



# 2021 Modern Slavery Statement

Our commitment to tackling modern slavery in all its forms

## **Acknowledgement of country**

OZ Minerals acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to the people, the cultures and the elders past, present and emerging.

OZ Minerals' Adelaide Office is located on Kaurna land, our Prominent Hill mine is located on Antakirinja Matu-Yankunytjatjara land, our Carrapateena mine is located on Kokatha land and our West Musgrave project is located on Ngaanyatjarra land.

## **Disclosure note**

This statement has been prepared as a joint statement pursuant to section 14 of the *Modern Slavery Act 2018 (Cth)* (the Act) by OZ Minerals Limited ABN 40 005 482 824 and ACN 005 482 824 and the following reporting entities for the reporting period 1 January 2021 to 31 December 2021:

**OZ Minerals Carrapateena Pty Ltd**

ABN 94 149 626 255 and ACN 149 626 255

**OZ Minerals Prominent Hill Operations Pty Ltd**

ABN 63 091 546 691 and ACN 091 546 691

**OZ Minerals Services Pty Ltd**

ABN 34 629 461 481 and ACN 629 461 481

**OZ Minerals Musgrave Operations Pty Ltd**

ABN 39 640 213 341 and ACN 640 213 341

**OZ Minerals Brazil (Holdings) Pty Ltd**

ABN 74 625 407 141 and ACN 625 407 141

**OZ Exploration Pty Ltd**

ABN 95 137 626 914 and ACN 137 626 914 (together 'OZ Minerals').

# Joint statement from our Chair and CEO



**We are proud to present OZ Minerals' second modern slavery statement. This statement acknowledges our responsibilities for tackling modern slavery in all its forms and reaffirms our commitment to complying with the Commonwealth *Modern Slavery Act 2018*.**

This statement outlines the actions we've taken in 2021 to assess modern slavery risks in our operations and supply chain and the practical mitigation strategies we've implemented. It builds upon the anti-slavery program reported in our 2020 statement and commits our organisation to a process of continuous improvement. We are committed to managing modern slavery risks across our Australian and international assets and the communities touched by our operations.

We will, together with our supply chain partners, government and community stakeholders, act ethically and in accordance with laws and conventions around the world that strive to protect and respect human rights.

The Board acknowledges the efforts and dedication of our people working on this important issue within OZ Minerals in Australia and internationally.

This statement was approved by OZ Minerals' Board of Directors on 18 February 2022. The Board will review and update the statement annually.

**Rebecca McGrath**  
Chairman  
Adelaide  
18 February 2022

**Andrew Cole**  
Managing Director and CEO  
Adelaide  
18 February 2022



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# About OZ Minerals

## Our context

**OZ Minerals is a global, copper-focused modern mining company based in South Australia with 4,733 workers (including contractors) as at 31 December 2021.**

**We are listed on the Australian Securities Exchange (ASX100) and our growth strategy focuses on creating value for our stakeholders— employees, communities, shareholders, governments, and suppliers. We have a devolved organisational model of corporate functions and assets that are further organised into various departments based on the work we do.**

OZ Minerals' purpose—*going beyond what's possible to make lives better*—directly reflects our aspirations for modern slavery risk management, to make the lives of vulnerable workers better. You can read more about our purpose on our [website](#).

We aim to create value for all our stakeholders including employees, shareholders, communities, government and suppliers, and measure our progress against key performance indicators, including:

- / total shareholder return
- / regional contribution
- / social and environmental performance
- / employee satisfaction
- / supplier approval.

Our [2021 Annual and Sustainability Report](#), provides more detail on our stakeholder value creation metrics.

We own and operate underground mining and processing facilities in Australia and Brazil. We also have a pipeline of earn-in agreements with experienced exploration companies in Australia and internationally to create organic growth opportunities.

Modern slavery is a global issue that businesses must address and prevent. OZ Minerals expects that our workforce and suppliers will not tolerate any adverse impacts on human rights within our assets or supply chains, including incidents of modern slavery. We recognise that slavery has the potential to exist within the supply chain in various forms, including:

- / forced labour
- / child labour
- / debt bondage
- / human trafficking
- / abuse of requirements for a minimum living wage
- / discriminatory employment practices.

Modern slavery is a complex issue and we will strengthen our approach to identify, assess, mitigate and address human rights risks, including modern slavery, as part of our Human Rights Performance Standard ([ozminerals.com/sustainability/performance-standards](https://ozminerals.com/sustainability/performance-standards)). Our global performance standards are informed by globally-recognised declarations, principles and goals, including:

- ✓ Universal Declaration on Human Rights
- ✓ United Nations Guiding Principles on Business and Human Rights
- ✓ UN Voluntary Principles on Security and Human Rights
- ✓ United Nations Sustainable Development Goals.

The risk of OZ Minerals directly causing modern slavery is low, but we could contribute to it indirectly through joint ventures and supplier partnerships. Our focus is therefore on working with our suppliers and joint venture partners to assess and address our modern slavery risks, while ensuring our operational risk management processes are robust.

## CREATING VALUE IS AT THE CENTRE OF OUR STRATEGY



# Highlights

## 2021 modern slavery risk management initiatives

### **In 2021 we focused on better understanding our modern slavery risks and impacts.**

We reviewed our systems and processes and undertook an operational gap analysis to identify risks and opportunities and better align our risk management system to international best practice on assessing human rights and labour rights risks. We formalised our Modern Slavery Stakeholder Team, which is comprised of senior leaders from key areas of our business, representing our assets in Australia and Brazil, and exploration activities.

We engaged our leadership and operational teams to help develop comprehensive modern slavery action plans for each asset. We consolidated actions from each of these plans into a single high level modern slavery strategic plan, which addresses five priority modern slavery goals and outlines a three-year road map. Together, these plans and strategies will inform our ongoing modern slavery risk management approach.

We ran a baseline modern slavery awareness survey for our workforce (135 participants) to determine how modern slavery is understood across our business. Close to 90 per cent of survey respondents understood that our supply chain carries a risk of modern slavery. All agreed that modern slavery risk management is highly relevant to our operations and supply chain. The survey identified knowledge gaps around modern slavery definitions and forms, as well as incident reporting and remedy, which we have been addressing throughout 2021.

We provided high-level awareness training to our Executive Leadership Team across Australia and Brazil on potential modern slavery risks in our operations and supply chain and the implications modern slavery has on our business. We also engage our Board's sustainability committee, which helps the Board to effectively discharge its responsibilities and manage the risks associated with sustainability, primarily in the areas of safety, health, environment, and community, including cultural heritage and human rights.



We educated our broader workforce on modern slavery and shared several modern slavery infographics on Yammer, in both English and Portuguese.



We updated our corporate risk register and documented key causes of modern slavery risk, along with preventative and mitigating controls.

We documented and prioritised our Tier 1 (direct) suppliers and supply categories against internationally recognised modern slavery risk indicators and invited 31 of our highest risk Australian suppliers (accounting for 60 per cent of our high risk spend) to participate in a self-assessment questionnaire.

In late 2021 we invited our highest priority/highest risk Brazilian suppliers to undertake a deep dive self-assessment questionnaire (provided in Portuguese). These suppliers account for 52 per cent of our 2021 high risk procurement spend in Brazil.

Our West Musgrave assets and exploration teams worked with external experts to develop supplier and partner modern slavery risk screening tools. These tools will help further engage our suppliers and partners in emerging markets and will be implemented in early 2022.

We reviewed and updated our incident response plan to ensure modern slavery incident responses reflect the UN Guiding Principles on Business and Human Rights and to specifically consider the 'cause contribute, directly-linked' framework and centre victims in our response process.

More details of actions undertaken in 2021 are included under Criteria 4 (p. 23).

## Our plans for 2022

In 2022 we will implement priority actions documented in our Modern Slavery Strategic Plan and continue to raise awareness about modern slavery risks among key internal stakeholders, including our Board, executive, employees and contractors. We will enhance internal capacity and monitor and update internal awareness and education programs.

The Modern Slavery Stakeholder Team will work with key stakeholders to continuously improve and update standards, policies, procedures, and contract clauses as our risk understanding matures. We will develop guidance materials to ensure our policies and other documents are effectively implemented across all assets.

In 2022 we will extend our supplier due diligence program to ensure corrective action plans developed in 2021 are implemented and reviewed and we will survey additional high-risk suppliers. We will develop a modern slavery supplier engagement strategy to help us communicate and engage more effectively with our Tier 1 (direct) and Tier 2 (indirect) suppliers to assess and address modern slavery risks locally and internationally.

