2025 MODERN SLAVERY STATEMENT

1. Introduction

1.1 Acknowledgement of Country

Metro Mining Ltd (Metro) works on the land and waters of the Ankamuthi People at Bauxite Hills Mine at Skardon River in Western Cape York, Queensland.

Metro Mining Acknowledges the Traditional Custodians of Country throughout Australia and we recognise the continuing connection to lands, waters and communities.

We pay our respect to Aboriginal and Torres Strait Islander peoples and to Elders past and present.

1.2 About this Statement

Metro Mining's Modern Slavery Statement (Statement) outlines the Company's commitment and actions taken to identify, manage and respond to modern slavery risks in our operations and supply chain. The Statement has been prepared in accordance with Australia's *Modern Slavery Act 2018* (Cth) (Modern Slavery Act) and relates to Metro Mining's financial year ending 31 December 2025 (FY2025).

All references to our, we, us, the Group, the Company, Metro Mining, refers to Metro Mining Ltd (ABN 45 117 763 443) and its subsidiary Metro Bauxite Hills Operations Pty Ltd (ABN 25 101 655 298).

1.3 Our approach

We are committed to acting ethically, transparently and responsibly in all that we do. Modern slavery and human rights abuses have no place in our organisation or supply chain, and we maintain a zero-tolerance stance against any such practices.

Our response to managing the risks of modern slavery in our operations and supply chains continues to be guided by the United Nations Guiding Principles on Business and Human Rights.

2. Modern Slavery Act mandatory criteria

The following table details each of the mandatory criteria in section 16 of the Modern Slavery Act and the relevant page number/s of the Statement addressing the criteria to demonstrate Metro Mining's compliance with the reporting requirements:

Mandatory Criteria	Page number/s
1. Identify the reporting entity	1

2. Describe the reporting entity's structure, operations and supply chains	2-4
3. Describe the risks of modern slavery practices in the operations and supply	4-6
4. Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes	6-7
5. Describe how the reporting entity assesses the effectiveness of its actions	8
6. 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)	8-9
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant	9

3. Overview of structure, operations and supply chain

3.1 Business overview

Metro Mining Limited (ASX: MMI) is an Australian mining and exploration company. Metro's flagship project is the Bauxite Hills Mine, which is a single operating mine combining two Environmental Authorities covering the Bauxite Hills and Skardon River tenements.

Our Vision is "To be the Premier Bauxite Supplier".

Our Purpose is to responsibly produce quality bauxite for our customers delivering value to them and our investors. We are a safe and supportive community, working together to provide opportunities for sustainable benefits to Cape York.

