

MODERN SLAVERY STATEMENT 2024





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FOREWORD FROM CHAIRMAN

CITIC Pacific Mining (CPM) is proud to be part of Western Australia's world-leading resources sector. In 2023-24 WA resource companies injected more than \$150 billion in direct spending into the national economy.

This figure includes wages to employees, money spent with local businesses, local governments and on community initiatives and taxes and royalties paid to the State and Federal Governments. Collectively our industry supports tens of thousands of local jobs and the revenue streams to government (more than \$50 billion) enable the delivery of schools, hospitals, roads and other essential community infrastructure.

At CPM, we're an iron ore value adding operation and among the State's top exporters, across all industries. In 2024 we worked with more than a thousand vendors, the majority of whom are Australian entities.

The economic benefit of our investment in mineral extraction is just part of the story. Of equal importance is the need to operate in a sustainable and ethically responsible manner, including across our supply chains.

It's incumbent on all of us to do everything we can to ensure that the materials and services we use, whether sourced locally or from overseas, align with our company's values and community expectations.

Modern Slavery can take the form of unpaid work, excessive working hours, human trafficking, forced labour, debt bondage and child labour. It's estimated that in excess of 40 million people across the globe are living in Modern Slavery. We cannot ignore practices such as these, simply because they occur beyond the mine gate.


As a Company we are committed to working with our employees, contractors and suppliers to identify the risks of Modern Slavery and to act where necessary to minimise these risks.

We continue to progressively roll out initiatives supporting this objective. They include communicating our compliance requirements to vendors and raising internal awareness of the issue, with a particular focus on areas of higher risk, such as use of international shipping, overseas contractors and developing effective mitigation strategies.

Human rights are not constrained to national boundaries. They are universal and we can all play a role to ensure they are upheld.

On behalf of CPM, I am pleased to present our Modern Slavery Statement for 1 January to 31 December 2024 (Reporting Period).

Chen Sui
Chairman - CITIC Pacific Mining Management Pty Ltd



Reporting Entity

The report is made on behalf of CITIC Pacific Mining Management Pty Ltd and its Related Bodies Corporate (as defined in the Corporations Act 2001) that are involved in the operation of the Sino Iron Project.

In this statement, a reference to 'CPM', 'company', 'we' and 'our' is deemed to be a reference to each of the Australian Sino Iron Project Companies which include: CITIC Pacific Mining Management Pty Ltd, Sino Iron Holdings Pty Ltd, Balmoral Iron Holdings Pty Ltd, Sino Iron Pty Ltd, Korean Steel Pty Ltd, MetaGas Pty Ltd, Pastoral Management Pty Ltd, Cape Preston Resource Holdings Pty Ltd, Cape Preston Port Company Pty Ltd, Pilbara Land Management Pty Ltd and Altus Shipping and Logistics Pty Ltd.

The above companies are all wholly owned subsidiaries of the Hong Kong listed company CITIC Limited. Headquartered in Perth, CPM was established to manage the construction and operation of an integrated mining, processing and port operation supplying high grade, low impurity iron ore product to the steel mills of Asia (the 'Sino Iron Project' or 'Sino Iron').

In just over a decade, the Sino Iron Project has transformed from a greenfields location on the Pilbara coast to a fully integrated, pit-to-port magnetite mining, processing and export megaproject. Over the life of the project, it's estimated more than \$51 billion will be spent on local goods and services in Western Australia alone.

Today, Sino Iron is the world's largest seaborne supplier of magnetite concentrate to China and a pioneer of iron ore value-adding in Western Australia. CPM is spearheading the growth of a new industry in Australia through large scale mining and downstream processing of magnetite ore.

This statement is published pursuant to the Modern Slavery Act 2018 (Cth) and will cover the actions the company has taken to address modern slavery in its operations and supply chain for the Reporting Period.



