



Modern Slavery Policy

Policy Number: P15.1

1. Purpose

1.1. The purpose of this Modern Slavery Policy (the “**Policy**”) is to affirm the position of Metro Mining Limited (“**Metro**”) in its commitment in the global fight against modern slavery and human trafficking. Metro understands the devastating impact of these practices on individuals and communities worldwide. This Policy provides a clear framework for the prevention of these practices in all aspects of Metro’s operations in accordance with *Modern Slavery Act 2018* (Cth).

2. What is modern slavery

2.1. The *Modern Slavery Act 2018* (Cth) defines modern slavery to include eight types of serious exploitation:

- a) trafficking in persons;
- b) slavery;
- c) servitude;
- d) forced marriage;
- e) forced labour;
- f) debt bondage;
- g) deceptive recruiting for labour or services; and
- h) the worst forms of child labour.

3. Scope

3.1. This Policy applies to all persons working for Metro, or Metro’s behalf in any capacity, including employees, agents, directors, contractors, consultants, suppliers and business partners.

4. Our commitment

4.1. Metro is guided by its commitment to equity and social justice, diversity, inclusion and respect for human rights. Metro will take action to ensure that all forms of modern slavery in its operations and supply chain are identified, evaluated and managed.

5. Combatting modern slavery

5.1. Metro acknowledges that that modern slavery is likely to arise when:

- a) where workers have fewer protections through inadequate laws and regulations, weak or non-existent enforcement, and

poor business and government accountability;

- b) where there are high levels of poverty among workers;
- c) where there is widespread discrimination against certain types of worker (e.g women and ethnic groups);
- d) where there is widespread use of migrant workers;
- e) in certain geographical locations with the heightened risk of modern slavery practices, such as conflict zones; and
- f) in some specific high-risk industries.

5.2. Metro will ensure identification and mitigation of modern slavery risks are part of organisational safeguarding mechanisms. These include:

- a) conducting an analysis of Metro’s operations to ensure that no area of business is engaged in modern slavery practices;
- b) ensuring all potential suppliers, understand Metro’s Modern Slavery Policy and provide Metro with their Modern Slavery policy and/or statements as part of the procurement process responses;
- c) incorporating modern slavery prevention provisions within Metro’s contracts with suppliers and third-party contracts to be reviewed by Metro’s in-house legal team to ensure modern slavery risks are identified and managed; and
- d) providing appropriate training to Metro employees on modern slavery and human trafficking.

6. Roles and Responsibilities

Metro Board of Directors:

- Aligns Metro’s activities with this policy and approves changes to this policy.

CEO/Executive Leadership Team:

- Implements this policy and fosters a culture that values identification, prevention, manages risk and ensures all employees receive appropriate training.



General Counsel/Company Secretary:

- Ensure compliance to the Policy;
- Ensure regular reviews of the Policy are conducted;
- Report any complaints about Modern Slavery Practices to the Board; and
- Ensure all Metro’s contracts align with the Policy.

GM – People and Culture:

- Implement practices that guard against modern slavery.

All employees, contractors, agents:

- Understand and adheres to this Policy, reports concerns, and participates in training.
- Report any known breaches in the Policy through their immediate manager, General Manager – People and Culture, Company Secretary, or in accordance with the Whistle-blower Policy.
- Promote Metro’s values and speak up regarding concerns about modern slavery in any part of Metro’s operations or supply chain.