We will work with external consultants to prepare asset-specific human rights risk assessment templates so we can capture and address broader human rights risks as required under our corporate human rights standard.

We will continue to monitor the effectiveness of critical controls to manage modern slavery and other human rights risks across our operations and supply chain.

## Our plans beyond 2022

Beyond 2022, we will review, extend, evaluate, and improve our modern slavery risk management program. Our priorities will be to:

- ✓ establish performance metrics and evaluation criteria for our suppliers
- ✓ continue to develop and review corrective action plans with identified high risk Tier 1 (direct) suppliers
- ✓ undertake mapping of our extended supply chain where possible
- ✓ review worker voice data collection opportunities for identified at-risk workers.

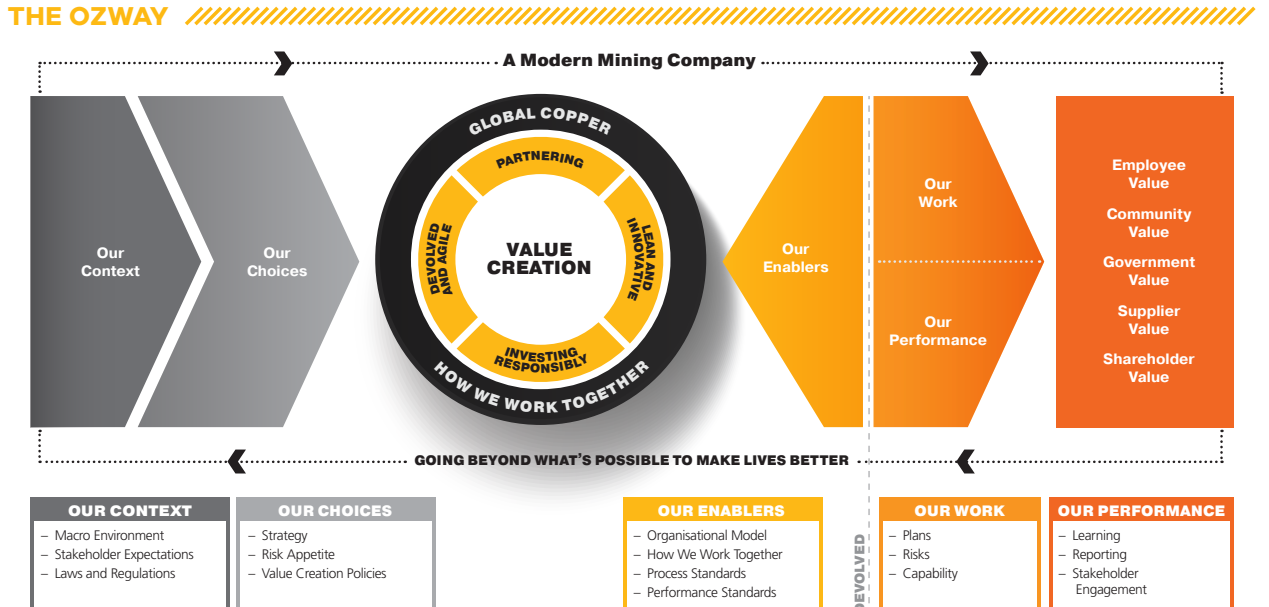
# Reporting criteria 1 and 2

## Our organisational structure

**Our devolved model has a structure of corporate functions and assets, which are further organised into various departments based on the work we do. Our corporate functions perform activities related to key business process and/or strategy elements and are the default service providers to other corporate functions globally. Our assets are the sites within a specific geographical area (e.g. Carrapateena).**

Under our devolved model, our corporate functions and assets are empowered to make timely, value-creating decisions within our risk appetite and this is reflected in the delegated authorities written into our Global Process Standards. Known as the OZWay, it is a simple model that explains how all the parts of OZ Minerals fit together. The OZWay allows the corporate functions to govern, innovate, grow the company and manage our stakeholder relationships, whilst the assets focus on what they do best— maximise the value of their business.

The How We Work Together (HWWT) principles underpin The OZWay. The HWWT principles outline a set of behaviours that OZ Minerals employees must display, which in turn creates OZ Minerals’ unique culture.



## Our Board and management structure

**Our management structure provides clear accountabilities, lean business processes and focused reporting to enable our activities to be carried out in accordance with our risk appetite and strategy and are conducted in an integrated financially, environmentally and socially responsible way.**

Our Board oversees the management of the company. Our Board has adopted a Board charter that sets out its roles and responsibilities, including setting the company's goals and objectives, reviewing and monitoring the company's material risks and its system of internal compliance and controls, setting an appropriate corporate governance framework, and determining broad policy issues for the company. Our Board also ensures that specific authority and responsibilities have been delegated to the company's CEO and that the overall strategy is aimed at delivering value for our five stakeholder groups – employees, communities, governments, suppliers and shareholders.

Our Board currently comprises seven directors – one executive director and six non-executive directors. The executive director is Managing Director and Chief Executive Officer, Andrew Cole. Our Board has a unitary structure.

All non-executive directors, including the Chairman, are independent. During the year our Non-executive Director female participation increased from 40% to 50% with effect from Sarah Ryan's appointment in May 2021.

Three standing committees assist our Board discharge its responsibilities:

### **Audit Committee**

Assists our Board with financial reporting and disclosure processes, internal financial controls, funding, financial risk management, and oversight of the internal control and risk management system's effectiveness.

### **People & Remuneration Committee**

Assists our Board with the remuneration of directors, executives and employees, succession planning, establishing and monitoring of the Employee Value Creation Policy, and overseeing risks and activities relating to people performance management, company culture, succession planning, capacity and capability, and diversity and inclusion.

### **Sustainability Committee**

Assists our Board with safety, health, environment and community (SHE&C) matters including climate change, human rights and cultural heritage, reporting and monitoring risks and activities relating to SHE&C and its requirements for internal notification, investigation, reporting and continuous improvement.

## OZ Minerals' management team

Management is responsible for implementing management systems across the business.

They are also responsible for assuring the application and effectiveness of these systems through OZ Minerals' four lines of defence Audit and Assurance Governance Framework. Training and competency are part of the continuous improvement process and are detailed in the Performance Standards.

### BOARD OF DIRECTORS

<b>Rebecca McGrath</b> Chairman and Independent Non-executive Director	<b>Andrew Cole</b> Managing Director and Chief Executive Officer	<b>Charles Sartain</b> Independent Non-executive Director	
<b>Peter Wasow</b> Independent Non-executive Director	<b>Tonianne Dwyer</b> Independent Non-executive Director	<b>Richard Seville</b> Independent Non-executive Director	<b>Sarah Ryan</b> Independent Non-executive Director

### BOARD COMMITTEES

<b>Audit Committee</b>	<b>People &amp; Remuneration Committee</b>	<b>Sustainability Committee</b>
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### EXECUTIVE LEADERSHIP TEAM

<b>Andrew Cole</b> Managing Director and Chief Executive Officer	<b>Warrick Ranson</b> Finance and Governance Executive	<b>Mark Irwin</b> Projects Executive	<b>Kerrina Chadwick</b> Corporate Affairs Executive	<b>Matt Reed</b> Operations Executive
<b>Fiona Blakely</b> People Executive	<b>Claire Parkinson</b> Integration Executive	<b>Bryan Quinn</b> Strategy and Growth Executive (commencing April 2022)	<b>Michelle Ash</b> Technology Executive (commencing March 2022)	

### ASSET AND CORPORATE FUNCTION LEADS

### EMPLOYEES

## Our governance framework

Governance is more than compliance. It's essential for our sustainability, to meet the interests and expectations of stakeholders, and to foster effective and responsible decision making. Our governance framework, supported by a healthy corporate culture, helps us to deliver our strategy, control risks and assure compliance. We are committed to doing business with high corporate governance standards and creating and delivering value across our five stakeholder groups—employees, communities, governments, suppliers and shareholders.

The OZWay is the governance framework for OZ Minerals. We have a suite of global performance standards, process standards and specifications that set the minimum mandatory requirements and outline the authority delegated to different roles across the company.

Our code of conduct outlines what is expected of everyone who works for OZ Minerals. It is designed to ensure that everything we do creates value for our stakeholders and that business is conducted with honesty and integrity.

Within this framework, our risk process standard and our global performance standards primarily define the corporate and asset-level accountabilities to identify, assess, address and review modern slavery risks within OZ Minerals and our upstream and downstream supply chains.