VISION AND VALUES

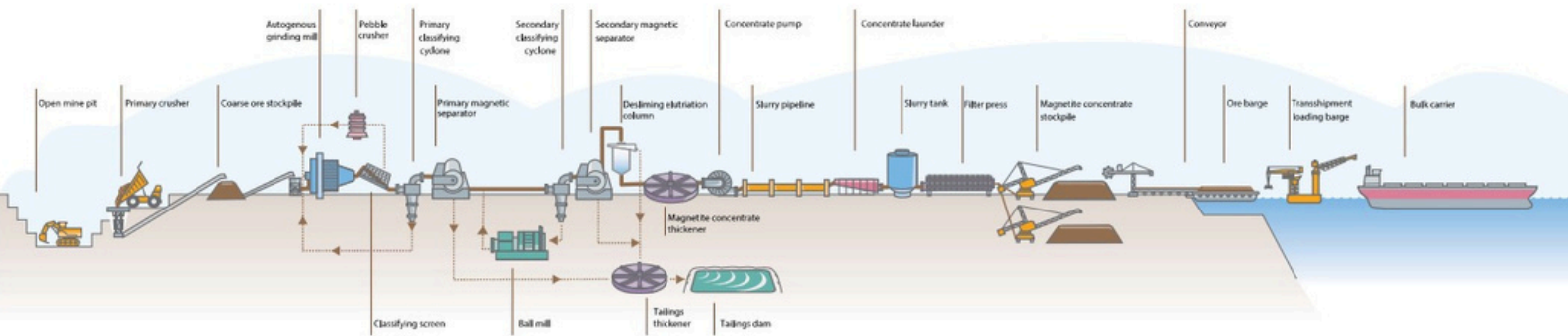
OUR VISION

To be a world-leading producer of magnetite concentrate by working collaboratively with our stakeholders to safely mine, process and export this valuable mineral resource.

OUR VALUES

- **Integrity** - always doing what is right, fair and safe
- **Harmony** - an inclusive environment welcoming for all
- **Dedication** - making safety and wellbeing our top priority
- **Creativity** - seeking ways to improve ourselves and our business
- **Excellence** - striving for the highest standards
- **Cohesion** - working together to achieve our goals

Our Operations



Since commencing production in 2013, Sino Iron has become the largest magnetite mining and processing operation in Australia.

The project directly and indirectly employs approximately 3000 people, more than 97% of whom are Australian residents.

Located 100km south south-west of Karratha on Western Australia's Pilbara coast, in the Reporting Period more than 14 million (wet metric) tonnes of concentrate (Cape Preston Concentrate) was shipped from the Port of Cape Preston.

Over the years, CPM has invested heavily in iron ore mining and processing facilities and supporting infrastructure including a 480MW combined cycle gas-fired power station, 51 GL reverse osmosis desalination plant and a dedicated port for transshipping activities.

The focus of this value-adding operations is a six-line processing area, where low-grade magnetite ore undergoes an intense beneficiation process, which includes crushing, screening, grinding, magnetic separation and filtering. The end result is a premium high grade iron ore product with low impurities.

The concentrate is conveyed in a slurry form to the port area, where it is dewatered and reclaimed from stockpiles and transported via a conveyor to the barge loading berth. Transshipment is used to transport the concentrate by barges and self-unloading vessels to deeper water for loading onto bulk carriers, mainly to China.

Cape Preston Concentrate is an ideal material for pellet-making - the preferred feedstock in conventional steelmaking.



OUR OPERATIONS

Under the Western Australian Government's container recycling scheme, collectors such as CPM are paid a small amount for each container collected and recycled.

CPM has established the CITIC Community Support Fund (CCSF), which provides grants of up to A\$5000 to local community organisations in the areas of Education and Training; Healthy, Active Lifestyles; Cultural Learning and Exchange; Environmental Responsibility; and Youth Support and Development.

There are two funding rounds each year. In 2024 grants were awarded to the North West Multicultural Association, the Gurlu Gurlu Maya Children's Service and medical emergency service Careflight.

CPM has a longstanding partnership with the Clontarf Aboriginal Academy. Clontarf provides support to indigenous youth in the region where Sino Iron is located.

In 2024 CPM's financial contribution of A\$30,000 helped Clontarf to run programs aimed at encouraging Aboriginal children to attend school, with the objective of giving them the academic experience and life-skills to go onto further education or gain employment upon graduation.

