



GRANGE RESOURCES LIMITED

ABN 80 009 132 405

MODERN SLAVERY STATEMENT

UNDER THE MODERN SLAVERY ACT 2018 (CTH)

REPORTING PERIOD: 1 January 2023 – 31 December 2023

Grange Resources Limited ABN 80 009 132 405

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Director's Statement

As Director and Chairperson of the Audit and Risk Committee of Grange Resources Limited, I am pleased to present our 2023 Modern Slavery Statement.

Throughout 2023, Grange continued our strong commitment to identify and assess potential human rights issues within our operations and supply chains, whilst also aligning with our ESG core metrics.

The 2023 Modern Slavery Statement provides an update relating to our continual journey to combat modern slavery. We have made further steps to embed related risk reviews into our Management Operating System (MOS), along with updates to Anti-Corruption policies and procedures, tendering pre-qualification and contract terms and conditions, working collaboratively with our partners and stakeholders. We continue to draw on past experiences and knowledge to guide our strategies and enable us to drive precise actions aimed at the prevention of modern slavery.

We continue to support the fight against modern slavery and are committed to learning, improving, and ensuring that our operations contribute to a fair and ethical global economy.

This 2023 Modern Slavery Statement has been approved by the board of Grange Resources Limited in their capacity as the principal governing body of the company. We have reviewed and confirmed the contents of this Statement in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

Thank you to our teams, partners, stakeholders, and communities for their continuous support in upholding our ethical commitments.

Together, we can contribute to a fair and ethical global economy.

Sincerely,

Fong Chong Hoon

[Fong Chong Hoon \(Aug 31, 2024 19:39 GMT+10\)](#)

Director and Chairperson of the Audit and Risk Committee

Aug 31, 2024

Date



Part One: Who we are and what we do

Our Structure

Grange Resources Limited is a leading Australian magnetite (iron ore pellets) producer based in Tasmania.

Grange Resources Limited is an Australian Public Company, listed on the Australian Securities Exchange (ASX: GRR). Our largest shareholder is Shagang International Holding Ltd (Hong Kong), which in turn is under the ownership of Jiangsu Shagang International Trade Co. Ltd. (“**Shagang Group**”). The mandatory reporting entity under the Act is Grange Resources Limited ABN 80 009 132 405 (“**Grange Resources**” or “**Grange**”).

Grange owns and/or controls the following entities that are not, individually, mandatory reporting entities under the Act:

- Ever Green Resources Co., Limited¹
- Grange Tasmania Holdings Pty Ltd
- Bevion Pty Ltd
- Grange Resources (Tasmania) Pty Ltd
- Grange Capital Pty Ltd
- Grange Administrative Services Pty Ltd
- Barrack Mines Pty Ltd
- Bamine Pty Ltd
- BML Holdings Pty Ltd
- Horseshoe Gold Mine Pty Ltd
- Grange Resources (Southdown) Pty Ltd
- Grange Resources Investments Pty Ltd
- Southdown Project Management Pty Ltd

(Referred to collectively throughout this Statement as “Grange Resources”, “Grange”, “we”, “us”, and “our” unless otherwise specified)

Our Operations

With a rich history spanning over half a century, Grange Resources is at the forefront of iron ore mining and processing at our Savage River mine and Port Latta processing plant.

Our primary operations entail the management and operation of the Savage River integrated iron ore mining and pellet production business, located in the north-west region of Tasmania.

¹ This entity is incorporated in Hong Kong, registered as a foreign company under the Corporation Act 2001 (Cth)
Registered Office: 34a Alexander Street, Burnie, Tasmania 7320



Our Port Latta facility, strategically situated on Tasmania's northwest coast, houses a pellet plant and port facility, producing approximately 2.5 million tonnes of top-tier iron ore pellets annually.

We've established a robust sales network encompassing spot and contractual agreements, ensuring the seamless delivery of our pellets to customers across the vast Asia Pacific region.

In Western Australia, Grange holds 100 per cent ownership in the Southdown Magnetite Iron Ore Project.² Grange commenced a Definitive Feasibility Study on the 5 Mtpa development case, and its progress is under review.