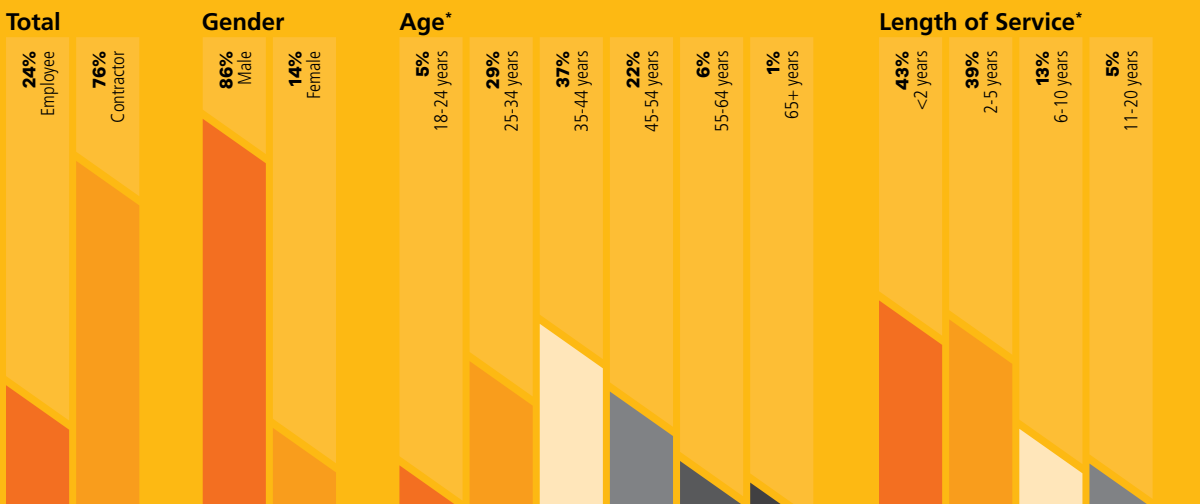
The OZ Minerals governance system is anchored by risk management. We assess the impacts on each of our stakeholder groups and structure the risk system around them. The procurement activities of our assets and functions need risk assessments against the interests of our various stakeholder groups. Regular governance system reviews make sure that our processes and global performance standards and specifications reflect changing regulatory requirements and societal expectations.

More information on our governance framework can be found in our [2021 Corporate Governance Statement](#).

## Our people

Our workforce consists of 1,147 employees, with most workers based in Australia and Brazil. 79 per cent of our employees are men and 21 per cent are women. Our contingent workforce of 3,586 people are also afforded the same protection as our workforce. Amongst our contingent workforces, we have 88 per cent men and 12 per cent women.

### GLOBAL EMPLOYEE BASE



\* Data available for employees only.



## Our operations

### AUSTRALIA

OZ Minerals owns and operates the copper–gold mines at Prominent Hill and Carrapateena in South Australia. It also owns the West Musgrave copper–nickel project in Western Australia, which is in the final study phase.

### BRAZIL

OZ Minerals owns and operates the Carajás East Hub, which includes the satellite Antas and Pedra Branca copper–gold mines in the state of Pará. More information on how we assess and address risks in Brazil is included under Criteria 3 (p. 18).

### EXPLORATION

OZ Minerals has a pipeline of earn-in agreements with experienced exploration companies in Australia and internationally, including Brazil, Peru and Sweden.

### CASE STUDY 1: ASSESSING UPSTREAM RISK

**Our upstream risk project focuses on moving from managing modern slavery risk within existing operational assets and supply chains to proactively assessing risk at the earliest stages of an asset’s life.**

The project currently focuses on the West Musgrave Project (WMP) and exploration teams operating across Australia, Latin America and Europe.

The WMP, located in the Musgrave Province of Western Australia, is in the final study phase and will commence the development phase once all regulatory approvals are received. We are trialling a supplier risk assessment questionnaire and associated assessment matrix for major construction and mining service package tenders which are expected to come online in 2022. The assessment matrix will help package managers to systematically gather information from suppliers on the measures they’re taking to manage modern slavery risks in their operations and supply chain.

We acknowledge that our exploration teams may encounter modern slavery issues when engaging with in-country partners and local communities. We are developing risk questionnaires to help managers identify the risks associated with a country, region or individual project and learn how to work with local stakeholders to address any issues. The questionnaires will enhance existing questions regarding potential human rights impacts in our SHEC assessment processes.

We will support the questionnaire rollout with staff awareness training on key modern slavery issues, such as the use of migrant labour, ethnic groups, or child labour by in-country suppliers or exploration partners.

## COMPANY SNAPSHOT

### Why OZ Minerals

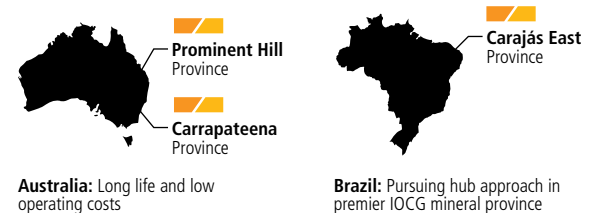
Purpose-driven organisation creating value for stakeholders enabled by company culture

Copper-focused, long life, low operating cost assets

Organic pipeline offers long-term growth potential

Development execution, consistent operational performance, balance sheet and management team

### Operations



### Organic Growth Pipeline



### Global Exploration – 18 Projects

Australia    Brazil    Sweden    Peru

## Our supply chain

The mining industry has complex supply chains. Our supply chain activities have a global reach and cover the entire life cycle of the mine, from exploration through to post-closure. Our activities include procuring goods (e.g. equipment and bulk commodities), operational and technical services (e.g. transportation and logistics), and administrative and support activities.

### HOW MUCH WE SPEND

In 2021, we spent about \$1.4 billion on goods and services globally, with close to 1,600 direct suppliers, to support our Australian and Brazilian assets, offices and exploration teams. Our global supply chain is summarised below, including the percentage of total global spend, number of suppliers and major goods and services procured in each country.

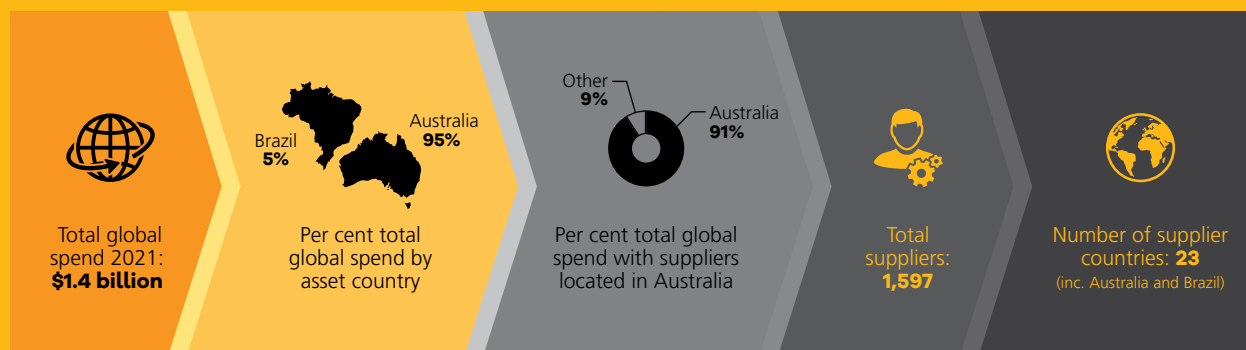
95 per cent of our total global spend supports our Australian assets, while 5 per cent supports our Brazilian assets.

We have a long-standing policy to work with local suppliers so that our procurement spend supports local businesses, creates good jobs and encourages community development opportunities where we operate. Whilst 91 per cent of our total global spend is with Tier 1 (direct) suppliers based in Australia, we acknowledge that these suppliers may source goods and services from countries with a higher risk of modern slavery and so we may hold significant modern slavery risk in our Tier 2 (indirect) supply chain.

### WHAT WE BUY

We buy across more than twenty major categories of goods and services to support our Australian and Brazilian assets.

### GLOBAL SUPPLY CHAIN



### MAJOR CATEGORIES OF GOODS AND SERVICES

(93% of total global spend)

 Mining, engineering and construction services	 Professional services and consulting	 Utilities	 Engineering materials, parts and consumables
 Plant and equipment (P&E), components and accessories	 Fuel, oil and lubricants	 Building and construction materials	 Food and camp supplies and services
 ICT and electronic equipment, components and supplies	 ICT software and network support services	 Labour hire and recruitment	 Property management services

### WHERE WE BUY IT

Our supply chain map shows our supplier locations, numbers, spend per country and goods and services procured. The map also indicates the risk of modern slavery in each country based on the SD Strategies country risk rating tool.