3.2 Operations

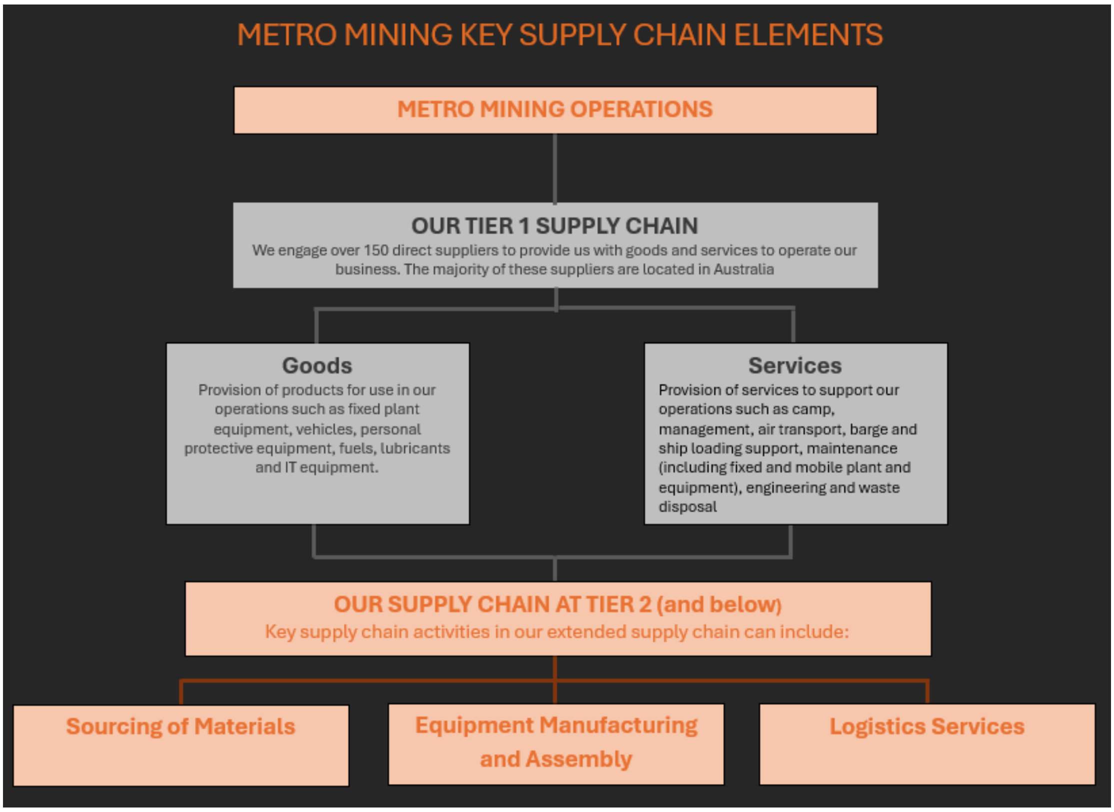
Metro Mining owns 100% of the Metro Bauxite Hills Operation, which is located 95 kilometres north of Weipa in Queensland's Weipa Bauxite region. The Bauxite Hills Mine has an estimated Reserve of 69.6 million tonnes (Mt) and a total Resource of 107.4 Mt and has been operating since April 2018. Bauxite Ore from the mine is predominantly shipped to meet China's growing bauxite market; where Cape York bauxite is well known and highly regarded.

In addition to our mining operations, in 2023 the Company established a marine division and in early 2024 we welcomed our offshore floating terminal, Ikamba, to the Port of Skardon where it commenced transhipping operations in tandem with our transhipping contractor's floating crane. In 2025, Metro also incorporated our own Tug 'Mandang' into operations working alongside our contractor's fleet of tugs. Our shipments to customers for the year ended 31 December 2025 totalled 6.2 million Wet Metric Tonnes; a new record for Bauxite Hills Mine and a 9% increase from 2024 shipments.

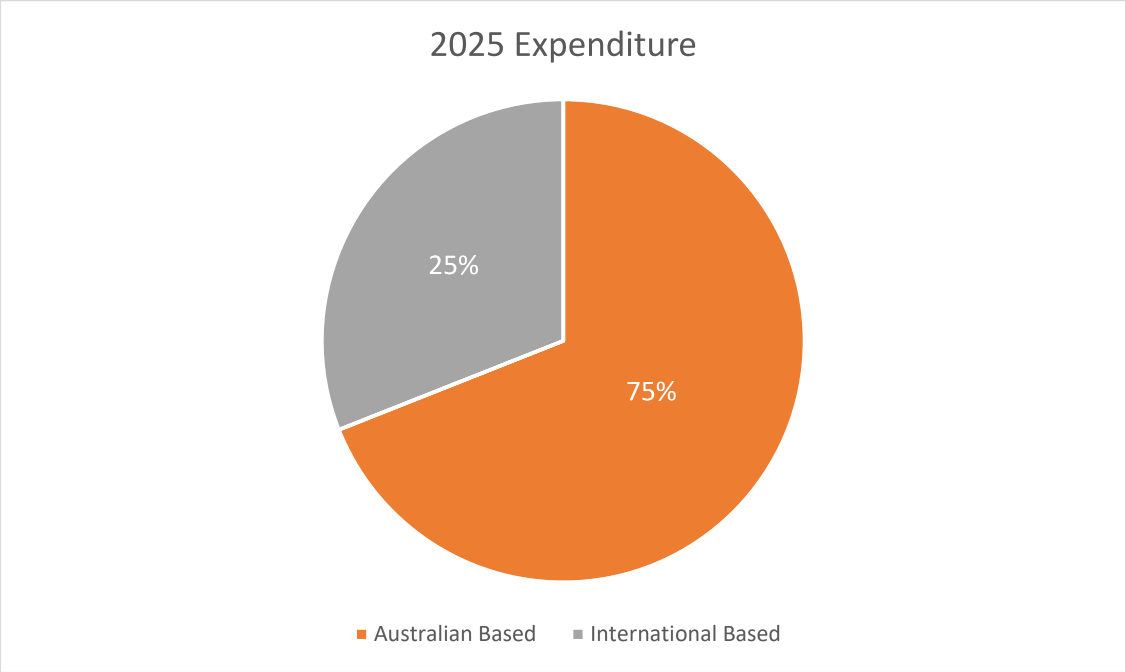
As of December 2025, Metro Mining employed 299 permanent and maximum term employees, 44 casual employees and 25 labour-hire personnel across our mining, marine and corporate divisions; a total of 368 people.