During the reporting period, Grange employed 642 professionals across our operations at our Port Latta Pellet Plant, Savage River Mining Operations and Concentrator, and our head office in Burnie, Tasmania. Their roles spanned from plant and mining equipment operations, maintenance roles including mechanical fitters, electricians and welders, engineering, geology, and environmental planning to IT, HR, finance, and administrative support.

In addition to our permanent staff, Grange leverages local labour hire companies and fixed-term contracts for personnel on a casual basis. On average, we employ approximately 128 contractors monthly, with roughly half serving in mining operator roles.

Impact of COVID-19 pandemic

Throughout 2023, Grange maintained rigorous safety controls to manage the impact of the global COVID-19 pandemic. Building on our commitment to operational excellence, we upheld stringent safety protocol established in 2022. As a result, despite the pressures on our supply chains, our procurement practices remained robust, ensuring no escalation in our overall modern slavery risk profile.

Our Supply Chains

A broad range of suppliers support our mining operations and head office functions. During the reporting period, we procured goods and services from 848 suppliers, which ranged across the following industry categories:

- Mining equipment and related parts
- Electricity and gas
- Blasting services and materials
- Civil and building construction
- Exploration drilling
- Chemical products
- Industrial machinery and equipment
- Motor vehicle parts

² [Media Release - Grange Reacquires Joint Venture Partner's interest in the Southdown Magnetite Project](#)



- Non-building construction providers and equipment
- Petroleum and coal products
- Computer and technical services
- Education and training providers
- Pumps and appliances
- Catering and cleaning services
- Waste disposal
- Freight and logistic services
- Accommodation
- Electrical equipment
- Advertising and promotional material
- Business and consulting services
- Engineering services
- Australian based labour hire providers
- Equipment hire
- Fabricated metal products
- Technical services
- Consumables
- Tyres
- Security services

These suppliers are predominantly located in Australia. We also have supplier relationships with the following international suppliers:

- Machinery and mechanical parts suppliers from Germany, Canada, China, India and Malaysia
- Business, legal, consulting and subscription services based in New Zealand, Singapore, USA, India, Canada and the UK
- Wholesale traders in the USA
- Filter material supplier in the USA
- Non-metallic mineral suppliers based in India
- Software providers based in the USA and UK
- An e-commerce subscription service supplier in China

Part Two: Assessing Modern Slavery Risks in our Operations and Supply Chains

Throughout the reporting period, Grange maintained a vigilant stance against modern slavery practices, with no reported incidents occurring within our operations or supply chains.

In our unwavering commitment to ethical and responsible business conduct, we performed a comprehensive risk assessment of our operational supply chains through an external subject



matter expert SAAS platform. This exercise scrutinized a total of 848 of our direct (first-tier) suppliers.

This sophisticated risk assessment utilized proprietary technology to analyse a range of factors, all aimed at gauging the potential exposure to modern slavery up to the tenth tier of our supply chain:

- The aggregate financial value of our direct supplier contracts
- The industry category, encompassing industries that subsequently contribute to specific categories down the supply chain
- The geographical operational area
- The depth of tiering within the supply chain(s), e.g., 3rd tier supplier, 5th tier supplier, etc

For a detailed insight into the proprietary risk assessment methodology used for the initial risk assessment, please refer to the Appendix of this statement.

The risk assessment identified that our **direct (tier one) suppliers** within the following industry categories posed the most significant cumulative potential modern slavery risk within our supply chains:

- Non-Metallic Mineral suppliers operating in India
- Australian Petrol and Diesel Suppliers
- Australian Non-building Construction suppliers

We are committed to ongoing vigilance and improvement in the fight against modern slavery, and these insights guide our approach to risk mitigation in our supply chains.

India-Based Non-Metallic Minerals Suppliers

The sector of non-metallic minerals, particularly those procured from suppliers in India, has been appraised as having the most substantial potential exposure to modern slavery risk. This category represents around a quarter of the total relative slavery risk identified within our supply chains.

The suppliers operating in this category are deemed high-risk due to the 'multiplier effect' of functioning within a high-risk industry and a high-risk geography concurrently.