We spend about 91 per cent of our total global spend with Australian suppliers. We spend approximately 4 per cent of our total global spend with Tier 1 (direct) suppliers in countries where we do not operate: Bermuda, Bulgaria, Canada, China, Denmark, Germany, Great Britain, Hong Kong (POC), Israel, Italy, Jamaica, Netherlands, New Zealand, Peru, Philippines, Singapore, South Africa, Sweden, Switzerland, Taiwan and the United States.

The supply chain map highlights countries where we spent more than \$50,000. We spent between \$2,000 and \$49,000 in countries not listed on the map: Bermuda, Bulgaria, Israel, Italy, Jamaica, New Zealand, Philippines, Switzerland and Taiwan.

**Denmark**

Supplier(s)	% Total Spend
1	<1%
/ICT software and network services	

**Great Britain**

Supplier(s)	% Total Spend
16	<1%
/Professional services and consulting	
/ICT software and network services	
/Mining and construction services	

### SUPPLY CHAIN MAP

**Canada**

Supplier(s)	% Total Spend
24	<1%
/Warehouse and logistics services	
/Professional services and consulting	
/ICT and electronic equipment, components and supplies	
/ICT software and network services	
/Clothing / PPE / Other safety equipment	
/Building and construction materials	

**United States**

Supplier(s)	% Total Spend
31	<1%
/Professional services and consulting	
/ICT and electronic equipment, components and supplies	
/ICT software and network services	
/Clothing / PPE / Other safety equipment	
/Building and construction materials	
/Engineering materials, parts and consumables	
/Corporate finance, fees and services	
/Mining and construction services	

**Brazil**

Supplier(s)	% Total Spend
504	3%
/Mining and construction services	
/Utilities*	
/ICT and electronic equipment, components and supplies	
/ICT software and network services	
/Engineering materials, parts and consumables	
/Property management services	
/P&E leasing and hire	
/P&E, components and accessories	
/Fuel, oil and lubricants	
/Building and construction materials	
/Recruitment fees and services	

**Netherlands**

Supplier(s)	% Total Spend
6	<1%
/Engineering materials, parts and consumables	
/Warehouse and logistics services	
/Professional services and consulting	
/ICT software and network services	
/P&E, components and accessories	

**Peru**

Supplier(s)	% Total Spend
9	<1%
/Professional services and consulting	
/Mining and construction services	

**South Africa**

Supplier(s)	% Total Spend
2	<1%
/Professional services and co	

### Modern Slavery Country Risk Rating



Represents 99% of our Total Global Spend with Tier 1 suppliers where total country spend is greater than \$50,000

\* Top ten goods and service categories by spend only



# Reporting criteria 3: Modern slavery risks in operations and supply chain

## Overview

**In 2021, we set out to better understand modern slavery risks in our operations and supply chains and focus our due diligence efforts on our highest risk suppliers (Tier 1) across Australia and Brazil.**

### IDENTIFYING OPERATIONAL RISK

With the support of external experts, we undertook modern slavery gap analysis workshops with all assets, including corporate and exploration, Prominent Hill, Carrapateena, West Musgrave and Brazil.

The workshops were designed to:

- ✓ engage and educate our workforce
- ✓ identify gaps in our systems and processes that could increase our exposure to modern slavery risks in our operations and supply chains
- ✓ identify opportunities to improve and enhance our systems and processes
- ✓ inform the development of our modern slavery risk management program.

### IDENTIFYING SUPPLY CHAIN RISK

In 2021 we focused on mapping our global supply chain and obtaining a deeper understanding of modern slavery risks associated with our Tier 1 suppliers and the operational processes they have in place to manage those risks.

We engaged external experts to help us document, assess and prioritise our Tier 1 suppliers against four internationally-recognised modern slavery risk indicators:

- ✓ geography, or the country of origin of the good or service
- ✓ industry sector associated with its manufacture or delivery
- ✓ commodity or raw material used in the goods
- ✓ workforce risk, such as women, girls, child labour, migrants etc.

This enabled us to:

- ✓ identify our highest risk procurement categories
- ✓ develop customised supply chain risk profiles for our Brazilian operations and each of our devolved assets in Australia
- ✓ prioritise our supplier engagement processes.

We conducted a supplier risk review of 31 potentially high-risk Australian suppliers and four Brazilian suppliers. These were classed as high priority suppliers because they have received close to 60 per cent and 52 per cent of our potentially high risk spend and operate in higher risk industry sectors, respectively. This is an ongoing process and we will undertake further due diligence of priority suppliers in 2022.



# Operational risks

## MODERN SLAVERY GAP ANALYSES

The Modern Slavery Stakeholder Team, along with representatives from each asset, undertook gap analyses to identify areas of improvement across five key categories:

- / management systems
- / human resources and recruitment
- / procurement and supply chain
- / risk management
- / customers and stakeholders.

The five separate analyses identified gaps and opportunities to better manage our response to modern slavery risks across our Australian and Brazilian assets. We are making steady progress in our modern slavery risk management journey and recognise that there is much work to do. Our work this year has enabled us to better understand the essential elements of effective modern slavery risk management programs within our assets and expand our corporate governance and risk management frameworks to better capture and respond to these risks.

## ROADMAP

The gap analysis helped us develop the company-wide Modern Slavery Strategic Plan and roadmap in collaboration with key organisation representatives. The strategic plan includes five high level goals which build on initiatives started in 2020 and further defines activities, actions, responsibilities, and timeframes. Our five goals are to:

- (1) establish a company-wide governance structure and due diligence process to manage modern slavery risks
- (2) implement a supplier/contractor due diligence program
- (3) enhance internal awareness of modern slavery
- (4) implement effective feedback mechanisms and modern slavery incident response and remediation strategies
- (5) engage our communities and external stakeholders on modern slavery risk management.

The three-year road map has established a clear pathway for us to follow. Elements of the strategic plan and roadmap are included in Criteria 4 (p. 23).

## GAP ANALYSIS ON MODERN SLAVERY PROGRESS ACROSS ALL ASSETS

	Corporate and exploration	Carrapateena	Prominent Hill	West Musgrave	Brazil
<b>Management systems</b>					
Governance	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
Commitment	Starting out	Starting out	Starting out	Starting out	Starting out
Business systems	Starting out	Starting out	Starting out	Starting out	Starting out
Action	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
Monitoring	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
<b>Risk management</b>					
Framework	Starting out	Starting out	Starting out	Starting out	Starting out
Operational	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
External	Starting out	Starting out	Starting out	Starting out	Starting out
Monitoring	Starting out	Starting out	Starting out	Starting out	Starting out
<b>Supply chain</b>					
Policies	Starting out	Starting out	Starting out	Starting out	Starting out
Contract management	Starting out	Starting out	Starting out	Starting out	Starting out
Screening	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
Engagement	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
Corrective Action Plans	Starting out	Starting out	Starting out	Starting out	Starting out
<b>Human resources</b>					
Awareness	Starting out	Starting out	Starting out	Starting out	Starting out
Policies	Starting out	Starting out	Starting out	Starting out	Starting out
Training	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
Screening of labour hire companies	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
<b>Customers and stakeholders</b>					
Attitude	Starting out	Starting out	Starting out	Starting out	Starting out
Information	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line
Feedback	Starting out	Starting out	Starting out	Starting out	Starting out
Worker voice	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line

At the starting line   Starting out   Making progress

# Supply chain risks

## HIGH LEVEL FINDINGS

- ✓ Approximately three-quarters of our procurement spend has the potential to support modern slavery.
- ✓ Our five highest risk goods and services categories by spend are:
  - › mining, engineering and construction services
  - › engineering materials, parts and consumables
  - › plant and equipment, components and accessories
  - › fuel, oil and lubricants
  - › camp supplies and services.
- ✓ Our main source of risk is purchasing goods and services manufactured or located in countries ranked as high risk for modern slavery.
- ✓ Levels of potential risk vary significantly between our assets.

## SUPPLY CHAIN OVERVIEW

Procurement teams within our assets were supported by external experts to analyse \$1.4 billion of procurement data for potential modern slavery risk.