CPM extends its support for events of significance to Sino Iron's Traditional Owners and Indigenous staff members. This includes promotion events such as annual National Aboriginal and Torres Strait Islander Committee activities, also known as NAIDOC Week.

The company also organises events related to International Women's Day, focused on the achievements of female employees and contractors.

Our Supply Chain

CPM's supply chain is vast and our Suppliers operate in the below sectors and countries.

SECTORS



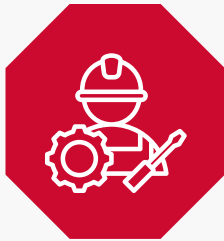
Accommodation and Food Service Activities



Information and Communication



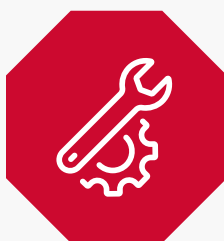
Administration and Support Services



Labour Hire



Agriculture, Forestry and Fishing



Maintenance and Repair of motor vehicles



Arts, Entertainment and Recreation



Manufacturing



Building services contractor



Mining and Quarrying



Cleaning



Personal services



Our Supply Chain

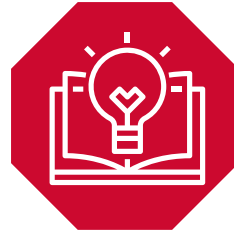
SECTORS



Construction



Professional and Scientific Services



Education



Real estate



Electricity, Gas, Steam and A/C supply



Retail



Finance and Insurance



Security Services



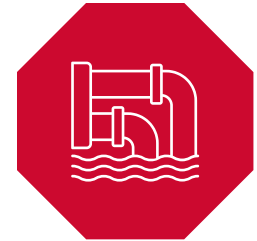
Government administration, Defence and Social Security



