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PRINCIPLES



MMG Limited

Modern Slavery Statement 2024

We mine for
progress

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About this statement

This is MMG's fifth Statement under the *Australian Modern Slavery Act 2018 (Cth)*. The Statement is for the financial year commencing 1 January 2024 and ended 31 December 2024.

This is a joint statement that covers the reporting entities (each an 'MMG Reporting Entity') listed below:

- MMG Limited
- Album Resources Pte Ltd
- Album Investment Pte Ltd
- MMG Australia Limited
- MMG Dugald River Pty Ltd.

A list of principal subsidiaries within the MMG Group can be found in Note 16 of MMG's 2024 Annual Report. Album Resources Pte Ltd and Album Investments Pte Ltd are holding companies for a number of entities within the MMG Group, including MMG Australia Limited and MMG Dugald River Pty Ltd.

MMG is submitting this Statement on behalf of the MMG Reporting Entities and our subsidiaries, and the entities owned or controlled the Company. In this Statement, the terms 'MMG', the 'Company', the 'Group', 'our business', 'organisation', 'we', 'us', 'our' and 'ourselves' refer to the MMG Reporting Entities and, except where the context otherwise requires, their subsidiaries.

Table 1 below sets out the mandatory reporting criteria of the Act and where each has been addressed in this Statement.

Table 1. Mandatory reporting criteria

Mandatory reporting criteria	MMG response	Page
Identify the reporting entity and describe its structure, operations and supply chains	About this Statement	3
	Our business, structure and operations	4
	Our supply chain	6
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	Modern slavery risk profile	7
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes	Our approach	10
	Identifying, assessing and taking action on modern slavery risks	14
	Training	17
	Grievances and remedy	18
Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks	Assessing effectiveness	19
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Communication, engagement and disclosure	20

Our business, structure and operations

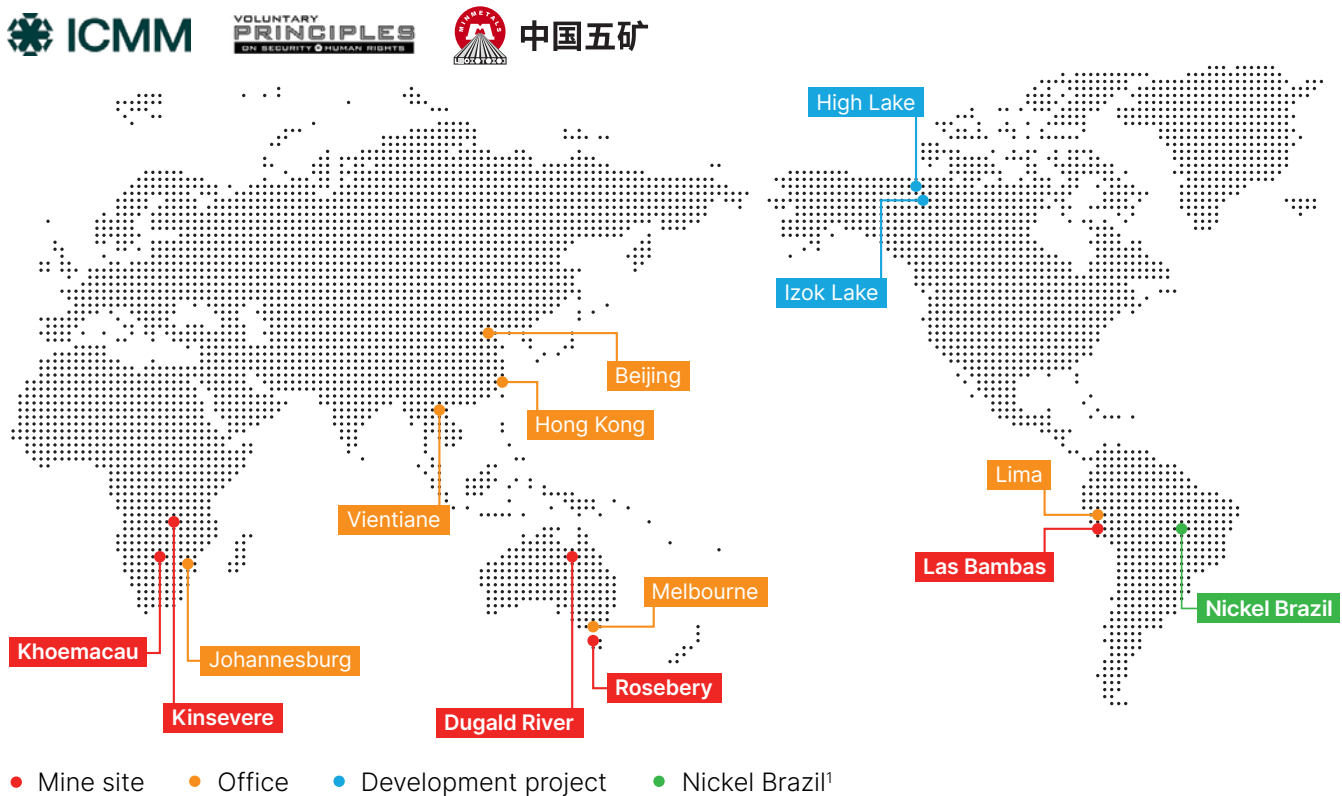
MMG has a vision to create a leading international mining company for a low-carbon future, with sustainability at our core.

