

Australian Modern Slavery Statement 2021

Tronox Limited

1 Introduction

The Australian *Modern Slavery Act 2018* (Cth) requires certain businesses to disclose their efforts to address the issue of forced labour and human trafficking in their business operations and supply chains. The law was designed to increase consumers' knowledge about products they buy and the companies they choose to support.

This Modern Slavery Statement (**Statement**) is made by Tronox Limited ACN 153 348 111, Tronox Mining Australia Limited ACN 009 247 858, Tronox Pigment Bunbury Ltd ACN 008 683 627 and Tronox Management Pty Ltd ACN 009 343 364 (together, the **Reporting Entities**) for the reporting period 1 January 2020 to 31 December 2020.

2 The structure, operations and supply chains of the Reporting Entities

2.1 Overview of Tronox

The Reporting Entities form part of the Tronox group of companies, whose ultimate parent company is Tronox Holdings plc. Tronox is the world's largest integrated manufacturer of titanium dioxide pigment. Tronox operates titanium-bearing mineral sand mines and beneficiation and smelting operations in Australia, South Africa and Brazil to produce feedstock materials that can be processed into titanium dioxide for pigment, as well as high-purity titanium chemicals, including titanium tetrachloride and Ultrafine© titanium dioxide. It is our long-term strategic goal to be vertically integrated and consume all our feedstock materials in our 9 TiO₂ pigment facilities located in the United States, Australia, Brazil, UK, France, the Netherlands, China and the Kingdom of Saudi Arabia. The mining, beneficiation and smelting of titanium-bearing mineral sands creates meaningful quantities of zircon that we also supply to customers around the world.

2.2 Corporate structure

Tronox Limited is a company limited by shares, incorporated and domiciled in Australia. Its registered office is Lot 22 Mason Road Kwinana Beach Western Australia 6167. Tronox Limited is the Australian parent company of Tronox Management Pty Ltd, Tronox Mining Australia Limited and Tronox Pigment Bunbury Ltd.

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

2.3 Operations

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

Cooljarloo Mine

Brand Highway
P.O. Box 31, Dandaragan
Cataby 6507

Western Australia

Tronox's "Northern Operations" derives its feedstock from the Cooljarloo Mine in the Mid-West region of Western Australia. At Cooljarloo, Tronox mines ore deposits using dredging techniques before running it through a concentrator to produce heavy mineral concentrate (**HMC**). HMC is transported by road to the Chandala Processing Plant. The Cooljarloo facilities began operation in 1989 and together with Chandala (see below) employ approximately 257 employees.

Chandala Processing Plant

742 Brand Highway

Muchea 6501

Western Australia

The Chandala Processing Plant includes a dry mill, a synthetic rutile plant and a residue management plant. Zircon, rutile and leucoxene are either bagged or sold in bulk. Ilmenite is further processed into synthetic rutile using reduction, aeration and acid leaching. The Chandala facilities began operation in 1989.

Kwinana Pigment Plant

Lot 22 Mason Road

Kwinana Beach 6167

Western Australia

Of the 220,000 metric tons of synthetic rutile produced each year at the Tronox Chandala Processing site, a significant amount is sent to Tronox's Kwinana pigment plant to be converted through the chloride process into titanium dioxide. The Kwinana facilities began operation in August 1991 and have approximately 360 employees.

Bunbury Plant

869 Marriott Road

Kemerton Industrial Park

Western Australia

Old Coast Road

Australind 6233

Western Australia

The Kemerton plant is in the Kemerton Industrial Park, 24 kms north of Bunbury in Western Australia. The plant occupies a 55-hectare site that it shares with satellite plants supplying raw materials such as chlorine, caustic soda, gaseous oxygen and nitrogen. The plant produces TiO₂ through the chloride process, which uses chlorine to react with titanium-bearing ores. Finishing of product is conducted at the nearby Australind plant. The sites employ approximately 270 employees.