Australian Petrol and Diesel Suppliers

Suppliers of petrol and diesel-related products within Australia are identified as potential source of modern slavery risk exposure. Distinct from the *Non-Metallic Minerals from India*



category, the risks associated with this industry primarily reside at the second tier of the supply chain (i.e., our supplier's suppliers).

This second tier typically comprises the actual extraction and refining suppliers, which may have operations abroad in higher risk geographies. These suppliers may pose risks similar to those identified in relation to *Non-Metallic Minerals in India*.

Australian Non-Building Construction Suppliers

The industry category titled 'Non-building Construction', encompassing Australia-based suppliers, is another sector presenting potentially heightened modern slavery risks. This sector shares characteristics with our operations, particularly a low entry barrier for vulnerable migrant workers lacking formal qualifications. Roles in this industry are often temporary or subcontracted, which may obstruct thorough oversight of labour conditions.

Additionally, the commonly used construction tools and equipment are frequently manufactured offshore in high-risk Southeast Asian locations and may comprise high-risk raw materials sourced from regions with reported instances of child and forced labour.

Risks Pertinent to Our Operations

Grange acknowledges that, within the global context, mining operations are susceptible to potentially elevated modern slavery risks. This international, industry-category-based risk encapsulates factors tied to the employment of labour hire services.

Our preliminary risk assessment incorporated the examination of 55 distinct labour hire providers of various categories.

Our contracted workforce includes a combination of highly skilled professionals, such as engineers and specialized technicians, and tradespersons engaged in less skilled roles like machinery operation. We recognize that under certain conditions, contractual agreements can heighten modern slavery risks due to limited direct visibility into the conditions of labour hire.

We have an existing Whistleblower policy accessible to all contracted workers. We promote an open and transparent workplace and support employees with a number of avenues to protect their rights with any appropriate representation as required.

Part Three: Actions Taken to Assess and Address Modern Slavery Risks

Grange is advancing beyond the initial stages of developing a long-term framework for mitigating modern slavery risks. Our progress is exemplified by the significant measures we've already implemented during this reporting period.



Desktop Auditing of Highest Risk Suppliers

We have conducted this desktop audit, utilizing proprietary analytics based on our actual procurement data of 8489 suppliers. This has offered us a detailed and precise appraisal of our potential risks. These results guide our forthcoming reporting period and actions on the due diligence measures on our suppliers.

Supplier Questionnaires

In 2023, Grange has integrated supplier questionnaires into our contract management and tendering processes. This initiative ensures that new contracts and tender evaluations include comprehensive assessments through supplier questionnaires. These efforts are aimed at enhancing transparency and accountability across our supply chain, reinforcing our commitment to identifying and mitigating potential risks, particularly concerning modern slavery.

Internal Governance and Policies

In 2023, Grange has achieved significant milestones in enhancing our internal governance and policies. We successfully finalised and implemented the Supplier Code of Conduct, reinforcing our commitment to ethical practices throughout our supply chain. Additionally, we updated our anti-Bribery and Corruption Policy, aligning it with industry best practices and regulatory requirements. These efforts reflect Grange's active commitment to mitigating risks and upholding high standards of integrity and transparency in all aspect of our operations.

Environmental, Social and Governance (ESG)

Throughout 2023, Grange continued to review and enhance its management systems to align with ESG core metrics, as outlined by the World Economic Forum's (WEF) standardised Capitalism Metrics ESG framework. Building on the baseline Environmental, Social, and Governance (ESG) report published in August 2022, Grange made significant steps across governance, environmental stewardship, social impact, and economic performance.

The baseline report underscores Grange's commitment to sustainable development goals, detailing progress across the framework's four pillars: Governance, Planet, People, and Prosperity. Notably, Grange has developed a comprehensive roadmap aimed at reducing emissions. This includes initiatives to decrease energy consumption per tonne of product, enhance furnace efficiency, harness heat recovery in the pellet plant, integrate advanced technologies and electric vehicles in mining operations, and explore alternative fuel sources.