We work in partnership with our major shareholder, China Minmetals Corporation (CMC). Our objective is to be valued as one of the world's top mining companies. The support of our major shareholder is fundamental to our success.

We are a global producer of base metals listed on the Hong Kong Stock Exchange (HKEx:1208).

MMG Limited has corporate offices in Melbourne, Australia, Beijing and Hong Kong, China, and we have additional offices in Johannesburg, Lima, Lubumbashi and Gabarone. Our Global Business Services are based in Vientiane.

MMG, through its subsidiaries, operates five mines



MMG Limited has Corporate Offices in Melbourne, Australia, Beijing and Hong Kong, China

Producer of copper and zinc, products essential to a low-carbon economy

Our commitment to international standards and maintaining strong relationships with stakeholders is critical to enabling our growth ambitions

Support from our major shareholder, CMC, underpins our success and positioning as China's premier international metals growth platform

¹ MMG has entered into a Share Purchase Agreement with Anglo American plc for Nickel Brazil. The acquisition is expected to be completed by Q3 2025.

Our business, structure and operations

Continued

In 2024, we employed 19,604 people across MMG. Our people perform a wide range of roles, including corporate roles and manual labour roles through to highly skilled roles, to support our mining operations. The breakdown of our workforce by employment type and site is detailed in Table 2 below.

Table 2. 2024 Total workforce by employment type and site²

Site	Permanent	Temporary	Permanent %	Temporary %	Total workforce
Dugald River	499	379	56.83%	43.17%	878
Khoemacau	519	1,474	26.00%	74.00%	1,993
Kinsevere	887	4,340	16.97%	83.03%	5,227
Las Bambas	2,696	7,939	25.35%	74.65%	10,635
Rosebery	382	262	59.32%	40.68%	644
Australian Operations	20	-	100.00%	0.00%	20
Corporate	205	2	99.03%	0.97%	207
MMG	5,208	14,396	26.57%	73.43%	19,604

Our employees are covered by a variety of industrial mechanisms. Across our operations, 60.47% of employees are covered under collective bargaining agreements. The breakdown by site for collective bargaining agreements is detailed in Table 3 below.

Table 3. 2024 Collective bargaining agreements by site³

Site	Total employees	Collective bargaining agreements	%
Dugald River	485	271	55.88%
Khoemacau	519	423	81.5%
Kinsevere	897	762	85.91%
Las Bambas	2,696	1,315	48.78%
Rosebery	374	192	51.34%
MMG	4,442	2,540	60.47%

More information on our workforce can be found in [MMG's 2024 Sustainability Report](#).

2 Note that in this table, MMG permanent employees represents employees directly employed by MMG. Temporary employees include contractors, consultants and other short-term engagements. Headcount for MMG permanent employees is at 31 December 2024. For temporary workers, this is an average of the total temporary workforce throughout the course of the year.

3 This table only includes employees from our operations. It does not include our corporate offices.

Our supply chains

MMG sources goods and services through a global supply chain to satisfy the requirements of our operating sites and functions, including the following:

Mining and technical services: Construction and services with fixed plant and mobile assets, including labour hire
Logistics: Road and sea transport (trucks and charter vessels); workforce transportation (buses, charter flights and helicopters)
Support services: Security, workforce accommodation, maintenance, cleaning and catering
Corporate and administrative services: Property management, facilities management, travel management, corporate administration services (such as insurance services, accounting and audit)
Procurement of goods/commodities: Personal protective equipment (PPE), uniforms including footwear; fuel; explosives; chemicals; bulk commodities (such as lime); stationery; medical supplies and tools
Procurement of equipment: Electronics, minor electrical equipment and batteries; motor vehicles; mining equipment and infrastructure; mobile fleet, including parts
Energy: Power providers and renewable energy sources

In 2024, MMG had 4,755 active suppliers and our total spend was more than US\$3.01 billion. More than 87% of our total spend is in the countries where our operations are located. Our operations support local economies and businesses by prioritising, where possible, the regional purchase of goods, equipment and services. Table 4 below shows the percentage of suppliers across our top five sourcing countries.

Table 4. Percentage of suppliers by country⁴

Country	Percentage of total suppliers
Peru	39%
Australia	32%
Democratic Republic of the Congo (DRC)	10%
China	5%
South Africa	5%

Our Head Office Supply Chain team delivers key corporate strategic initiatives and provides governance functions and compliance oversight for our site and region-aligned supply chain teams.

Our regional supply chain teams perform sourcing and contracting, contract management, warehouse operations, inventory management, inbound logistics and governance functions and compliance. Our Global Business Services team provides centralised services such as master data maintenance, payroll, accounts payable, purchasing and accounting.

4 Note this table does not include Khoemacau operations.

Modern slavery risk profile

We recognise that the extractives sector is considered high risk for modern slavery practices, especially in countries with a higher prevalence of modern slavery.

Our mining operations in Peru and the DRC are in countries where the estimated prevalence of modern slavery is comparatively higher than our mining operations in Botswana and Australia according to Walk Free's Global Slavery Index 2023.⁵ Although the estimated prevalence of modern slavery in Botswana and Australia is lower comparatively, we recognise modern slavery risks are present in every country and we take a global approach.

Throughout 2024, we continued to assess our modern slavery risk profile across our operations and supply chains.