3.3 Supply chain

Our supply chain relates to the mining and shipping of bauxite to China. This includes suppliers of mining equipment (trucks, mobile plant, vehicles, fixed plant, etc), fuel and other critical consumables, telecommunications, and site supplies including clothing, tools, personal protective equipment, etc. Certain services such as transshipping (excluding those that are provided by our own transhipper, Ikamba and our own tug, Mandang), camp facilities, catering, maintenance, labour hire and specialist technical services, IT services and cultural heritage are provided by Australian contractors, with management, administration, mining, operations and technical services activities undertaken by direct employees. IT services will be delivered by direct employees in 2026.



In 2025, Metro Mining's expenditure on goods and services totalled $286.5M. Australian-based suppliers represented 75% of this expenditure. The balance 25% largely relates to costs associated with ocean freight, with these vendors being based in either Singapore or Germany.



4. Modern slavery risks in our operations and supply chain

The Modern Slavery Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced labour; debt bondage; forced marriage and; the worst forms of child labour.

Modern slavery risk is likely to arise:

- where workers have fewer protections through inadequate laws and regulations, weak or non-existent enforcement, and poor business and government accountability;
- where there are high levels of poverty among workers;
- where there is widespread discrimination against certain types of workers (e.g. women and ethnic groups);
- where there is widespread use of migrant workers;
- in certain geographical locations with the heightened risk of modern slavery practices, such as conflict zones; and
- in some specific high-risk industries.

While Metro Mining's operations are primarily based in Australia, where there are strong legal protections for workers, we recognise that modern slavery risks can still arise in domestic contexts. This is particularly relevant in labour hire, cleaning, catering and other services commonly associated with vulnerable or temporary workforces. Accordingly, we do not consider our operations to be risk-free and continue to apply appropriate controls and oversight across both our Australian and international supply chains.

We note that the Australian Anti-Slavery Commissioner's 2025-2028 Strategic Plan[1] has identified the following priority focus areas that directly affect the mining and maritime sectors:

- labour-hire and remote-site workforces;
- maritime crew welfare and recruitment practices;
- high risk imported goods (PPE, machinery and electronics);
- transparency and measurable effectiveness.

Metro Mining acknowledges these specific modern slavery risk exposures in its supply chain:

- the transportation of our product from Australia to China on ocean going vessels;
- procurement of a variety of goods including personal protective equipment and uniforms, construction materials, electrical parts and electronic equipment, tyres and wheels from high-risk jurisdictions;
- the procurement of food and beverage services;
- the procurement of resources and energy (eg: diesel fuel) sourced from complex global supply chains;
- procurement of subcontractor and / or personnel outside of Australia that provide labour on our assets;
- labour-hire providers in maintenance, cleaning and catering.

We also consider geopolitical instability, weak labour protections, and opaque subcontracting as contributing factors.