The data was analysed against four internationally recognised risk indicators:

- ✓ **Geographic location** – based on estimated in-country prevalence of modern slavery determined by a custom risk index developed by the external experts engaged to support our program. While we predominantly use Australian suppliers, we recognise that they may source goods and services from countries that may have an elevated risk of poor labour standards and modern slavery.
- ✓ **Industry sector** – specific industry sectors (e.g. manufacturing, ICT, construction) are considered to be high risk in international and national guidance documentation.
- ✓ **Commodity/product** – specific products and commodities are deemed as high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- ✓ **Workforce profile** – we considered the type of labour involved in the production of our goods and services, mainly where child, low skilled, vulnerable, or migrant labour is used, or where the work is deemed as ‘4D’ work (dirty, dull, degrading or dangerous).

*Important note:* Our focus in 2021 has been on better understanding and quantifying risks posed by higher spend Tier 1 (direct) suppliers. We recognise that there may be risk amongst our lower spend Tier 1 (direct) suppliers not captured by our due diligence program and in our extended Tier 2 (indirect) supply chain. These important considerations will be addressed in future risk assessments.

## RISK BY TOTAL GLOBAL SPEND

### Total spend and segmentation

	50% of spend	80% of spend	Total
<b>Percent Total Spend</b>			
Suppliers	9	67	1,597
Spend (\$m)	704	1,127	1,407
<b>Percent High Risk Spend</b>			
Suppliers	7	52	740
Spend (\$m)	594	907	1,063

### Risk assessment

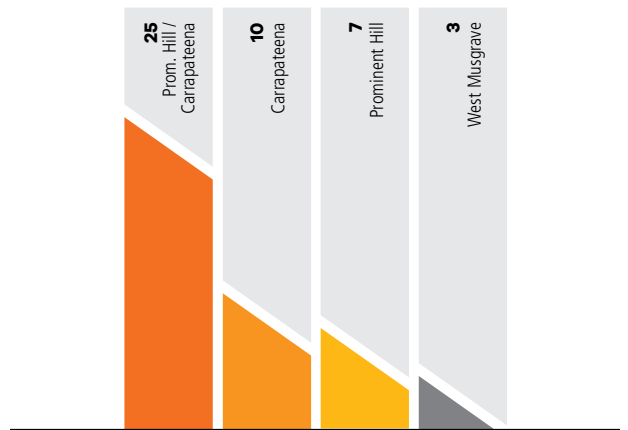
The analysis identified that three-quarters or 75 per cent of our total global spend may be at high risk of supporting modern slavery. This is largely due to our significant spend on potentially high-risk goods and services such as mining, engineering and construction, fuel, and plant and equipment.

A further 14 per cent medium of our global spend was categorised as a medium risk and 11 per cent as lower risk.



### Shared suppliers

Analysis of the top 80 per cent of spend for our global high risk suppliers (52 suppliers) found over half of these suppliers (25 suppliers) are shared by Carrapateena and Prominent Hill. Ten are used only by Carrapateena, seven are used only by Prominent Hill, and three only by West Musgrave.

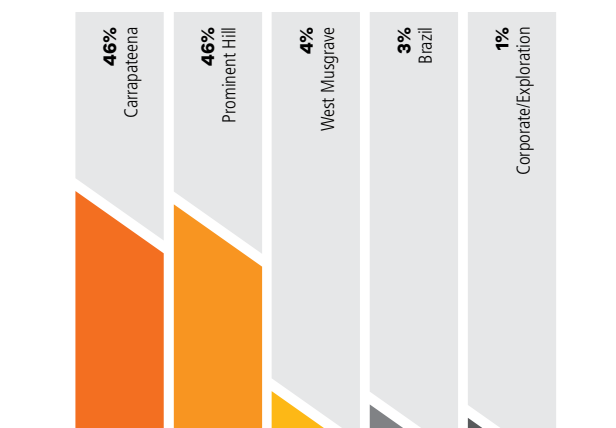


## SUPPLY CHAIN OVERVIEW

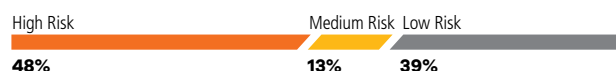


### Risk by asset

Carrapateena and Prominent Hill make up over 90 per cent of OZ Minerals' global high risk spend.



### RISK BY SUPPLIERS



Just under one-half of the companies that supply our Australian and Brazilian assets are at high risk of supporting modern slavery.

Whilst most of our direct suppliers based in Australia represent a lower risk, the goods and services they supply are sourced from countries with a higher risk for modern slavery. Our spend with Tier 1 (direct) suppliers located in higher-risk countries such as Brazil, China and South Africa is relatively low.

We will continue to gather data on the provenance of raw materials used to make the goods we procure, particularly those at our Brazilian asset. This will enable us to better understand the risks in our extended supply chain, prioritise the engagement of high-risk suppliers, and take appropriate action to manage it.

Brazil was identified as a low-risk country for modern slavery in our 2020 statement, based on the 2018 Global Slavery Index. A subsequent review that used a more comprehensive country risk rating tool re-rated Brazil's risk as moderate to high. The review used 13 indices, including the GSI vulnerability score and the GSI government response rating. Other indices included public expenditure on social protection, immigrant population, the rule of law index, and the corruption perceptions index. We have started to work closely with our Brazilian asset and suppliers at greatest risk of modern slavery to conduct comprehensive due diligence on the systems and processes they have in place to manage these risks.

### CASE STUDY 2: ASSESSING RISK IN OUR GLOBAL OPERATIONS

We recognise the potential risk of modern slavery across our global operations and associated supply chains and partnerships, primarily in South America. We have three assets in Brazil: Carajás West, Carajás East, and Gurupi. We also have several upstream exploration projects in Brazil, Peru and northern Europe.

In 2021, we identified four local suppliers who accounted for 60 per cent of our potentially high-risk spend in Brazil. These suppliers were invited to undertake a 'deep dive' modern slavery self-assessment questionnaire (SAQ), identical to those undertaken by Australian suppliers. The SAQ was designed to identify potential areas of modern slavery and human rights risk in their operations and supply chains, their capacity to manage that risk, and the action they're taking to minimise it. OZ Minerals' Australian and Brazilian use Modern Slavery Stakeholder Teams collaborated to translate the SAQ, guidance materials, and online supplier risk assessment portal into Portuguese. They also worked with our priority Brazilian-based suppliers to make sure they participated in the risk assessment process.

The initial SAQ assessment found that:

- ✓ mining and construction services, camp accommodation services, labour-hire and fuel were the main high-risk goods and services provided by suppliers
- ✓ most suppliers have human rights, labour relations and ethical supply chain management policies in place but there is little evidence of communication or enforcement
- ✓ managers in all companies had medium to high levels of awareness of modern slavery risk
- ✓ suppliers consider their operations and supply chains to hold a low risk of modern slavery, but formal risk assessments have been limited.

Suppliers acted in varying ways to mitigate their risk. Some suppliers conducted high-level modern slavery risk assessments of their direct suppliers, while others incorporated anti-slavery clauses into supply contracts, developed codes of conduct, and trained staff.

The SAQ findings will further inform and focus our supplier due diligence initiatives. Individual risk-based reports and customised corrective action plans (CAPs) will be provided to each supplier in early 2022.

Our supplier relationship managers will work with suppliers to make sure that any corrective actions are taken in a timeframe acceptable to both parties.

### RISK BY CATEGORY



Over two-thirds of the goods and services we procure from our Tier 1 (direct) suppliers are deemed potentially high risk for modern slavery.

Our highest risk categories by overall spend include:

- / mining, engineering, and construction services
- / engineering materials, parts and consumables
- / plant and equipment, components and accessories
- / fuel, oil and lubricants
- / camp supplies and services.

These five categories account for 90 per cent of our high-risk spend. The higher levels of risk are due to the industry sectors involved, including manufacturing, refining, accommodation, and commodities such as steel, electronic components and food.

### RISK BY ASSET

By spend, the potential risk levels in Australia were slightly higher than in Brazil (74 per cent and 67 per cent respectively). Mining, engineering, and construction services was the largest potentially high-risk spend category in both countries.

Analysis of potential supply chain risk in Australian assets found higher risk levels in mature operations (Carrapateena and Prominent Hill) compared to corporate and the West Musgrave Project (WMP). These risk profiles differ because operational assets have a greater spend and a more expansive supply chain compared to corporate and WMP, which is at final study phase. We acknowledge that WMP's modern slavery risk will increase should the project move into its operational phase and we are proactively managing and mitigating potential risks (see Case study 1, p. 14).