In terms of our Australian operations and supply chains, we acknowledge the United Nations Special Rapporteur on Contemporary Forms of Slavery concerns on their visit to Australia about the vulnerability of migrant workers and the pattern of exploitation (specifically regarding workers under the Pacific Australia Labour Mobility (PALM) Scheme).⁶ We recognise the risk to be low in terms of our own employees due to the controls in place. However, we continue to assess the potential that we may be directly linked to this issue through our supply chains.

In the DRC, we recognise the presence of conflict in the country heightens the risks of modern slavery, specifically forced and child labour. Although the DRC is generally considered a Conflict-Affected and High-Risk Area (CAHRA),⁷ our Kinsevere operations are located 1,500 kilometres away from the ongoing conflict in the Eastern DRC. However, we continue to closely monitor the conflict and assess the risks, including the potential

for modern slavery risks. We also continue to assess the potential risk that we may be directly linked to conflict through our supply chains, including our suppliers of minerals.

In Peru, we recognise that the complex social and geographical context in which our Las Bambas mine operates increases the potential for modern slavery risks. We are also aware of illegal mining activities on our concession and recognise the severity of the risks associated with illegal mining, including potentially the worst forms of child labour. Our Las Bambas site does not source copper from third parties and has strict traceability processes to ensure illegally mined copper does not enter our value chain.

Our Botswana operations were acquired in March 2024 and although Botswana is one of the countries with the lowest prevalence of modern slavery in Africa, we continue to assess the potential for modern slavery risks.

Overall, in terms of our operations, we consider the potential that we may cause or contribute to modern slavery risks to be low. This is due to the implementation of appropriate group-wide and site-level controls to identify, assess and address modern slavery risks, in line with our existing commitments. Our risk-based approach ensures our higher-risk sites undertake enhanced human rights due diligence (detailed in Our approach below).

We consider the risks to be higher in our supply chains where we are aware that we could potentially contribute to, or be directly linked to, modern slavery practices through our relationship with other entities. Through our desktop supply chain modern slavery risk assessment (supply chain assessment), we have considered the modern slavery risk profile of our tier 1 suppliers based on the country they are registered in and the category of products or services they supply to us.

⁵ Walk Free is a global organisation focused on the eradication of modern slavery in all its forms. The Walk Free Global Slavery Index 2023 estimates the prevalence of modern slavery (per 1,000 of the population) in countries our mining operations are in to be: Peru 7.1, Democratic Republic of the Congo 4.5, Botswana 1.8 and Australia 1.6.

⁶ [Australia: UN expert urges to strengthen due diligence among businesses and ensure equal protection of those vulnerable to contemporary forms of slavery | OHCHR](#)

⁷ The OECD defines CAHRAs as areas identified by the presence of armed conflict, widespread violence, or other risks of harm to people.

Modern slavery risk profile

Continued

We recognise that our tier 1 suppliers may have risks in their supply chains from sourcing raw materials, components or labour that extend beyond their country of registration. Our category analysis considers these potential risks and our supplier engagement approach ensures we work with our suppliers to understand the potential for risk beyond our tier 1 suppliers.

Our supply chain assessment identified categories in our supply chains that, due to their inherent characteristics (including their supply chain risks), are potentially at higher risk for modern slavery practices. The categories and their potential inherent risk factors are detailed in Table 5 below.

Table 5. Supply chain modern slavery risk categories

Category	Potential inherent risk factors
Logistics – road and sea transport	<ul style="list-style-type: none"> • Presence of labour contractors, recruiters or agents • Migrant workers • Remote conditions • Poor living and working conditions
Construction/mining services	<ul style="list-style-type: none"> • Presence of labour contractors, recruiters or agents • Short-term/temporary work • Layers of subcontracting • Remote sites • Significant cost/delivery pressures
Labour hire	<ul style="list-style-type: none"> • Short-term/temporary work • Excessive recruitment fees • Other workers' fees (i.e. accommodation and transport) • Layers of subcontracting • Strong pricing competition (where the cost of labour is the primary cost)
Support services (such as catering, cleaning and maintenance)	<ul style="list-style-type: none"> • Low-skilled workers • Manual labour • Short-term/temporary work • Hazardous work • Excessive working hours • Layers of subcontracting • Strong pricing competition (where the cost of labour may be the primary cost)
Rubber products – tyres and grinding media	<ul style="list-style-type: none"> • Products may be manufactured in or raw materials sourced from high-risk countries
Uniforms/PPE	<ul style="list-style-type: none"> • Products may be manufactured in or raw materials sourced from high-risk countries
Third-party mineral purchases (relevant for our Kinsevere site only)	<ul style="list-style-type: none"> • Products may be sourced from CAHRAs
Electronics	<ul style="list-style-type: none"> • Products may be manufactured in or raw materials sourced from high-risk countries
Renewables (including wind turbines and solar panels) and batteries	<ul style="list-style-type: none"> • Products may be manufactured in or raw materials sourced from high-risk countries

Modern slavery risk profile

Continued

Our supply chain assessment also considers the risks of sourcing directly from countries with a higher estimated prevalence of modern slavery. In 2024, we did not source from the top 10 countries with the highest estimated prevalence of modern slavery as identified by Walk Free's Global Slavery Index 2023.⁸

The top 10 countries we source from that have a comparatively higher estimated prevalence of modern slavery according to Walk Free's Global Slavery Index 2023 include India, Colombia, Lebanon, Peru, Indonesia, Mexico, Thailand, Laos, Zambia and Brazil.⁹

We recognise that country risk and category risk are not the only indicators of potential modern slavery risk. Specific suppliers owing to their practices, the presence of human rights allegations or absence of policies and processes, may also increase their modern slavery risk profile. We also take this into consideration when developing our risk-based approach.