Southern Operations

**Lot 962 Koombana Drive
North Shore
Bunbury 6230
Western Australia**

Tronox's mining and mineral separation operations include mines in the South West region of Western Australia and the Mineral Separation Plant (**MSP**) at North Shore Bunbury adjacent to the port. The MSP is important for the separation of mineral concentrate from the Murray Basin and Wonnerup mines. Tronox has been operating in WA's South-West since 1956. The operation employs approximately 113 employees.

Eastern Operations

**PO Box 444
Broken Hill 2880
New South Wales**

Tronox presently has two operating mines in the Murray Basin. Dredge mining has been in operation at the Ginkgo mine near Pooncarie since December 2005. Surface mining commenced at the nearby Snapper mine in 2010 with the second dredge commencing at Snapper in January 2011. The ore is initially concentrated at site and then trucked to Broken Hill for further processing. The approximate number of employees at these sites is 159.

2.4 Supply chains

The Reporting Entities' supply chain personnel are based in Western Australia, Victoria and New South Wales. The following provides a high level overview of industry categories relevant to the supply chain.

- Capital
- Chemicals
- Engineering
- Energy
- Environmental
- Equipment Hire
- Exploration & Mining
- Facilities
- IT & Telecom
- Labour Hire
- Leases
- Logistics
- Maintenance Services
- MRO
- Packaging

- Professional Services
- Royalties, Native Tile, Land
- Utilities
- Warehousing/Leasing

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

3 Risks of modern slavery practices and actions to address, including due diligence and remediation

3.1 In operations

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

Employees are required to undertake regular training in the Code of Conduct. In addition, Tronox employees are required to certify upon commencement of employment with Tronox that they have read and understood the Code of Conduct. The Code of Conduct also provides that if a Tronox employee needs guidance on an ethical or legal question or has knowledge of a potential violation of the Code of Conduct, policies or procedures, he or she must seek advice from one or more of a list of resources or report it via a 24-hour help line. The same channels are open to third parties. All reports of alleged violations will be investigated. If the results of an investigation indicate that corrective action is required, Tronox will decide the appropriate steps to take, including discipline, up to and including termination of employment or, in the case of a third party, the business relationship.

3.2 In supply chains

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

Tronox is committed to ensuring that slavery and human trafficking is not taking place in any form within Tronox's business or any part of its supply chain. In line with this Tronox has in place policies and procedures to ensure the deterrence of any such conduct including the Code of Conduct. Additionally, Tronox has established a specific Supplier Code of Conduct (**Supplier Code of Conduct**). Tronox expects our suppliers to adhere to both the Code of Conduct and Supplier Code of Conduct, which set out our expectations to ensure issues of human trafficking and slavery do not take place in its business or supply chains. Tronox is committed to complying with all applicable laws, rules, and regulations governing employment, immigration and labour relations, including child labour, working hours and fair wages, and expects each of its suppliers to act accordingly. The use of child labour by suppliers and representatives is prohibited.

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

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

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

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

In addition, Tronox's template supply contracts require suppliers to comply with specific obligations relevant to the *Modern Slavery Act* including:

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

Tronox proposes to issue questionnaires to its suppliers identified as highest risk by industry, as well as a number of key suppliers, in order to understand their individual risks more clearly and make an assessment of that risk.

4 Assessing the effectiveness of actions

During this initial reporting year, the Reporting Entities have focused their efforts on understanding supply chain risk and educating key personnel in relation to modern slavery risk.

During the remaining course of 2021, Tronox intends to further enhance its capabilities and processes to address modern slavery risk and, in tandem, develop means to assess the effectiveness of those actions.

Tronox has not been involved in any remediation processes within the Reporting Period.

5 Process of consultation

This statement reflects the position of each of the Reporting Entities and was developed in consultation with the Legal, Compliance, Human Resources and Procurement teams of the Reporting Entities.

This statement will be published on the internet on the Australian Government's Online Register for Modern Slavery Statements.

This statement was approved by the board of directors of each of the Reporting Entities on 29 June 2021.

Duly signed by:

Cawillan

Director Tronox Limited and Company Secretary of the Related Entities