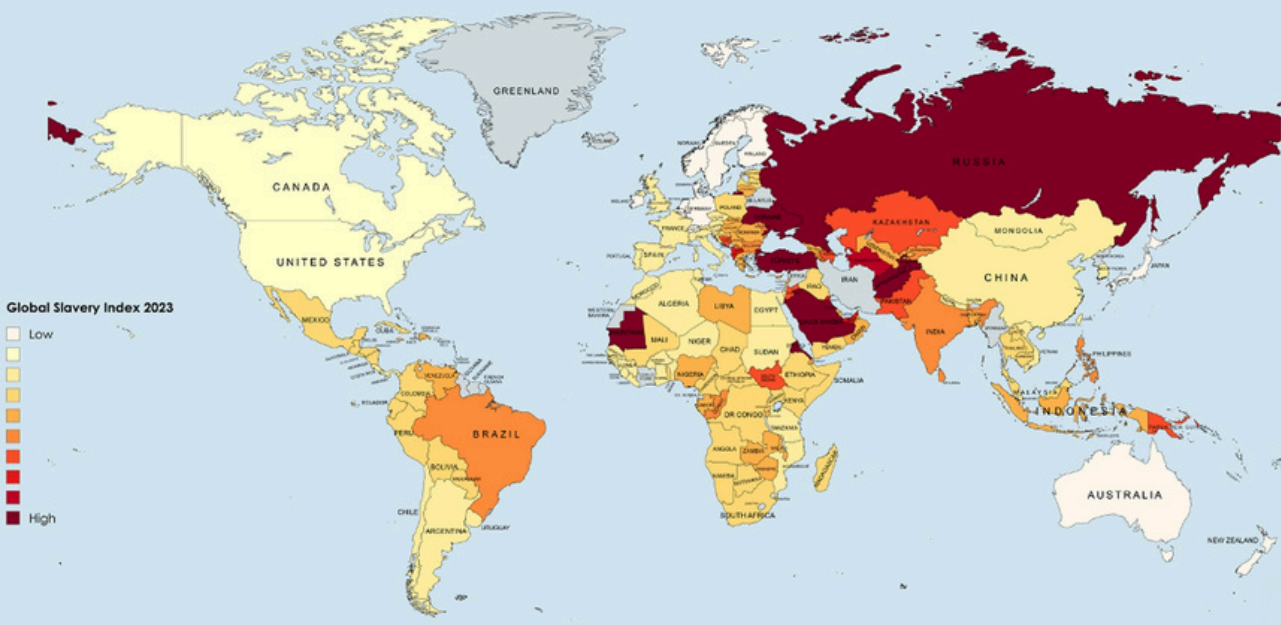
Transportation and Storage



Health and Social Work



Water supply, Sewerage and Waste Management



TOP CATEGORIES OF SPEND BY COUNTRY

CATEGORY	AUSTRALIA	CHINA	GERMANY	HONG KONG	JAPAN	NORWAY	SINGAPORE	USA
Services Other (Incl, Labour Services, Freight Transport)	84%					1%	15%	
Fuel - Distillate	100%							
Hire Labour	100%							
Maintenance, Repair and Operations (MRO) Material	95%	3%		1%			1%	
Explosives	100%							
Hire Equipment	69%						31%	
Mining Fleet Equipment	99%	1%						
Services Engineering	100%							
Fixed Plant Equipment	76%	18%	3%		1%			2%

Active Contract Details and Figures for the Reporting Period

During the Reporting Period there were 177 active Contracts with Tier 1 suppliers, covering all supply types, including Goods, Services, Labour hire and Works. Values committed for those Tier 1 Contracts is in the region of AUD 1.2 billion.

Engagement of Suppliers to facilitate Self-Assessment Questionnaires (SAQ's)

CPM expanded its engagement with a third party service provider to support the distribution and analysis of SAQ's. This initiative reflects our continued commitment to ethical sourcing and compliance with the Modern Slavery Act 2018 (Cth).

This Reporting Period, the SAQ's were issued to a broader group of Tier 1 and key suppliers, increasing visibility across our inbound supply chain. The SAQ's focused on key risk areas including recruitment practices, labour management, subcontractor oversight, supply chain transparency, and internal control frameworks.

*Tier 1 suppliers are those with whom the company has a spend of \$1million (AUD) or more.

The outcome of the SAQ's flagged a number of modern slavery risks that required further investigation and review. Risks identified were primarily due to gaps in recruiter screening processes and a lack of formal controls to ensure ethical labour sourcing. In particular, some suppliers did not demonstrate mechanisms to evaluate recruitment providers or enforce the principle that workers should not bear recruitment costs. A more detailed summary of the SAQ findings is provided in the section "Actions taken to address risks including Due Diligence and Remediation".

Several suppliers also failed to respond or submitted incomplete questionnaires. These gaps will be addressed through follow up engagement in 2025.



Updated Report Summary

During the Reporting Period, CPM purchased goods and services from 1,084 different vendors and incurred total expenditure of AUD1.47 billion. The purchasing activities remained diverse and our largest spend fell into the categories of fuels (which primarily comprised of diesel supply), followed by export chartering services and on-site labour hire.

Of our total expenditure, 87% was against our Tier 1 suppliers with whom CPM has a direct contractual relationship. Total expenditure against those Australian based Tier 1 entities was around AUD1.26 billion. For the remaining Tier 1 suppliers that were based overseas, the vast majority of spend was from suppliers in Singapore and China.

Expenditure during the Reporting Period

- Number of vendors that CPM purchased from - **1,084**
- CPM's total expenditure - **AUD1.47 billion**
- CPM's committed total expenditure with Australian entities - **86%**

RISKS IN OPERATION AND SUPPLY CHAIN

Within CPM's Operations and Supply Chain, there are a number of key areas of vulnerability as it relates to Modern Slavery:

1

Awareness

In Australia, the prevalence of modern slavery practices is quite low. In fact, in Asia and the Pacific region, out of 27 countries that were ranked according to the modern slavery prevalence, Australia ranked 26 with a prevalence of 1.6 out of 1000 people. [1]

CPM recognise that many of the 25 countries who have a greater prevalence are involved in our complex supply chain. For this reason, CPM have placed increased focus on raising the awareness of key suppliers who have a more direct contracting relationship with contractors in these regions. [1]

2

Geographical and Sector Risk

As reported in previous reporting periods, CPM's supply chain continues to operate in sectors and regions that are reported as being high risk in relation to Modern Slavery.