See [Supply Chain Assessment](#) below for further information on our approach to identifying, assessing and addressing modern slavery risks in our supply chain.



⁸ The Walk Free Global Slavery Index 2023 identifies North Korea, Eritrea, Mauritania, Saudi Arabia, Türkiye, Tajikistan, United Arab Emirates, Russia, Afghanistan and Kuwait.

⁹ Sourcing from India, Colombia, Lebanon and Indonesia are for comparatively low-value purchases of consumables and services.

Our approach

We respect internationally recognised human rights and our approach is aligned with our commitment to implement the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs).

This approach is aligned with our membership of, and commitment to, the International Council on Mining and Metals (ICMM) Performance Expectations and the Voluntary Principles on Security and Human Rights. We also align our approach with the UN Global Compact Principles.

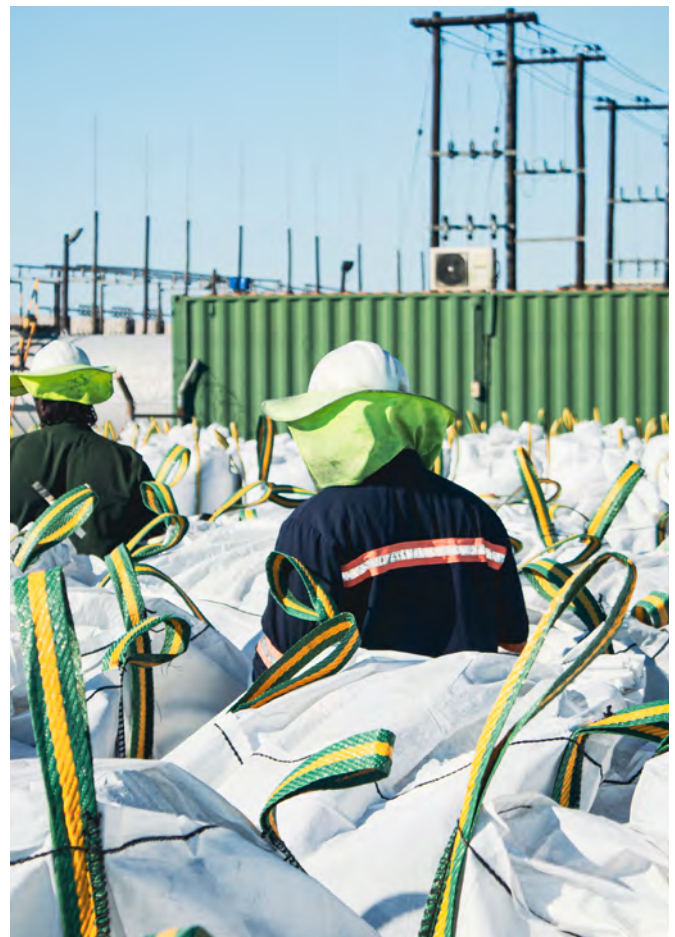


Governance

The Governance, Remuneration, Nomination and Sustainability (GRNS) Board Committee is accountable for the Company's sustainability performance. This includes health and safety, security, the environment, social performance, human rights and modern slavery, as well as other environmental, social and governance-related issues. More information on the MMG Sustainability Framework can be found in [MMG's 2024 Sustainability Report](#).

The Executive General Manager for Corporate Relations is accountable for human rights and modern slavery strategies in MMG. This role chairs the Code of Conduct and People Committee, which has been in place since 2015 and regularly reviews the modern slavery program of work.

We have regional human rights working groups (HRWGs) in place to support our modern slavery program of work. These HRWGs consist of representatives from Security, Social Performance, Legal, Human Resources, Operations, Supply Chain, Corporate Affairs and Security, Safety, Health, Environment (SSHE) functions. Our HRWGs continued to meet regularly and progress their work in 2024.

