

## 2023 MODERN SLAVERY STATEMENT

### Acknowledgement

Metro Mining acknowledges the Ankamuthi People, the Traditional Custodians of this land on which Metro is privileged to operate in Cape York North Queensland. We also acknowledge the Jagera People and the Turrbal People as the Traditional Custodians of Brisbane, the lands on which our corporate head office is located and the Gimuy Walubara Yidinji and Yirrganydji People as the Traditional Custodians of the lands on which our Cairns office is located.

We pay our respects to all Traditional Elders past, present and emerging and acknowledge and respect the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples on these lands.

### About this Statement

Metro Mining's Modern Slavery Statement (Statement) outlines the Company's commitment and actions taken to identify, manage and respond to modern slavery risks in our operations and supply chain. The Statement has been prepared in accordance with Australia's *Modern Slavery Act 2018 (Cth)* (Modern Slavery Act) and relates to Metro Mining's financial year ending 31 December 2023 (FY2023).

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

### Mandatory criteria

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

<b>Mandatory Criteria</b>	<b>Page number/s</b>
1. Identify the reporting entity	1
2. Describe the reporting entity's structure, operations and supply chains	2-3
3. Describe the risks of modern slavery practices in the operations and supply	3-4
4. Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes	4-5
5. Describe how the reporting entity assesses the effectiveness of its actions	6

6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	6
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant	N/a

### **Our approach**

Our purpose is to make a difference by mining essential minerals to improve lives now and into the future. We seek to earn and retain the trust of our shareholders and partners to realise the potential of our resources. Operating in a manner that respects human rights and addresses the risks of modern slavery is fundamental to the way we do business, and we expect those we work with to do the same.

We require our suppliers to comply with lawful business practices and applicable Metro Mining policies, standards, procedures and processes, as relevant to the work they are performing for us, including our approach to modern slavery. Our response to managing the risks of modern slavery in our operations and supply chains continues to be guided by the United Nations Guiding Principles on Business and Human Rights.

### **Overview of structure, operations and supply chain**

Metro Mining Limited (ASX: MMI) is an Australian mining and exploration company. Metro's flagship project is the Bauxite Hills Mine, which is a single operating mine combining two Environmental Authorities covering the Bauxite Hills and Skardon River tenements. The Bauxite Hills Mine has an estimated Reserve of 83.2 million tonnes (Mt) and a total Resource of 118.7 Mt and has been operating since April 2018. Bauxite Ore from the mine is shipped to meet China's growing bauxite market; where Cape York bauxite is well known and highly regarded. In addition to our mining operations, in 2023 the Company established a marine division and in early 2024 we welcomed our offshore floating terminal, Ikamba, to the Port of Skardon where it commenced transshipping operations in tandem with our transshipping contractor's floating crane.

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

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

Metro Mining owns 100% of the Metro Bauxite Hills Operation located 95 kilometres north of Weipa in Queensland's Weipa Bauxite region. The Metro Bauxite Hills Operation has been in operation since 2018. The site is located on the country of one Native Title claimant group, the Ankamuthi People. At the

Metro Bauxite Hills Operation, Metro Mining mines bauxite which is then shipped to China to make aluminium.

Our supply chain relates to the mining and shipping of bauxite to China. This includes suppliers of mining equipment (trucks, mobile plant, vehicles, fixed plant, etc), telecommunications, clothing, tools, personal protective equipment, etc. Certain services such as transshipping, camp facilities, catering, maintenance, IT services and cultural heritage are provided by Australian contractors on site, with management, administration, mining, operations and technical services activities undertaken by direct employees. In 2023 Metro Mining's expenditure on goods and services totaled \$245M. Australian-based suppliers represented 69% of this expenditure. The balance 31% largely relates to costs associated with ocean freight, with these vendors being based in either Singapore or Germany.

As of December 2023, Metro Mining directly employed 158 permanent and maximum term employees and with our contractors, engaged a total workforce of 370 people across our operations.

### **Modern slavery risks in our operations and supply chain**

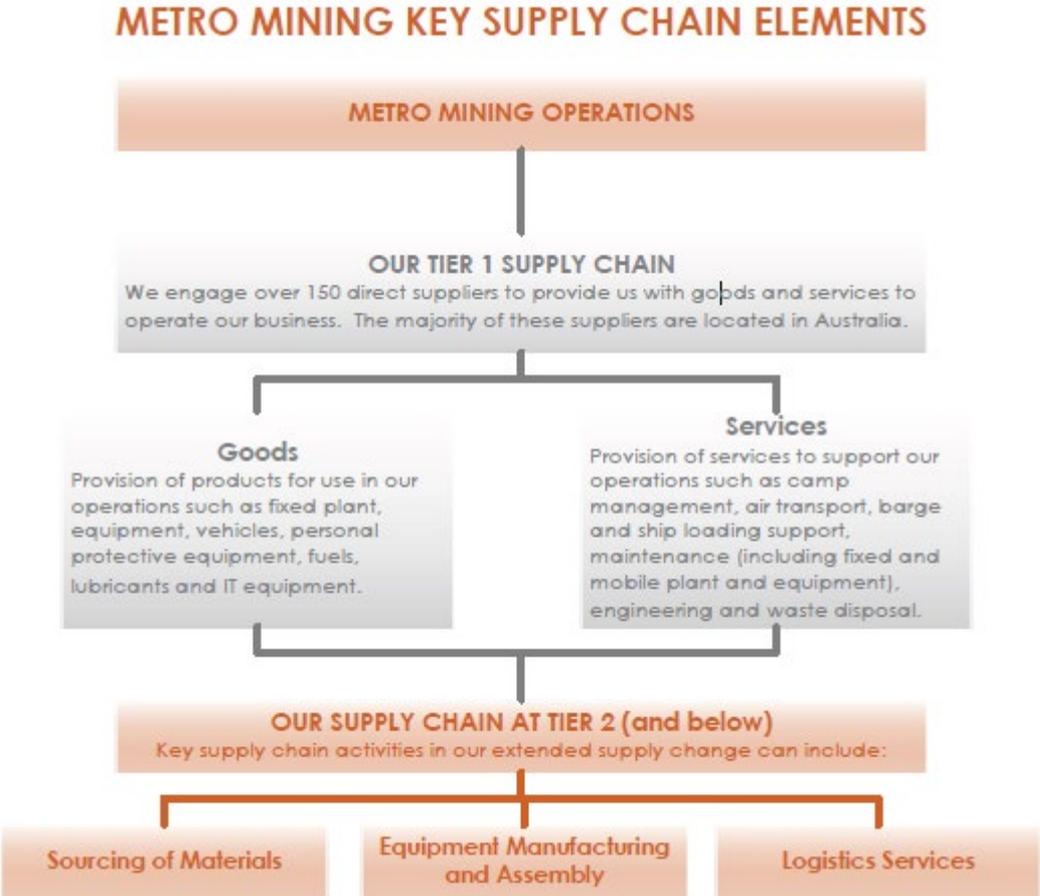
The Modern Slavery Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services and the worst forms of child labour.

