourage all of our employees to report any actual or suspected discrimination through our Speak Up hotline.

Guided by the company's values of responsibility, respect and relationship building, Tronox received endorsement for its second Reconciliation Action Plan (RAP) which outlines the company's formal commitment to advancing respectful relationships with First Nations people. The RAP supports the values inherent in the prevention of modern slavery.

Some of the key governance and policy documents that support our commitment to human and labour rights include the following:



- Code of Conduct
- Supplier Code of Conduct
- Freedom of Association Policy
- Diversity and Inclusion Policy
- Procurement and Governance Policy
- Conflict Minerals Policy
- Ethics, Compliance and Whistleblower Policy
- Anti-Money Laundering Policy
- Anti Bribery Laws Policy
- Ant-Harassment, Workplace Violence and Equal Opportunity Policy
- Labor & Human Rights Report

Duly signed by:

Christine Williams

Director Tronox Limited and Company Secretary of the other Reporting Entities