# Reporting criteria 4: Actions taken to assess and address risk

The following actions were completed in this reporting period.

## MODERN SLAVERY STAKEHOLDER TEAM

We formalised our Modern Slavery Stakeholder Team which includes representatives from across our assets and is guided by the Head of Legal. The stakeholder team continues to lead our modern slavery risk management program and implement our strategic plan and road map.

## WORKFORCE AWARENESS SURVEY

We ran a baseline awareness survey of our workforce at the start of the 2021 modern slavery risk management program to determine how modern slavery is understood across our business. 135 people completed the survey and the results indicated that while 87 per cent of participants understood there was a risk of modern slavery in our supply chain and consider the issue highly relevant to OZ Minerals, most did not understand the extent of the issue in Australia and globally. Close to three-quarters of participants did not know what steps to take if they suspected instances of modern slavery. The results of this baseline survey will continue to inform our modern slavery awareness and training programs and enable us to measure the effectiveness of these programs (Case study 3).

## TRAINING

We train employees to make sure they understand the risks of modern slavery in our supply chains and our business. Awareness-raising is crucial to help prevent and address modern slavery.

Our global performance standards require all assets to raise awareness of human rights among their employees, contractors and visitors as appropriate to the local context. Our online human rights training, which includes guidance around forced labour, has been mandatory for all employees in OZ Minerals since 2020. It explains that our most prominent human rights risks involve labour rights. As of December 2021, 85 per cent of all employees had completed the training. We will continue to support our employees and suppliers to undertake this training and meet our global performance standards.

## CASE STUDY 3: ENGAGING AND EDUCATING OUR STAFF ON MODERN SLAVERY

Engaging and educating our people is an important component of our Modern Slavery Strategic Plan and risk management approach. In 2021 we raised awareness of the issue to lift its profile and draw attention to its relevance to OZ Minerals. We surveyed our workforce to assess current modern slavery awareness levels and inform content and delivery options for our workforce engagement and awareness program.

Key elements of our internal awareness program included:

- ✓ delivering modern slavery workshops to all assets
- ✓ weekly meetings with our Modern Slavery Stakeholder Team to track progress and inform next steps
- ✓ briefing sessions with the Board and ELT on the implications of modern slavery to our business and the potential risks in our supply chain
- ✓ providing modern slavery information and infographics in English and Portuguese on Yammer.

In 2022, we will expand our initial engagement and awareness initiatives and implement a more comprehensive professional development program, including eLearning modules for employees on how to manage modern slavery risk.



### MODERN SLAVERY GAP ANALYSIS

We reviewed our systems and processes with the support of external consultants and undertook five operational gap analysis' to better identify the risks and opportunities across our assets and enhance our devolved risk management systems. The results of our gap analysis can be found under Criteria 3 (p. 18).

### ASSET MODERN SLAVERY ACTION PLANS AND GROUP MODERN SLAVERY STRATEGIC PLAN

Each asset developed a practical and comprehensive modern slavery action plan that will inform on-the-ground actions at the asset level. Recognising the significant overlap between asset-based action plans, our ELT worked together to prepare a group-wide modern slavery strategic plan that would govern the implementation of our broader company-wide program and help implement asset-based plans. Our strategic plan includes five key goals to ensure our anti-slavery program is risk-based, reflects our corporate standards and policies, aligns with global human rights and modern slavery frameworks, and meets the requirements of Commonwealth modern slavery legislation. The strategic plan informed our three-year modern slavery roadmap (p. 26).

### RISK FRAMEWORK

We reviewed and updated our corporate risk register and documented what could increase the risk of modern slavery, along with associated preventative and mitigating controls. This helped us to integrate modern slavery risk management across our operations. We identified the following potential causes of modern slavery in our operations and supply chain:

- ✓ lack of comprehensive procurement and supply chain policy or function
- ✓ limited visibility of supply chain beyond Tier 1 (direct) suppliers
- ✓ devolved structure with limited information or resource sharing
- ✓ operation in potentially high-risk jurisdictions
- ✓ inadequate supplier vetting and engagement process of Tier 1 (direct) suppliers
- ✓ reduced supplier visibility in extended or international supply chains
- ✓ sourcing high risk goods and services (mining services, fuel, building and construction, plant and equipment, chemicals and explosives)
- ✓ sourcing goods and services from high-risk countries (Peru, China, South Africa, Brazil, Philippines, Bulgaria, Jamaica, Israel)
- ✓ purchase order transactions (limited relationships or understanding of vendors)
- ✓ use of local and community labour by exploration partners.

We continue to work on implementing preventative controls and this is reflected in our asset modern slavery action plans and our group modern slavery strategy. Mitigating controls include reviewing and updating our incident management framework, Speak Up hotline and documented remedy pathway.

## SUPPLIER RISK IDENTIFICATION, PRIORITISATION AND DUE DILIGENCE

We reviewed and prioritised our highest spend suppliers against modern slavery risk indicators and identified five high-risk procurement categories (Criteria 3, p. 18). We invited our 31 highest priority Australian suppliers (covering 60 per cent of our high-risk procurement spend) and four priority Brazilian suppliers (covering 52 per cent of our high risk spend) to participate in a self-assessment modern slavery questionnaire (Case study 4). Working closely with external consultants, we engaged and educated each supplier, not only on what we wanted them to do, but why we wished to partner with them to assess and address our supply chains risks.

## INCIDENT RESPONSE PLAN AND REMEDY FRAMEWORK

Responding to a modern slavery incident requires a nuanced approach and so we developed a specific modern slavery incident response plan. This places the victims of modern slavery at the forefront of decision making. The plan provides our workforce with clear instruction on how to assess, escalate and manage reports of incidents where there is a suspicion of modern slavery in our supply chains, operations and business activity (Case study 5, p. 26).

## UPSTREAM RISK MANAGEMENT PROCESSES

Upstream projects include the WMP (at final study phase) as well as our exploration teams operating in Australia, Latin America (Peru) and Europe (Sweden). We have an opportunity to proactively manage modern slavery risks at the earliest stages of asset lifecycles and so we are trialling a supplier risk assessment questionnaire and assessment matrix in upcoming tenders for WMP major construction packages.

We are developing a similar risk questionnaire for our exploration teams to use as they engage in-country partners and local communities. This will be incorporated into our Safety, Health, Environment, Community (SHEC) assessment processes (see Case study 1, p. 14).

## CASE STUDY 4: ENGAGING OUR HIGHEST PRIORITY SUPPLIERS

We invited 31 of our highest priority Australian suppliers and four priority Brazilian suppliers (who collectively account for over 60 per cent of our high-risk procurement spend) to participate in a modern slavery self-assessment questionnaire. We worked closely with external consultants to engage and educate each supplier, not only on what we wanted them to do, but on why we wished to partner with them to assess and address our supply chains risks. Suppliers were provided with access to a supplier portal which included an information video, FAQs and a guideline to help them understand the intent of each survey question and the supporting information required. The supplier portal was translated into Portuguese for our Brazilian suppliers.

75 per cent of our suppliers completed the questionnaire by end November 2021. A mix of goods and services were procured from the suppliers surveyed, including:

- / mining, building and construction services
- / plant and equipment
- / camp services
- / transport, warehousing and logistics

Suppliers were assessed across three key areas:

- / operations, workforce and remedy
- / governance and due diligence
- / risk management.

They were given an effectiveness ranking for each category and given an overall risk ranking. Lack of evidence and supporting documentation resulted in lower effectiveness scores and a higher overall risk ranking.

60 per cent of respondents indicated that modern slavery had little relevance to their organisation. This could reflect an incorrect assumption that modern slavery does not exist in Australia or in the supply chains of Australian companies that they procure goods and services from (Tier 2 (indirect) suppliers).

The lowest effectiveness ratings were in the risk management category, with nearly 60 per cent of participating suppliers ranked as 'ineffective'. 45 per cent were ranked as ineffective in the governance and due diligence category. This is despite several respondents being reporting entities under the *Modern Slavery Act*. These results reflect a lack of modern slavery due diligence processes and a limited number of operational/supply chain risk assessments. Despite not having undertaken formal risk assessments, many of our suppliers believed that they did not procure from high-risk suppliers and that they themselves present a low risk for modern slavery.

More work is needed to engage and educate our suppliers on the risks of modern slavery and the potential vulnerabilities in their operations and supply chains.