5. Modern slavery assessment and risk mitigation actions

5.1 Risk assessment methodology

Metro Mining assesses modern slavery risk using a structured methodology that considers both the likelihood of occurrence and the severity of potential harm to individuals.

Our assessment draws on a range of internal and external inputs, including:

- supplier location and geographic risk indicators;
- industry and commodity risk profiles;
- the nature of goods and services procured (eg: PPE, electronics, fuel);
- workforce characteristics, including the use of migrant labour, labour hire arrangements and remote-site workforces;
- publicly available resources and guidance, including those published by the Australian Anti-Slavery Commissioner and international guidelines.

We recognise that modern slavery risks are often more prevalent beyond Tier 1 suppliers. While our current visibility is primarily at the Tier 1 level, we are taking

[1] https://www.antislaverycommissioner.gov.au/system/files/2025-10/strategic-plan-2025-2028.pdf

steps to improve our understanding of deeper supply chain risks through supplier engagement.

In 2026 we will further enhance this approach by continuing these engagements with our key suppliers as well as through the development of Modern Slavery Risk Heat Map which will enable a more systematic evaluation and prioritisation of risks across our operations and supply chain.

5.2 Risk mitigation activities

Our standard contracts include modern slavery prevention provisions. These clauses place specific obligations on contractors and suppliers to not engage in and mitigate risks relating to modern slavery. Third party contracts are also reviewed by our in-house legal team along with our procurement function to ensure modern slavery provisions are inserted should they be missing from the contract and that risks are identified and are appropriately managed.

If labour activities are being undertaken in a location outside of Australia on one of our assets, we ensure we have a physical presence during those activities to ensure there is no circumstances that could be representative of modern slavery.

In respect of the modern slavery risks associated with seafarers that are engaged on vessels transporting our product, the freight contracts that are entered into with the vessel owners require the crew to be engaged on a valid International Transport Workers Federation Agreement (ITF Agreement). This ensures the crew receive an internationally recognised minimum standard of pay and conditions.

In addition, Metro utilises RightShip as part of its vessel vetting process. RightShip is the world's largest third party maritime operational due diligence organisation. Its vessel vetting service is used for thousands of voyages to assess the suitability of a nominated vessel for safe cargo transportation. In order for a vessel to meet the RightShip Standard, it must satisfy its comprehensive vetting criteria which includes an assessment regarding crew welfare. In addition, vessels are randomly inspected by the Australian Maritime Safety Authority who will also seek confirmation of this. Vessels that do not have an ITF Agreement in place will be detained, which provides a strong incentive to vessel owners to comply.

During 2025 we also undertook the following additional activities in furtherance of our commitment to ensure that any form of modern slavery in our operations and supply chain is identified, evaluated and managed:

- a review of the Modern Slavery Statements Register was undertaken to identify which of our key suppliers had submitted statements in order to understand in more detail the modern slavery risks associated with their operations;
- a Supplier Code of Conduct and Supplier Sustainability Policy was approved by the Board and implemented – these documents detail the expectations we have of our Suppliers to operate in a safe, ethical,

socially conscious and sustainable manner (available on our website here: https://metromining.com.au/company/corporate-governance/);

- a Modern Slavery Self-Assessment Form was developed and issued to Metro's top 10 Suppliers by spend initially and is now provided to all suppliers / vendors as part of the onboarding process;
- a Metro Mining Modern Slavery Response Plan and Modern Slavery Incident Response Form was developed, ensuring a straightforward process for reporting and responding to actual or perceived incidents regarding modern slavery;
- ongoing monitoring by Metro's Legal and Governance Team across our operations and activities to ensure modern slavery risks were being considered and managed proactively.

6. Governance

Metro Mining recognises it has a role to play in identifying and influencing its supply chain to support the elimination of modern slavery practices.