As it relates to sector risks, it is well known that industries involving low skilled labour and those with a reliance on outsourcing can have a higher prevalence of Modern Slavery. This includes certain types of manufacturing, construction and mining processes.

As it relates to geographical risks, CPM's suppliers continue to operate in areas that statistically have a higher prevalence of modern slavery. Many of these countries have weaker rule of law, as well as increased economic and political instability, which can exacerbate the prevalence. [2]

[1] Walk Free. (2023). Asia and the Pacific – Regional findings. Global Slavery Index. <https://www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific/> (Accessed: May 2025)

[2] Australian Government. (n.d.). Modern slavery resources. Modern Slavery Register. Retrieved June 18, 2025, from <https://modernslaveryregister.gov.au/resources/>

RISKS IN OPERATION AND SUPPLY CHAIN

3

International Shipping

CPM often charter Ocean Going Vessels (“OGV’s”) and although the seafarers are not employed by CPM, they belong to an industry group that are particularly vulnerable. Key factors include restricted movements, overtime and significant isolation. Across the world, there has also been an increase in abandonment of seafarers at ports by various shipowners. [3]

4

Inadequate Policies and Procedures

Both CPM and its Supply Chain need to ensure that there are adequate policies and procedures in place which are not only understood by their respective personnel but which are considered broad enough to deal with the many different types of modern slavery.

For example, policies should consider human trafficking, slavery, forced labour, forced marriage, servitude, debt bondage, deceptive recruiting and the worst forms of child labour. [4]

CPM also appreciates that as regulations increase around the world to deal with modern slavery, those who impose modern slavery practices will find new ways of exploiting people. CPM needs to ensure its response to modern slavery is mature and robust enough to identify and address these new risks.

[3] Landon, F. (2023). Charting a course away from modern day slavery. The Mission to Seafarers. <https://www.missiontoseafarers.org/the-sea/charting-a-course-away-from-modern-day-slavery> (Accessed: May 2025)

[4] Attorney-General’s Department. (n.d.). Types of modern slavery. Modern Slavery in Australia. <https://www.modernslavery.gov.au/about-modern-slavery/types-modern-slavery> (Accessed: May 2025)

Actions taken to Address Risks including Due Diligence and Remediation



Due Diligence

As it relates to dealing with the above risks in its Supply Chain, for each risk identified, CPM has identified below the steps it has taken during the Reporting Period:

01 Awareness

- CPM has updated its website to include revised text for its modern slavery statements so the statement is more accessible and visible.
- CPM continue to ensure that new Capital Projects have a greater focus on Modern Slavery risks. In this respect, all risk assessments (for the Capital Project) have a field that is dedicated to Human Rights and Modern Slavery. This will ensure that CPM personnel putting forward a new capital expenditure request will adequately consider the potential for modern slavery or any human rights issues (including but not limited to issues that could arise during the procurement of any materials).
- The CPM Modern Slavery Working Group identified new members from both the Human Resources and Environment departments to join the existing group to increase the Group's level of diversity and key stakeholder engagement.
- Members of the Working Group reviewed Modern Slavery Statements of other Mining Operators to consider whether there are other initiatives that CPM could consider.
- Ensuring that members of the Modern Slavery Group attended modern slavery conferences to stay up to date with current trends in modern slavery practices as well as any suggested ways of addressing new risks.
- CPM Risk Management Committee (comprised of various CPM Directors) continued to oversee the progress made by the Modern Slavery Working group during the Reporting Period and provided strategic direction on current and future action items.
- Arranged for employees to complete the online Modern Slavery training, which during the Reporting Period had a 94% completion rate.