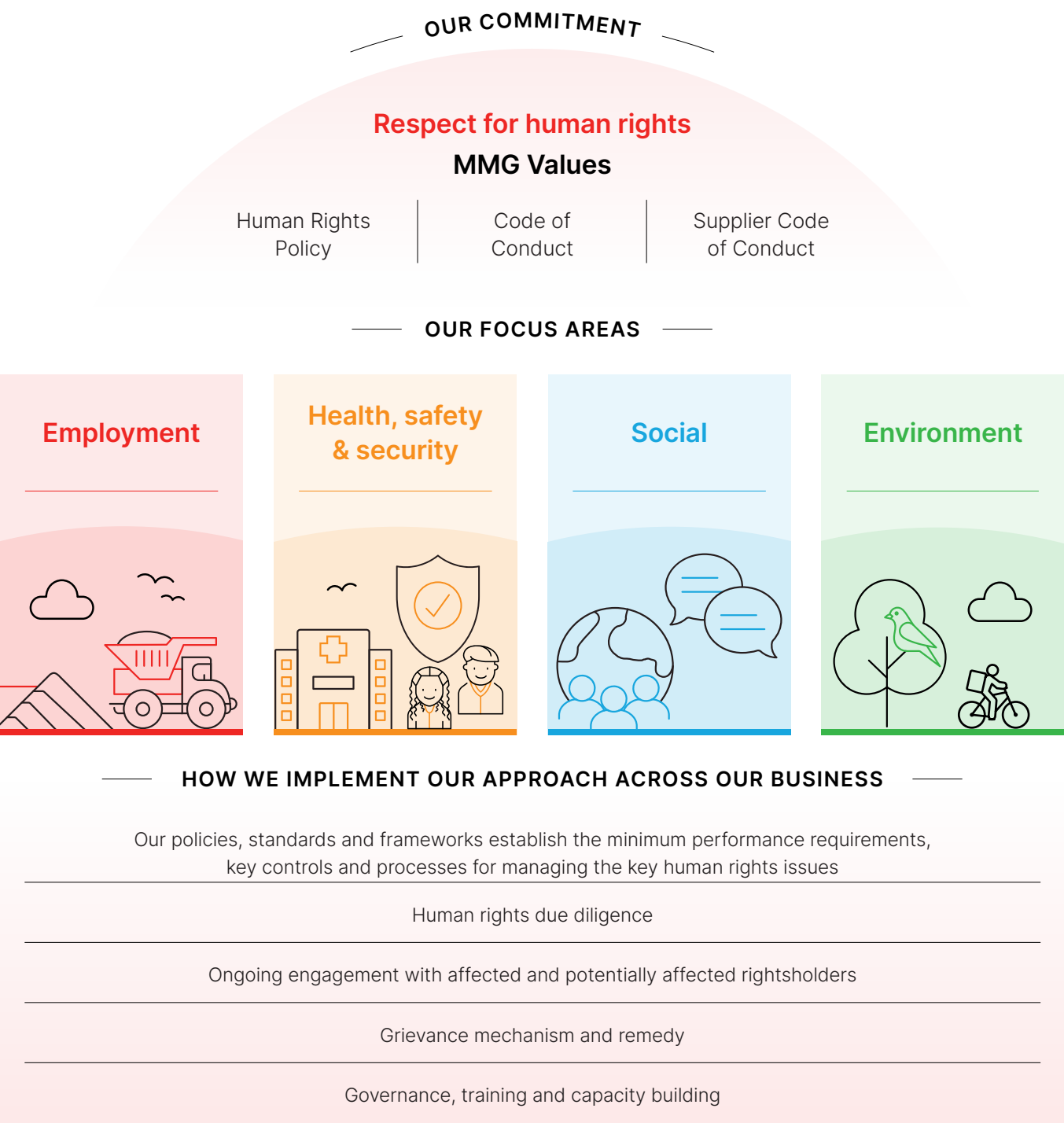


Our approach

Continued

Human Rights Framework

Our commitments and approach to human rights are embedded across our Human Rights Policy, Code of Conduct, Supplier Code of Conduct and other related policies, standards and frameworks that, together, constitute our Human Rights Framework.



Our approach Continued

Human Rights Policy

Our Human Rights Policy was reviewed in 2023 and the updated policy published in 2024. Our updated policy recognises a broader range of human rights issues that MMG could potentially impact, such as tailings-related impacts, the intersection of climate change and human rights, and the impact of conflict, including operating in or sourcing from CAHRAs. In relation to modern slavery, we broadened our approach to not only reject any form of slavery and forced or child labour, but to explicitly reference our commitment to respecting the labour rights of our employees and contractors. This includes rights relating to health and safety, non-discrimination and harassment, freedom of association, collective bargaining and working hours. Our updated policy also includes a commitment to conduct ongoing human rights due diligence to identify, prevent, mitigate and account for human rights, including modern slavery risks and impacts.

Our Human Rights Policy is foundational for MMG's policies, standards and frameworks on People, Supply, Security, Safety, Health, Environment and Community (SSHEC), Social Performance, Legal and Risk (as appropriate) that contain human rights commitments.

See our [Human Rights Policy](#).

Responsible Mineral Production and Sourcing Policy

Our Responsible Mineral Production and Sourcing Policy, first published in 2024, is aligned with our Human Rights Policy and commits to the responsible production and sourcing of minerals that respects human rights (including no tolerance for any form of forced or compulsory labour or the worst forms of child labour), follows ethical business practices, safeguards the environment and promotes economic development. Our approach is in line with the Organisation for Economic Co-operation and Development's (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We communicate our Responsible Mineral Production and Sourcing Policy to our mineral suppliers and other relevant suppliers as required.

See our [Responsible Mineral Production and Sourcing Policy](#).

Code of Conduct

Our Code of Conduct is the guide to business integrity for all MMG employees and emphasises our commitment to respecting human rights. All employees are expected to complete Code of Conduct training. We commenced a review of our Code of Conduct in 2024, to ensure it clearly defines our expectations for managing modern slavery risks.

See our [Code of Conduct](#).

Our approach Continued

Supplier Code of Conduct

Our Supplier Code of Conduct sets out MMG's minimum standards for suppliers (and their subsidiaries and subcontractors), including respecting human rights and managing modern slavery risks. We reviewed our Supplier Code of Conduct in 2023 and published our updated Supplier Code of Conduct in 2024. Our updates include strengthening our approach to modern slavery risk management and outlining the expectations for suppliers to:

- actively work to implement the UN Guiding Principles on Business and Human Rights
- take appropriate steps to verify the age of workers
- respect their workers rights to bargain collectively
- conduct due diligence aligned with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (relevant for suppliers of minerals)
- provide a grievance mechanism for their workers

Our updates also include links to MMG resources and external standards to support their implementation of the Supplier Code of Conduct.

As previously disclosed, we have processes in place to communicate and manage compliance with the Supplier Code of Conduct.