Part Four: Measuring Effectiveness

Throughout the reporting period, we have made significant progress on the following identified benchmarks and have added new crucial indicators for progress. Our intention is to foster continual improvement, while consistently building upon the actions implemented in each subsequent reporting period. Our goal is not merely to meet standards, but to consistently elevate our practices in an enduring commitment to eradicate modern slavery.

Focus Area	KPIs for 2023	% completion	KPIs for 2024
Risk Identification	Expand desktop audit to suppliers under the Southdown project. Increase supply mapping to include Shipping	100% completed.	Continue to attend webinars and undertake research to further identify potential high-risk categories within our supply chain. Utilise the SAAS platform to conduct thorough risk assessment focused on select suppliers.
Supplier Engagement	Issuing the questionnaires to high-risk suppliers (excl. labour hire contractors).	100% completed.	Fully integrated suppliers' questionnaire into Contract Managing process.
Due Diligence	Undertaken desktop auditing on highest risk supplies, focusing on the industry categories identified in Part Two	100% Completed – performed desktop auditing through SAAS platform of suppliers used during 2023 Calendar Year.	Continue to assess modern slavery risks on the new suppliers. Continue to engage with external subject matter expert to perform another desktop audit through SAAS platform.
Internal Governance & Policy Frameworks	Develop full suite of Modern Slavery Framework. Roll out of the questionnaires as part of Tender Process and On-Boarding.	In- Progress – develop full suite of Modern Slavery Framework 100% completed. – roll out of Modern Slavery Questionnaire as part of Tender Process.	Review of Supplier on-boarding software to incorporate Modern Slavery Questionnaire as part of vendor approval process for new and existing suppliers.
	Developing and applying full suite of modern slavery related policies, including a Supplier Code of Conduct and modern slavery contract provisions.	100% Completed – develop the Supplier Code of Conduct	Continue to incorporate changes to externally provided contracts.

MODERN SLAVERY STATEMENT



GRANGE
RESOURCES

Focus Area	KPIs for 2023	% completion	KPIs for 2024
	<p>Facilitation of the modern slavery working group including expanding the mandate and makeup of the group.</p> <p>initiate Modern Slavery Committee and its objectives and deliverables.</p>	In-Progress – establish the Modern Slavery Committee and finalise objectives and deliverables (charter).	In Progress - initiate Modern Slavery Committee and its objectives and deliverables.
Remediation	Respond to any instances of modern slavery identified and implementation of appropriate corrective actions	On-going	On-going
Training and Education on the Modern Slavery	Modern Slavery Awareness Program	In-Progress - incorporate the training program as one of awareness program's objective and deliverable	100% target - roll out the Modern Slavery Awareness Program across Grange.



Appendix – Initial Risk Assessment Methodology Summary

1. As discussed in Part Two of this Statement, we have established a continuous partnership with an external subject matter expert SAAS platform to conduct thorough risk assessment focused on select suppliers. The evaluation serves as the cornerstone for our sustained due diligence and corrective actions, extending beyond the current reporting period into forthcoming years. By doing so, we ensure a persistent and proactive approach towards risk mitigation, underpinning our enduring commitment to combat modern slavery in our supply chains.
2. Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Grange's top suppliers by spend.
3. This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:
 - a. The United Nations' (UN) System of National Accounts;
 - b. UN COMTRADE databases;
 - c. Eurostat databases;
 - d. The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
 - e. Numerous National Agencies including the Australian Bureau of Statistics.
4. The MRIO is then examined against the following international standards:
 - a. The UN Guiding Principles on Business and Human Rights;
 - b. The Global Slavery Index;
 - c. International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
 - d. The United States' Reports on International Child Labour and Forced Labour.



5. A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier.
6. This analysis was performed for the purposes of risk identification under the Act. It does not purport to confirm the actual existence (or non-existence) of slavery in Grange's supply chains and operations. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.
7. The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:
 - a. The individual suppliers and industries with the most elevated risk of modern slavery;
 - b. Supply chain plots to provide a visual representation of the supply chains for Grange's top 3 first tier industries;
 - c. Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
 - d. Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world;
 - e. An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk; and
 - f. Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.