Actions taken to Address Risks including Due Diligence and Remediation



02 Geographical and Sector Risk

Dealing with Geographical risk when sourcing goods and services is a complex task given the vast number of different subcontractors a supplier can engage. As mentioned above, to better manage the risk, CPM conducted two separate reviews of key suppliers via its SAQ process which included:

1. Review of 10 key Suppliers
2. Review of 25 key Suppliers

Following each SAQ, a detailed report was produced which included:

- Risk assessments of each supplier, providing for:
 - Inherent risk score - the modern slavery risk inherent in a supplier's operation and supply chain
 - Unmitigated risk score - the residual modern slavery risk after the controls around modern slavery utilised by the Supplier were applied. The controls included policies, processes and procedures that a Supplier implemented.
- Aggregated risk score for CPM and suggested mitigation actions for specific suppliers.
- Overview of Supplier responses to key questions.
- Identification of the specific countries and industries in which our Suppliers operate and consideration of the extent to which those countries and industries have heightened modern slavery risks.
- Identification of action items which suppliers can take to decrease their unmitigated risk score. CPM is working with specific suppliers to address these action items.

Actions taken to Address Risks including Due Diligence and Remediation



03 International Shipping

- CPM continue to use Rightship assessments. Rightship is a leading maritime risk management and assessment organisation that is engaged by CPM to provide a report on any new vessel that is to be engaged for Chartering of Vessels. It can be used to verify that the vessel's condition, quality, safety systems, health and wellbeing of seafarers are at an appropriate standard. [5]
- In December 2024, CPM received a Rightship assessment on a new vessel that CPM was considering for future voyages. The assessment revealed that the owner of the vessel was being investigated by the International Transport Workers Federation for specific concerns around Seafarers it utilised. As a result of this assessment, CPM refused to use the relevant vessel.
- To support seafarers, CPM commenced liaising with seafarer wellbeing organisations and considered initiatives to provide support seafarers. These initiatives will be further explored in 2025.

04 Inadequate Policies and Procedures

- CPM also completed its own internal self-assessment for Modern Slavery utilising the same software that is used for vendor SAQ's. All the findings and recommendations of the report have been considered and will be used to continually improve CPM's response to Modern Slavery.
- CPM updated its tender documentation to include a requirement that all tenderers submit their modern slavery policy with their tender submission. Even though not all tenderers will become CPM vendors, it was considered important for CPM to extend its expectations to all potential stakeholders.

[5] RightShip. (n.d.). Vessel inspections | Shipowner solutions. Retrieved June 18, 2025, from [Attorney-General's Department. \(n.d.\). Types of modern slavery. Modern Slavery in Australia. https://www.modernslavery.gov.au/about-modern-slavery/types-modern-slavery \(Accessed: May 2025\)](https://www.modernslavery.gov.au/about-modern-slavery/types-modern-slavery)

REMEDIATION



CPM did not identify any direct instances of Modern Slavery in the Reporting Period.

However, as indicated above, there were reports of an investigation by International Transport Workers Federation into a vessel CPM was considering to Charter. As an investigation was already underway and the seafarers had already been identified, CPM did not take any direct action. However, it has raised our level of vigilance in respect of the risks in this area.

CPM continued to maintain a Whistleblowing Policy that provides a mechanism for directors, officers, employees, suppliers and contractors to report misconduct or an improper state of affairs of circumstances.

CPM also has a dedicated integrity line, which is a channel for employees and others to raise concerns of inappropriate behaviour, including bullying, harassment, discrimination and unethical practices. Although it is not specifically designed for modern slavery, it is another avenue that could potentially capture adverse practices.

A Workplace Grievance Policy was utilised to provide a mechanism for addressing employee concerns about their conditions of employment or behaviours of other employees that are having an unreasonably negative impact on their ability to carry out their duties. Under the policy, the employee will first be taken through an informal process to see if the dispute can be resolved. If the employee is not satisfied with the outcome, then a more stringent investigation will commence.

As always, if a Modern Slavery instance did arise, CPM would be guided by its Anti-Slavery Policy. However, remediation would be dealt with on a case basis, which focuses on upholding the human rights of the individuals involved at all times.