See our [Supplier Code of Conduct](#).

Human Rights Due Diligence Work Quality Requirement

We published our new Human Rights Due Diligence Work Quality Requirement (WQR) in 2024, to support the implementation of our Human Rights Policy commitment to conduct ongoing human rights due diligence across the business. The WQR is aligned with the [ICMM Human Rights Due Diligence Guidance document](#) but is specific to our requirements and includes a section dedicated to conducting supply chain human rights due diligence. We will continue to embed our WQR throughout our operations in 2025.

Other internal policies and standards that are relevant for identifying, assessing and addressing modern slavery risks include our Security Safety Health Environment and Community (SSHEC) Policy, People Policy and Standard, Social Performance Standard, Risk and Assurance Standard, Anti-Corruption Standard, Supply and Insurance Standard and Stakeholder Grievance Management Work Quality Requirement.

Identifying, assessing and taking action on modern slavery risks

Our business conducts an annual material sustainability issue assessment to help identify and understand the relative importance of specific Environmental Social and Governance (ESG) risks.

We have identified human rights as a material theme through material topics, including supply chain resilience, culture of care, capability and people development, and local communities and Indigenous peoples.

We integrate human rights considerations into our employment and third-party onboarding processes, risk-analysis activities, supply chain management, security management, community engagement, social investment and grievance mechanisms.

We also monitor external resources, such as the Business and Human Rights Resource Centre, Walk Free and the International Labour Organization Forced Labour Observatory, to continuously inform our modern slavery risk assessments. In our higher-risk sites in the DRC and Peru and in line with our commitment to the Voluntary Principles on Security and Human Rights, we regularly monitor and update our local conflict analysis.

Operations

We use a number of approaches to identify and assess modern slavery risks in relation to our operations, including our risk management processes, recruitment and people management processes and grievance mechanisms.

Our Risk Management Standard defines the approach to identify and manage risks, including ESG risks. Sites are required to develop a risk register in accordance with requirements set out in the Risk Management Standard and to implement controls and actions to manage the risks.

Our People Standard defines the overarching approach to recruiting, onboarding and managing MMG employees and contractors. Sites are also required to comply with the relevant region-specific recruitment procedure. This standard is supported with detailed work quality requirements, systems and processes to ensure global standards and local requirements are met.

We also regularly assess grievance trends to determine the root cause of issues that underly grievances to support ongoing human rights due diligence processes, including managing and preventing similar grievances from taking place in the future.

Our Las Bambas operation recognises that the social and geographical context in which it operates is complex and identified the need to draw on external independent human rights expertise to conduct a Human Rights Impact Assessment (HRIA). In 2024, Las Bambas appointed an internationally recognised human rights consultancy to conduct the HRIA. The HRIA will identify and assess actual and potential human rights (including modern slavery) risks and impacts across Las Bambas' operations and supply chains (tier 1 suppliers). The HRIA commenced in October 2024 and will continue to progress throughout 2025.

In 2025, we plan to undertake a group-wide human rights saliency assessment using a methodology informed by the UNGPs. The assessment seeks to identify the most severe human rights issues, based on the scale, scope and irremediability of the impact. The approach would be across the whole value chain and consider all human rights impacted by our activities or business relationships.

Supply chain

We screen new suppliers and regularly assess our existing suppliers for potential and actual modern slavery risks. We incorporate the findings from our supply chain assessment to implement a risk-based approach to prioritise suppliers in high-risk categories and countries for further due diligence.

Supply chain assessment

In late 2024, we reviewed our supply chain assessment of all our tier 1 suppliers, taking into consideration the external developments and the internal findings from our due diligence reviews. Our assessment is focused on prioritising the suppliers with the most severe modern slavery risks. We also take into consideration the likelihood of the risk occurring in our supply chains and the leverage we have to influence the suppliers' practices to guide our prioritisation approach.

Identifying, assessing and taking action on modern slavery risks

Continued

We take targeted action based on our supply chain assessment, including direct engagement with suppliers, mapping supply chains, assessing suppliers' modern slavery statements and requesting completion of our supplier self-assessment questionnaire (supplier questionnaire). We continue to monitor and assess the risks to inform our supply chain assessment process.

Table 6 below provides a summary of the key findings from our due diligence activities and our planned actions for 2025 for our Australian operations.

Table 6. Due diligence findings and planned actions for our Australian operations

Category	Key due diligence findings	Planned action for 2025
Logistics – road	A local road transport supplier does not have specific policies and processes in place to identify, assess and address modern slavery risks.	Undertake a capacity building initiative with the supplier to embed an appropriate approach to manage modern slavery risks.
Labour hire	<ul style="list-style-type: none"> • Our key labour hire providers have processes in place to ensure workers do not pay recruitment fees directly or indirectly. • We cross checked our labour hire providers against the database of labour providers using the PALM visa scheme¹⁰ and did not find evidence of our current labour hire providers using the PALM visa scheme. • Our Tasmanian-based labour hire providers are not subject to any specific labour hire regulation. 	<ul style="list-style-type: none"> • Target our small-to-medium local labour hire providers and Tasmanian-based providers for further due diligence and capacity building. • Continue to monitor potential risks associated with various visa schemes. • Continue to conduct awareness raising initiatives with our employees.
Support services (catering, cleaning and maintenance)	A review of our site management services provider identified strong controls and process in place. We also conducted due diligence on their key sub-contractors.	Continue to engage with our supplier through the quarterly review process.
Rubber products – Tyres	Our tyre supplier sources rubber from Indonesia, Thailand and West Africa and has a modern slavery audit program in place.	Continue to monitor our tyre supplier's rubber tracing initiatives and ensure they are committing to ongoing improvement.
Uniforms/PPE	A review of our uniform/PPE suppliers identified strong modern slavery risk controls in place, including that international suppliers must provide evidence of a Sedex Members Ethical Trade Audit (SMETA) audit report.	Continue to engage with our suppliers on audit and supply chain transparency initiatives.
Renewables	Due diligence conducted on a potential wind turbine supplier identified that the supplier has a number of controls in place to manage modern slavery risks, including identification of supply chain categories with inherently high modern slavery risks.	As our renewable energy projects progress we will continue to conduct due diligence to increase our understanding of the risk profile of our active projects.

