

MODERN SLAVERY POLICY

1. INTRODUCTION

Modern slavery describes situations where coercion, threats or deception are employed to exploit victims and undermine or deprive them of their freedom. It is defined under the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**) to include a range of exploitative practices including human trafficking, slavery and slavery-like practices such as servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour.

Metals X Limited together with its related entities (**Metals X** or the **Company**) is committed to respecting and protecting human rights and to acting ethically and with integrity in all business dealings and relationships to ensure modern slavery does not take place anywhere in its business, operations or supply chains.

To ensure that it is able to minimise the risk of any modern slavery in its business, operations and supply chains, Metals X is committed to identifying and addressing modern slavery risks; implementing controls and systems to prevent modern slavery from occurring and ensuring its business practices are conducted in a legitimate and ethical manner.

This Modern Slavery Policy (**Policy**) has been formally approved by the Company's Board of Directors (**Board**) and outlines the expectations on Metals X and the individuals working with the Company or on its behalf to support and uphold measures to mitigate risks against modern slavery.

2. SCOPE

This Policy applies to all persons working for or on behalf of, or providing services to, Metals X, including all Directors, Officers, employees, suppliers, contractors and any third parties acting for or on behalf of the Company or a related entity.

3. OBJECTIVE

The Modern Slavery Act took effect on 1 January 2019 and imposes mandatory reporting requirements on organisations that carry out business in Australia with a minimum annual consolidated revenue of at least \$100 million.

As part of the Company's response to meeting the requirements under the Act, this Modern Slavery Policy has been prepared to establish a framework which allows the Company to assess and detect risks, to define reporting protocols and to establish controls to ensure compliance with the requirements of the Act and take actions to prevent, mitigate and where appropriate, remedy modern slavery in its business, operations and supply chains.

4. MODERN SLAVERY POLICY

The Company will adopt policies and procedures to ensure it is addressing modern slavery and ethical sourcing risks in its business, operations and supply chains in a way that is appropriate, including but not limited to:

- (a) Ensuring employment is freely chosen;
- (b) Ensuring no types of forced or bonded labour are used;
- (c) Preventing excessive powers of ownership over employees and staff;
- (d) Preventing coercion, threats or deception to engage employees and staff;
- (e) Preventing harassment or abuse;

- (f) Ensuring freedom of association and appropriate grievance mechanisms and recourse are available;
- (g) Ensuring safe and hygienic working environments are available;
- (h) Preventing bribery, favours or benefits or other similar unlawful or improper payments;
- (i) Ensuring compliance with minimum legal age working requirements;
- (j) Ensuring compliance with applicable laws and regulations regarding local wages, compensation and legally mandated benefits;
- (k) Ensuring compliance with applicable laws and regulations regarding working hours; and
- (l) Ensuring compliance with the Company's other relevant policies, including the Anti Bribery and Corruption Policy, Code of Conduct and Diversity Policy.

The Company's management will conduct risk assessments to determine which parts of its business, operations and supply chains are most at risk of modern slavery so efforts can be focussed on those most at risk areas.

Where appropriate, as informed by risk assessments, the Company will engage with suppliers to gain a proper understanding of the measures they have in place to prevent modern slavery within their own businesses.

Where appropriate, the Company will assess suppliers through an audit/compliance program to confirm compliance with this Policy and may engage external providers to assist in this process where required.

Without limiting the above, the Company will as far as practicable:

- (a) Include in its operational and supplier contract terms requirements that suppliers comply with all local, national and other applicable laws and regulations regarding modern slavery in the areas in which they operate;
- (b) Ensure that contractual terms with Directors, officers, employees, contractors, consultants and suppliers require compliance with this Policy and reserve the right to terminate any contractual arrangement if there is a breach of this Policy;
- (c) Encourage and promote best practices and continuous improvement regarding modern slavery within its business, operations and supply chains;
- (d) Provide training to Directors, officers and employees with relevant roles in relation to this Policy;
- (e) Monitor and review the effectiveness of this Policy on an ongoing basis.

6. ROLES AND RESPONSIBILITIES

With oversight of the Board, the Company's management is responsible for managing modern slavery risks and issues, including implementing controls such as risk assessment processes and due diligence and undertaking mandatory reporting to comply with the requirements of this Policy.

7. COMPLIANCE

It is the responsibility of all Directors, officers, employees, contractors, consultants and suppliers to have an understanding of and comply with this Policy.

Any Director, officer, employee, contractor, consultant or supplier who fails to comply with the provisions as set out above or any amendment thereto, may be subject to appropriate disciplinary or legal action.

8. REPORTING

Directors, officers, employees, contractors, consultants and suppliers who become aware of any actual or suspected breach of this Policy should report this to either the Company Secretary or pursuant to the Company's Whistleblower Policy, if appropriate.

9. REVIEW AND AMENDMENT

This Policy will be reviewed annually and may be amended from time to time in the sole discretion of the Board of Metals X.