Each supplier will be provided with a comprehensive risk-based report and recommendations for improvement. Our asset teams will continue to work with suppliers to develop and implement corrective action plans based on these recommendations.

**MODERN SLAVERY ROADMAP**

This year we reviewed our existing systems and processes for managing operational and supply chain modern slavery risks to determine our highest risk/highest priority suppliers and build a modern slavery risk management framework. In 2022 we will implement additional priority actions and enhance our due diligence processes for our priority national and international suppliers. In the third year of the road map, we will monitor and review our progress as part of our commitment to continual improvement.

**THREE-YEAR MODERN SLAVERY ROADMAP** 

<p><b>2021</b> <b>Formalise framework and clarify risk</b></p> <ul style="list-style-type: none"> <li>/ Formalised Modern Slavery Stakeholder Team with representatives from all assets</li> <li>/ Developed asset modern slavery action plans and Group Modern slavery Strategy</li> <li>/ Developed three-year modern slavery roadmap</li> <li>/ Developed and delivered staff awareness survey</li> <li>/ Engaged and educated ELT and Board</li> <li>/ Increased broad awareness of modern slavery among staff</li> <li>/ Prioritised supplier risk</li> <li>/ Engaged with the highest risk Australian suppliers and invited 31 suppliers (60% high risk spend) to complete modern slavery self-assessment questionnaire</li> <li>/ Engaged with the highest risk Brazil suppliers and invited four suppliers (52% high risk spend) to complete modern slavery SAQ</li> <li>/ Reviewed and updated risk register to include modern slavery risk</li> <li>/ Developed modern slavery incident response plan and remedy framework</li> <li>/ Developed modern slavery questionnaire for upstream suppliers.</li> </ul>	<p><b>2022</b> <b>Expand due diligence program</b></p> <ul style="list-style-type: none"> <li>/ Follow up supplier questionnaires with corrective action plans</li> <li>/ Conduct further supplier due diligence of highest risk, highest priority suppliers in all assets</li> <li>/ Communicate OZ Minerals modern slavery position to all suppliers</li> <li>/ Include KPIs and evaluation measures for suppliers in structured SRM program</li> <li>/ Develop resources to help implement the anti-slavery program (and existing standards)</li> <li>/ Ensure human rights management plans are developed and implemented across all assets</li> <li>/ Review effectiveness of existing training and develop eLearning modules for in-house learning management system</li> <li>/ Develop modern slavery training for external contractors</li> <li>/ Monitor the effectiveness of actions to resolve reported instances of modern slavery</li> <li>/ Develop targeted information for key stakeholders and integrate modern slavery information into existing stakeholder forums.</li> </ul>	<p><b>2023</b> <b>Review, extend, evaluate and improve</b></p> <ul style="list-style-type: none"> <li>/ Extend supplier risk assessments to highest risk Tier 2 (indirect) suppliers where possible</li> <li>/ Conduct ongoing assessment of internal and external stakeholder awareness</li> <li>/ Review and update action plans and strategy and strive for continuous improvement</li> <li>/ Develop comprehensive modern slavery remediation program</li> <li>/ Review worker voice data collection opportunities</li> <li>/ Continue to review and report on modern slavery risk management initiatives.</li> </ul>
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**CASE STUDY 5: REMEDY FRAMEWORK**

**We recognise that responding to a modern slavery incident requires a nuanced approach, and so we developed a specific modern slavery incident response plan that places the victims of modern slavery at the forefront of decision making.**

The plan is informed by international conventions, treaties and protocols relevant to combatting modern slavery, as well as the UN Guiding Principles on Business and Human Rights and the *Modern Slavery Act 2018 (Cth)*. It provides our workforce with

clear instructions on how to assess, escalate and manage reports of incidents where there is a suspicion of modern slavery in our supply chains, operations or business activities.

The plan describes the management structures, roles, responsibilities and procedures for responding to incidents of modern slavery where OZ Minerals either causes, contributes to, or is directly linked to the incident.

While the Modern Slavery Incident Response Plan is a stand-alone document, the overall process has been carefully integrated into the OZ Minerals incident management standard.

Training on our Modern Slavery Incident Response Plan will be rolled out to all assets in 2022.

# Reporting criteria 5: Effectiveness assessment

## **We have established a continuous improvement process to develop our internal capabilities and iteratively improve our systems and processes.**

We are implementing a review process to track our modern slavery risk management journey so we can make sure we're making tangible progress towards our goals. This review process reflects our corporate governance framework.

### **ANNUAL REVIEW – BOARD**

Our annual modern slavery statement is approved and signed off by the Board as per mandatory reporting requirements. The Board sets the company's risk appetite and oversees the management framework and effectiveness of the internal control and risk management systems. It also reviews and monitors the company's material risks. Reports to the Board on material risks include an overview of company risks, a summary of key changes to the risk profile, critical control updates, and the actions implemented to reduce the level of uncertainty and improve risk management. The Board requires the CEO and ELT to implement a system of controls to identify, assess, manage, and report risks in line with the risk management framework.

### **BOARD SUSTAINABILITY COMMITTEE**

Modern slavery risk management progress, issues and achievements are reviewed by the sustainability committee as part of the compliance update. The sustainability committee helps the Board effectively discharge its responsibilities as they relate to sustainability. These fall primarily in the areas of safety, health, environmental and community, including human rights and cultural heritage, and the oversight of risks relating to those issues.

## **STAKEHOLDER TEAM AND ELT**

Modern slavery progress is reviewed by our stakeholder team members and our ELT. The ELT is responsible for the effective implementation of the risk management framework and system of control for identifying, assessing, managing, and reporting risk across the company. The ELT reviews, and the CEO approves, the risk profile for the organisation and ensures assets and corporate functions embed risk management process and practice into everyday business systems and processes.

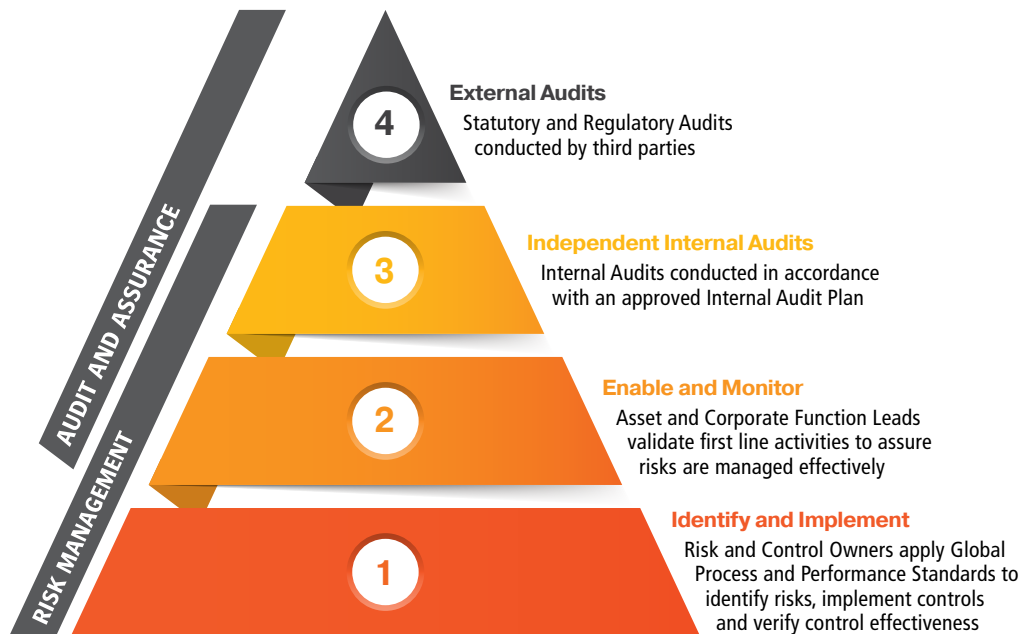
Management is responsible for making sure these systems are applied and effective through OZ Minerals' four lines of defence Audit and Assurance Governance Framework:

- (1) Identify and implement
- (2) Enable and monitor
- (3) Independent internal audits
- (4) External audits.

## **CORPORATE RISK FUNCTION**

The corporate risk function supports and coordinates implementation of the risk management framework, ensures risk management is embedded into core business processes, and builds risk management capability and a risk-aware culture across the business. The corporate risk function oversees OZ Minerals' risk management framework and develops, governs, supports, and reports on the effective implementation of risk management to the ELT, the Board, and its committees.