¹⁰ [Current employers | PALM scheme](#)

Identifying, assessing and taking action on modern slavery risks

Continued

Supplier self-assessment questionnaire and supplier engagement

In 2024, our Australian Supply Chain team continued to use our supplier questionnaire to identify potential modern slavery risks and opportunities to strengthen our suppliers' approach. As previously disclosed, we have processes in place to support our Supply Chain team members to take action on potential risks and strengthen supplier practices.

The most common issue we identified with our suppliers was in their approach to responding to cases of actual or suspected modern slavery. A few of our suppliers said they would terminate the supply relationship. In these cases, we have engaged directly with the suppliers to ensure they understand the importance of aligning their approach with the Commonwealth Modern Slavery Act Guidance for Reporting Entities (May 2023), specifically Appendix 3 that sets out key recommendations to help guide their responses, including ensuring their actions are always in the best interests of the suspected victim or victims.

Supplier screening

Our supplier screening process for all new suppliers includes specific questions in relation to the assessment of modern slavery compliance. The aim of the screening process is to check for any human rights and other ethical violations, as well as compliance with the MMG Supplier Code of Conduct.

As previously disclosed, our supplier engagement and contract award process involves a comprehensive assessment across a range of criteria.

Our supplier screening processes for our Kinsevere operation is conducted in line with our Responsible Mineral Production and Sourcing Policy. Commencing in 2025, for any red flag locations, suppliers or circumstances, the operation will undertake on-the-ground assessments to identify risks of contributing to conflict or serious abuses.

Contract terms and conditions

Our standard contract templates have a modern slavery clause. The clause requires compliance with modern slavery laws in the applicable jurisdictions and prohibits modern slavery practices (as defined under Australian legislation) more generally. The clause also requires our suppliers to identify and address modern slavery in their operations and supply chains.

The clause, along with the Supplier Code of Conduct, provides MMG with the ability to review individual suppliers' compliance with the Supplier Code of Conduct and applicable modern slavery laws.

Training

We are committed to improving the capacity of our teams to identify, assess and address the risks of modern slavery in our operations and across our value chain.

During 2024

We provided mentoring and coaching for members of our Australian Supply Chain team to identify, assess and address potential modern slavery risks for suppliers.

Members of our Las Bambas Human Rights Working Group have participated in ICMM training on human rights due diligence.

We conducted general and issue-specific human rights awareness raising for employees.

All employees were required to complete anti-corruption training.



Grievances and remedy

We are committed to providing effective grievance processes to enable our stakeholders to report instances of improper conduct without fear of intimidation or reprisal.

We provide for or cooperate in remedy where we identify that we have caused or contributed to an adverse human rights impact, and we consider the role we may play in remediation where we are directly linked to an adverse human rights impact.

We have several mechanisms for our communities, employees, contractors and suppliers to raise grievances, including actual or suspected human rights grievances, breaches of our Code of Conduct or other company policies.

Our Whistleblower Framework provides a mechanism for grievances to be reported through our [Whistleblower Service](#). The Whistleblower Service applies across the MMG Group and is an independent, confidential hotline service for reporting unacceptable conduct, including modern slavery. Our Code of Conduct and Supplier Code of Conduct reference our Whistleblower Service.

In 2024, we were not aware of any grievances related to modern slavery being raised through our Whistleblower Service.

All our sites are also required to have a site-specific grievance mechanism in line with our MMG Stakeholder Grievance Management WQR. This WQR includes processes for identifying, assessing and addressing human-rights-related grievances, including modern slavery. Each of our mine sites also has an external facing [Stakeholder Feedback Portal](#) to allow stakeholders to anonymously lodge and track grievances directly into our system.



In 2024, we received a total of 256 grievances across our sites' grievance mechanisms. The majority of these relate to local supply, damage to private property, environment and local employment. We were not aware of any of the grievances being related to working conditions or modern slavery. However, we continue to assess our grievance trends to determine whether there are any underlying issues that could potentially contribute to modern slavery risks.

For more information on our grievances related to the MMG Group, refer to our [2024 Sustainability Report](#).

Assessing effectiveness



We continue to assess the effectiveness of our approach by regularly reviewing our controls and processes, tracking the close out of grievances, tracking progress against our modern slavery action plan, tracking the close out of gaps identified in supplier practices and through our assurance program.

In cases of high-risk operations or supply chains, we may also draw on independent expertise to assess the effectiveness of our approach.

Throughout 2024, our Australian Operations Supply Chain team through their supplier engagement continued to learn more about their suppliers' practices, including areas of good practice and where they may need to strengthen their suppliers' approach. In cases where gaps were identified with suppliers' practices, they were tracked through our action plan and closed out within the agreed timeframe.