Modern slavery risk is likely to arise:

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

It is recognised that modern slavery risk can exist in Metro's supply chain and operations. For Australian based operations, it is considered that the risk is relatively low, given existing protections and regulations in place to protect employees. Specifically, the risk of modern slavery occurring because of Metro Mining's direct conduct is minimal due to our governance framework, systems and processes. For that reason, our risk management approach is focused on identifying, managing and mitigating modern slavery risk in our supply chain.

The diagram below provides a high-level overview of our supply chain:



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

- the transportation of its product from Australia to China on ocean going vessels;
- procurement of a variety of goods including personal protective equipment and uniforms, construction materials, electrical parts and electronic equipment, tyres and wheels;
- procurement of subcontractors outside of Australia that provide labour on our assets.

**Modern slavery assessment and risk mitigation actions**

We take a proactive approach to identifying, managing and mitigating modern slavery risk. Our risk management principles are set out as follows:

- **Principle 1** – Our Values and Policies demonstrate the expectations required of our employees and contractors in that:
  - We have no tolerance for using suppliers and contractors who engage in exploitative behaviours of modern-day slavery such as child labour, debt bondage, inhumane treatment of employees and forced or compulsory labour;

- We will not purchase products or services from suppliers or contractors who we know violate human rights standards.
- **Principle 2** – We seek to engage with Tier 1 Australian-based providers where possible.
- **Principle 3** – Training and communication about modern slavery risk is provided to everyone as part of our induction process.
- **Principle 4** – We have a defined process and procedure in our Whistleblower Standard to enable employees and contractors to report circumstances / allegations of modern slavery.

Our standard contracts include modern slavery prevention provisions. These clauses place specific obligations on contractors and suppliers to not engage in and mitigate risks relating to modern slavery. Third party contracts are also reviewed by our in-house legal team to ensure modern slavery risk is identified and managed.

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

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

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

## **Governance**

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

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

1. Metro Mining Values
2. Whistleblower Standard

3. People Policy
4. Anti-Bribery and Corruption Policy.

Metro Mining's Board of Directors is committed to fostering a culture of compliance, ethical behaviour and good corporate governance, assisted by its Executive Team, to fulfil the oversight of Metro Mining's management of modern slavery risks. We believe that good governance is the collective responsibility of all, being management, employees, suppliers, contractors and those we do business with. It forms part of our core values and application of responsible business practices.

### **Assessing effectiveness**

Metro Mining continues to take proactive steps in identifying, and therefore reducing, the risk of modern slavery within our supply chain. The Company is committed to being transparent throughout its business dealings. In 2023, there were no instances of modern slavery identified within the supply chain and no reports of modern slavery raised by a whistleblower or through a grievance process.

With oversight by our Audit & Risk Committee, we will continue to assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners and undertaking a regular review of our processes. Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to modern slavery.

### **Consultation**

We consulted with the relevant companies we own or control in the development of this Statement.

### **2024 activities**

As highlighted above, continuous improvement is important to manage and mitigate the risk of modern slavery. Our 2024 activities to date include the establishment of a modern slavery working group and the preparation of a draft modern slavery policy, procedure and response plan as well as a Supplier Code of Conduct. Over the remainder of 2024, we will finalise these documents in conjunction with a review of our procurement processes and requirements. We will also obtain a greater understanding of our supply chain through a detailed analysis of our major suppliers, which in turn will assist in identifying areas of heightened risk of modern slavery for closer oversight and management.

### **Feedback**

We value all feedback on the content of this Statement, please visit the Metro Mining website, [www.metromining.com.au](http://www.metromining.com.au), to provide feedback or request additional information.

## **Approval of Statement**

This Statement has been approved by the Board of Metro Mining as the parent entity on 18 June 2024.

This Statement is signed by Simon Wensley in his role as the CEO and Managing Director of the parent entity on 18 June 2024.

A handwritten signature in black ink, appearing to read 'S Wensley', written in a cursive style.

Simon Wensley  
CEO and Managing Director  
Metro Mining Limited