ASSESSING EFFECTIVENESS

CPM continued to assess its effectiveness of actions being taken to assess and address modern slavery risks by attending to the following:



- * Confirming the internal completion rates for Modern Slavery Training.
- * Measuring the number of contracts in which contractors were asked to expressly comply with the Anti-slavery policy.
- * Reviewing the UN Guiding Principles on Business and Human Rights.
- * CPM Modern Slavery Working Group completed its own self-assessment for Modern Slavery and reviewed the findings.
- * CPM conducted a review of its maturity in relation to Modern Slavery by assessing its own progress against the KPMG Slavery Maturity Checklist. The Checklist assessed:
 - the maturity of its risk appetite, values and level of ambition to respect human rights and contribute to eradicating modern slavery;
 - whether the board receives periodic reports on modern slavery risks;
 - how CPM identify and assess modern slavery risks;
 - how CPM develops and implements activities to manage modern slavery risks; and
 - the effectiveness and continuous improvement of monitoring and reporting on modern slavery risks.



CONSULTATION

In order to prepare this statement, each of the CPM reporting entities were consulted along with any entities it owns or controls.

As indicated in previous Statements, CITIC Pacific Mining Management Pty Ltd is the managing entity for the Sino Iron Project and its Board of Directors maintains oversight of the governance of the project.

The Management Committee, consisting of CPM's Board of Director and senior managers, meets monthly to discuss and provide direction on key matters concerning the project.

This Modern Slavery Statement was drafted with input from departments forming the frontline business units and has been reviewed and approved by the CITIC Pacific Mining Management Board of Directors prior to its submission and publication.

LOOKING FORWARD

CPM prioritise continuous improvement with each Modern Slavery Statement it submits.

During the Reporting Period, CPM completed three significant activities that will greatly inform its 2025 activities.

1. Completion of the KPMG Maturity assessment. The checklist identified a number of initiatives which CPM can consider implementing in 2025, such as:

- engaging with key functions in the business to implement a modern slavery roadmap of activities;
- engaging with third party experts to improve the modern slavery policy;
- establishing KPIs for those with functional responsibility for modern slavery risks; and
- assessing the effectiveness of CPM's modern slavery training.

2. Completion of the Modern Slavery self-assessment, which made a number of recommendations, including the creation of a vulnerability assessment policy.

3. Completion of the SAQ process, which upon completion and review of findings led to the following action items being identified:

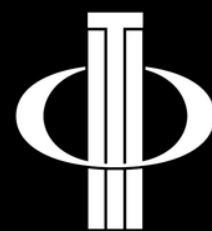
- **Follow up High Risk Suppliers**
 - Conduct direct follow up with identified suppliers to confirm remedial actions, focusing on improved recruiter due diligence and ethical labour practices.
- **Expand Assessment Coverage**
 - Broaden participation to include additional Tier 1 suppliers to strengthen visibility across high priority segments of the supply chain.
- **Address Non-Responses**
 - Re-issue the SAQ to non-responding suppliers with clearly defined expectations and timeliness, supported by targeted engagement to ensure participation.
- **Integrate Risk Insights**
 - Investigate possible integration of supplier risk data into procurement and onboarding workflows to enable more informed decision making.
- **Enhanced Engagement**
 - Continue working with our external assessment partner to explore platform improvements, reporting capabilities, and new opportunities to strengthen compliance across our Tier 1 supplier base.

APPENDIX 1: REPORTING CRITERIA

Each section of the CPM Modern Slavery Statement 2024 is aligned to the mandatory reporting criteria required under the Modern Slavery Act 2018 (Cth).

Reporting criteria	Section this is covered
Section 16 (a) Identify the reporting entity	Reporting Entity, page 1
Section 16 (b) Describe the reporting entities structure, operations and supply chains	Reporting Entity, page 1 Our Operations, page 4 Our Supply Chain, page 6
Section 16 (c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Risk in Operation and Supply Chain, page 10
Section 16 (d) Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address the risks, including due diligence and remediation processes	Due Diligence, page 12 Remediation, page 15
Section 16 (e) Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing Effectiveness, page 16
Section 16 (f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls (ii) in the case of a reporting entity covered by a statement under section 14 - the entity giving the statement	Consultation, page 17
Section 16 (g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Looking Forward, page 18





CITIC PACIFIC
MINING

Modern Slavery Statement

2024

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