The HRIA process our Las Bambas operation has committed to will also assess the effectiveness of Las Bambas' measures to address the human rights (including modern slavery) risks and impacts through prevention, mitigation and remediation. In 2024, Las Bambas also appointed an independent human rights advisory group, comprised of five international human rights experts, to provide oversight and technical support to the HRIA process and assist Las Bambas in setting and implementing an action plan.

In 2024, our Kinsevere operations conducted a thorough review of their processes for sourcing minerals. In late 2024, they commenced the Responsible Mineral Initiative's third-party responsible sourcing audit. The audit will be finalised in 2025.

Our internal assurance program focuses on verifying that the critical controls required to manage material risk events, including modern slavery risks, are implemented and effective. We apply a 'Three Lines of Defence' approach to assurance.

The First Line of Defence involves standard implementation by the business. For example, our procurement teams are responsible for identifying and managing risks in the supply chain.

The Second Line of Defence is undertaken by Group Functions. It involves periodic review of the control framework for modern slavery risk management.

The Third Line of Defence is MMG's internal audit program, which tests the design and effectiveness of our approach and the effectiveness of the first and second lines of defence. Internal audit also reviews key process areas highlighting good practices and areas that management may consider for further improvement. The internal audit program is managed by MMG's Audit and Risk team.

Communication, engagement and disclosure

MMG operates as an integrated group of companies with overarching policies, systems and processes that are designed to be applied to all companies within the MMG Group.

MMG’s federated structure is designed so that our Head Office performs governance and compliance functions, as well as the implementation of corporate initiatives. Our regional and site-based teams across the MMG Group are engaged through our assurance program, material sustainability issue assessment, modern slavery risk assessments and training initiatives.

Accordingly, this Modern Slavery Statement was prepared by a cross functional Head Office team, including Sustainability, Supply Chain, Legal, Human Resources and Corporate Affairs in consultation with each of the MMG Reporting Entities and subsidiaries in the MMG Group, including our regional and site-based teams.

Prior to Board review and approval, this was reviewed by each member of MMG’s Code of Conduct and People Committee comprising:

- | | |
|---|---|
| 1 | Executive General Manager Corporate Relations as the representative member of the Executive Committee |
| 2 | General Counsel |
| 3 | General Manager of People |
| 4 | Legal Counsel |
| 5 | Head of Organisational Development and Talent |
| 6 | Head of Sustainability |
| 7 | Head of Social Performance |

We disclose relevant policies and standards on our corporate website and showcase case studies and our work in corporate social responsibility, sustainability and human rights on our [We Mine for Progress](#) website.

We disclose human rights relevant reporting, including our Annual Report, Sustainability Report and Voluntary Principles Initiative Report. We will also disclose our Public Due Diligence Report in 2025, in line with our Responsible Mineral Production and Sourcing Policy.

This Statement has been endorsed by the CEO, MMG’s Executive Committee and the Governance, Remuneration, Nomination and Sustainability Board Committee.

Our approvals

This Modern Slavery Statement was approved by the principal governing body of MMG Limited as defined by the *Modern Slavery Act 2018* (Cth) ('the Act') on 20 May 2025.

This Modern Slavery Statement is signed by a responsible member of MMG Limited as defined by the Act:

A handwritten signature in black ink, appearing to read 'Ivo Zhao', with a long horizontal stroke extending to the right.

Ivo Zhao
CEO MMG Limited

Appendix one

Modern slavery action plan tracking

Area of focus	2024 key initiatives	2025 planned key initiatives
Governance and measuring effectiveness	<ul style="list-style-type: none"> Las Bambas' operations commenced their HRIA (Page 14) 	<ul style="list-style-type: none"> Las Bambas' HRIA to be finalised and action plan to be developed (Page 19) integrate site-level action plans into our governance framework (previously a 2024 initiative)
Setting expectations (internal and external)	<ul style="list-style-type: none"> published our updated Human Rights Policy and Supplier Code of Conduct (Pages 12–13) published our Responsible Mineral Production and Sourcing Policy (Page 12) 	<ul style="list-style-type: none"> continue to work to align our standards with our Human Rights Policy continue to engage with our suppliers on our Supplier Code of Conduct and Responsible Mineral Production and Sourcing Policy (as required)
Embed due diligence	<ul style="list-style-type: none"> embedded the supplier self-assessment questionnaire in the procurement process (Page 16) published our Human Rights Due Diligence Work Quality Requirement (Page 13) 	<ul style="list-style-type: none"> conduct our group-wide human rights saliency assessment to identify our salient human rights issues (Page 14) embed our Human Rights Due Diligence Work Quality Requirement (Page 13)
Training, awareness raising and guidance material	<ul style="list-style-type: none"> general awareness raising conducted with the Australian operations' supply chain (Page 17) 	<ul style="list-style-type: none"> conduct training and awareness raising on human rights issues, including modern slavery, through our saliency assessment conduct training and awareness raising with a focus on labour hire risks (Page 15)
Grievance mechanisms and remediation	<ul style="list-style-type: none"> updated our Supplier Code of Conduct with an expectation for suppliers to implement effective grievance mechanisms (Page 13) engaged with suppliers on the expected approach for responding to suspected or actual cases of modern slavery (Page 16) 	<ul style="list-style-type: none"> continue to assess grievance mechanisms effectiveness for identifying and addressing human-rights-related complaints (including modern slavery)