We have a framework of policies and procedures to support our oversight and management of modern slavery risk, including the following:

1. Metro Mining Values;
2. Modern Slavery Policy;
3. ESG Policy;
4. Whistleblower Policy;
5. People Policy;
6. Anti-Bribery and Corruption Policy;
7. Risk Management Policy;
8. Supplier Code of Conduct;
9. Supplier Sustainability Policy;
10. Modern Slavery Incident Response Form;
11. Modern Slavery Response Plan; and
12. Modern Slavery Risk Self-Assessment Form.

Our policies are available for review on our website: https://metromining.com.au/company/corporate-governance/.

We are committed to responding appropriately where modern slavery risks or incidents are identified, with a focus on protecting affected individuals and preventing further harm. Our Modern Slavery Incident Response Form provides an opportunity for individuals to report allegations of modern slavery or human rights issues to us. This mechanism is further supported by our Whistleblower Policy.

If we identify actual or potential modern slavery practices in our operations or supply chain, our response will be guided by our Modern Slavery Response Plan. These actions include:

- promptly assessing the nature and severity of the risk or incident;

- engaging with the relevant supplier or contractor to understand the circumstances;
- prioritising the safety, welfare and rights of any affected workers;
- taking appropriate action where a finding of modern slavery or human rights issues have been substantiated, including the termination of the business relationship with the supplier and reporting them to relevant law enforcement and regulatory bodies.

Metro Mining's Board of Directors and Executive Leadership Team will also be briefed on any reported allegations of modern slavery and actions being taken to investigate the allegations.

7. Assessing effectiveness

In 2025, no instances of modern slavery were identified within our operations or supply chain and no reports were raised through our reporting mechanisms. While this outcome is positive, we recognised that the absence of reported incidents does not necessarily indicate an absence of risk.

In 2026, we will strengthen our processes to assess our effectiveness of our approach to identifying and addressing modern slavery risks by completing the Walk Free Modern Slavery Benchmarking Tool and establishing performance indicators. Quarterly reporting to the Audit and Risk Committee will also support ongoing oversight and continuous improvement.

8. Consultation

We consulted with the relevant companies we own or control in the development of this Statement. Consultation was undertaken internally through engagement between and Legal and Governance Team and key personnel across operations, procurement, marine and corporate functions.

This collaborative approach supports a consistent understanding of modern slavery risks and ensures alignment in the implementation of mitigation strategies across the Group.

9. 2026 activities

We acknowledge that the Commissioner has explicitly identified our sector as high-risk, increasing expectations for deeper due diligence and stronger oversight.

As highlighted earlier in this Statement, continuous improvement is important to manage and mitigate the risk of modern slavery in our sector. Our 2026 activities have been designed with this objective in mind and include:

- the review and update of our internal training materials that is provided to Legal and Governance team's annual training and awareness education schedule;

- direct engagement / consultation with our major suppliers to understand their planned activities to identify, manage and monitor modern slavery risks and to discuss potential opportunities for joint initiatives to reduce these risks;
- development of a Modern Slavery Risk Heat Map that evaluates risk across two dimensions (Likelihood and Severity of Harm) and considers recommended controls;
- completion of the Walk Free Modern Slavery Benchmarking Tool[2] to benchmark our current practices / activities to assess and address modern slavery risks and identify additional actions that can be taken;
- streamlining our internal processes in respect of the engagement with our suppliers /vendors on modern slavery risks and reviewing / assessing Modern Slavery Risk Assessment Forms;
- the inclusion of quarterly reporting to the Audit and Risk Committee on modern slavery risks and due diligence activities.

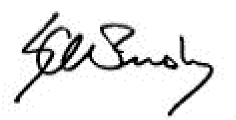
10. Feedback

We value all feedback on the content of this Statement, please visit the Metro Mining website, www.metromining.com.au, to provide feedback or request additional information.

11. Approval of Statement

This Statement has been approved by the Board of Metro Mining as the parent entity on 23 June 2026.

This Statement is signed by Simon Wensley in his role as the CEO and Managing Director of the parent entity on 23 June 2026.



Simon Wensley

CEO and Managing Director

Metro Mining Limited

[2] https://www.walkfree.org/resources/modern-slavery-benchmarking-tool/