## OZ MINERALS OPERATES A FOUR-LEVEL LINE OF DEFENSE RISK MANAGEMENT GOVERNANCE MODEL:



### THE FIRST LINE OF DEFENCE – IDENTIFY AND IMPLEMENT

Global Process Standards define the approval escalations between the Board, CEO, Assets and Corporate Functions based on risk. The Risk Management Process Standard outlines the mandated process for escalation and the roles of organisational authority levels in risk reduction. Risk responsibility for identifying, assessing, managing, and reporting resides with all employees who are responsible for considering risks when making key decisions, implementing controls and monitoring risks during their activities.

### THE SECOND LINE OF DEFENCE – ENABLE AND MONITOR

The senior leadership of the Assets and Corporate Functions ensure compliance with the minimum controls in OZ Minerals' Global Performance and Process Standards and provide subject matter expertise and insights to support the delivery of the standards.

### THE THIRD LINE OF DEFENCE – INDEPENDENT INTERNAL AUDITS

All Global Process and Performance Standards are subject to the Audit and Assurance Process Standard, where compliance against the Standard and opportunities for improvement are monitored by the Corporate Audit Function in addition to the self-assurance activities undertaken by the Assets and Corporate Functions themselves. The Internal Audit and Assurance Function provides independent assurance over the governance, compliance and internal control system and processes across the business.

### THE FOURTH LINE OF DEFENCE – EXTERNAL AUDITS

External Audit provides an independent assurance that the internal control system is adequate, and that OZ Minerals' operations comply with the minimum requirements of relevant regulatory, legislative, and associated standards.

## Effectiveness indicators 2021

In 2021 we measured the effectiveness of our actions across risk and governance, procurement and supply chains, awareness and training, and grievance and reporting.

Focus area	Example activity	Effectiveness assessment
Risk and governance	<ul style="list-style-type: none"> <li>✓ Board and ELT engagement</li> <li>✓ Updated risk register</li> <li>✓ Developed remedy pathway</li> </ul>	<ul style="list-style-type: none"> <li>✓ Regular oversight on progress against Modern Slavery Strategic Plan by stakeholder team and legal/compliance function</li> </ul>
		<ul style="list-style-type: none"> <li>✓ Reports to executive and Board committees</li> </ul>
Procurement and supply chain	<ul style="list-style-type: none"> <li>✓ Supplier risk prioritisation</li> <li>✓ Supplier engagement and modern slavery SAQ for highest risk suppliers in Australia and Brazil</li> <li>✓ Upstream supplier and partner due diligence</li> </ul>	<ul style="list-style-type: none"> <li>✓ Update of supplier risk profile year-on-year</li> </ul>
		<ul style="list-style-type: none"> <li>✓ Building greater understanding of potential modern slavery risks in our supply chain</li> </ul>
		<ul style="list-style-type: none"> <li>✓ Percentage of supplier corrective actions effectively addressed</li> </ul>
Awareness and training	<ul style="list-style-type: none"> <li>✓ Modern slavery training needs analysis</li> <li>✓ Global human rights standard training</li> <li>✓ Awareness raising communications</li> </ul>	<ul style="list-style-type: none"> <li>✓ Percentage of workforce completing modern slavery training</li> </ul>
		<ul style="list-style-type: none"> <li>✓ Annual LMS data reviews</li> </ul>
		<ul style="list-style-type: none"> <li>✓ Increased awareness and training across workforce</li> </ul>
Grievance and reporting	<ul style="list-style-type: none"> <li>✓ Updated incident management process to include specific category for modern slavery grievances</li> <li>✓ Developed remedy pathway</li> </ul>	<ul style="list-style-type: none"> <li>✓ Review of number of issues raised and per cent issues effectively addressed</li> </ul>
		<ul style="list-style-type: none"> <li>✓ Number of suppliers and business partners aware of grievance and remedy framework</li> </ul>

## Continuous improvement

Modern slavery risk is complex and challenging to address. In 2021 we made significant progress in understanding our operational and supply chain risks, engaging our workforce, and documenting our modern slavery action plans, group strategic plan and road map.

Our Modern Slavery Stakeholder Team led by our Head of Legal and supported by our Board's sustainability committee, will strive for continuous improvement as we continue to integrate modern slavery risk management into all aspects of our operations.

We expect our approach to evolve over time as we, and the business community, learn more about the risks and impacts of modern slavery globally.

# Reporting criteria 6: Process of consultation with entities owned or controlled

**OZ Minerals consulted with the other reporting entities covered by this statement and together we consulted with the entities we own or control. For example, the procurement teams cover each of the reporting entities, as do the policies outlined in 'Actions taken to assess and address the risks of modern slavery' above.**

OZ Minerals uses a devolved model of operation where each of our assets operate independently within our governance framework. We recognise that modern slavery is an issue of significance that affects all of our assets and so we have engaged and consulted deeply across all areas of our operation (including our exploration teams).

We have particularly focused on engaging and consulting with our Brazil asset modern slavery team (recognising the potentially higher risk levels in Brazil). While every asset developed its own specific modern slavery action plan, this Statement focuses on a company-wide risk management approach that recognises corporate commitment and oversight. Through this approach, we ensure modern slavery risk management is effectively integrated into our broader risk management systems and processes and continues to be effectively assessed and addressed.

We consulted, engaged and worked closely with team members in each asset to establish our modern slavery risk management program. Weekly (and then monthly) online team meetings were held with representatives from all areas of the business to identify and prioritise our risks and management actions. We consulted with our assets to identify our potentially highest risk suppliers who will undergo further due diligence. With the support of supplier relationship managers in each asset we engaged and consulted with key suppliers to better understand their awareness and management of modern slavery risks.

We continue to consult our Brazil team to identify relevant non-government organisations and agencies in Brazil to help implement our grievance, remedy and response framework.

Our governance framework, which applies across all of our assets and activities, formed an integral part of our consultation process.

This statement was also circulated to the executive team for comment prior to being considered by the Board of OZ Minerals for review and approval.

## OUR CONTINUING RESPONSE TO COVID-19

Our devolved operating model meant our mine sites were able to rapidly respond to the changing COVID-19 restrictions throughout 2021. Exploration activities around the world were undertaken within a COVID-19-safe framework. Our Brazilian team continued to operate while managing a much higher concentration of COVID-19 cases than had occurred in Australia. Their robust processes limited cases on site to low numbers at any one time and their test, trace and isolate regimes prevented widespread infection.

During the depths of COVID-19 we established a project, Project Beyond, to ensure we emerged from the pandemic stronger and closer to achieving our strategic aspirations. Over 450 ideas were gathered from across our business which were combined with external multi-sector benchmarking. These were then refined and distilled into our acceleration priorities, which will help modernise how we work, fast-track our ethical and sustainable aspirations, and refine and prioritise the fundamentals of our business. They are short to medium-term priorities that we would have completed in the future, but we have now chosen to accelerate.

The priorities include:

- ✓ normalising and systemising flexible and remote work
- ✓ moving to the use of agile work methodologies
- ✓ removing bureaucracy so innovation can occur more freely
- ✓ accelerating the implementation of a whole-of-value chain, real-time, data-driven decision-making toolset
- ✓ greater inclusion of our external stakeholders in our design teams and decision-making processes.

We continued to engage regularly with our suppliers to understand the impact of COVID-19 on their businesses and worked with them to help where we could. For example, we supported our supply partners to meet our COVID-19 health protocols and, through our COVID-19 stakeholder support program, provided funds to build capability and resilience at local levels.



# Statement Annexure

## PRINCIPAL GOVERNING BODY APPROVAL

This modern slavery statement was approved by the principal governing body of **OZ Minerals Limited** as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act") on 18 February 2022.

## SIGNATURE OF RESPONSIBLE MEMBER

This modern slavery statement is signed by a responsible member of The Board of Directors as defined by the Act.



**Rebecca McGrath**  
Chairman  
Adelaide  
18 February 2022



**Andrew Cole**  
Managing Director and CEO  
Adelaide  
18 February 2022

## MANDATORY CRITERIA

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
(a) Identify the reporting entity	p. 02
(b) Describe the reporting entity's structure, operations and supply chains.	p. 10-17
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	p. 18-22
(d) 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.	p. 23-26
(e) Describe how the reporting entity assesses the effectiveness of these actions.	p. 27-29
(f) 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).	p. 30
(g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	p. 06-09

## **OZ MINERALS LIMITED**

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### **Corporate Office**

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