

2024 MODERN SLAVERY STATEMENT



1. Introduction

1.1 Acknowledgement of Country

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 Yirganydji 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.

1.2 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 2024 (FY2024).

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).

1.3 Our approach

We strive for excellence in both our operational and sustainable performance to create value for our host communities, shareholders and customers. 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.

2. Modern Slavery Act 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:

Mandatory Criteria	Page number/s
1. Identify the reporting entity	1
2. Describe the reporting entity's structure, operations and supply chains	2-4
3. Describe the risks of modern slavery practices in the operations and supply	4-5
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	5-7
5. Describe how the reporting entity assesses the effectiveness of its actions	7
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)	7
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant	7-8

3. Overview of structure, operations and supply chain

3.1 Business overview

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.

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

Our 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.

3.2 Operations

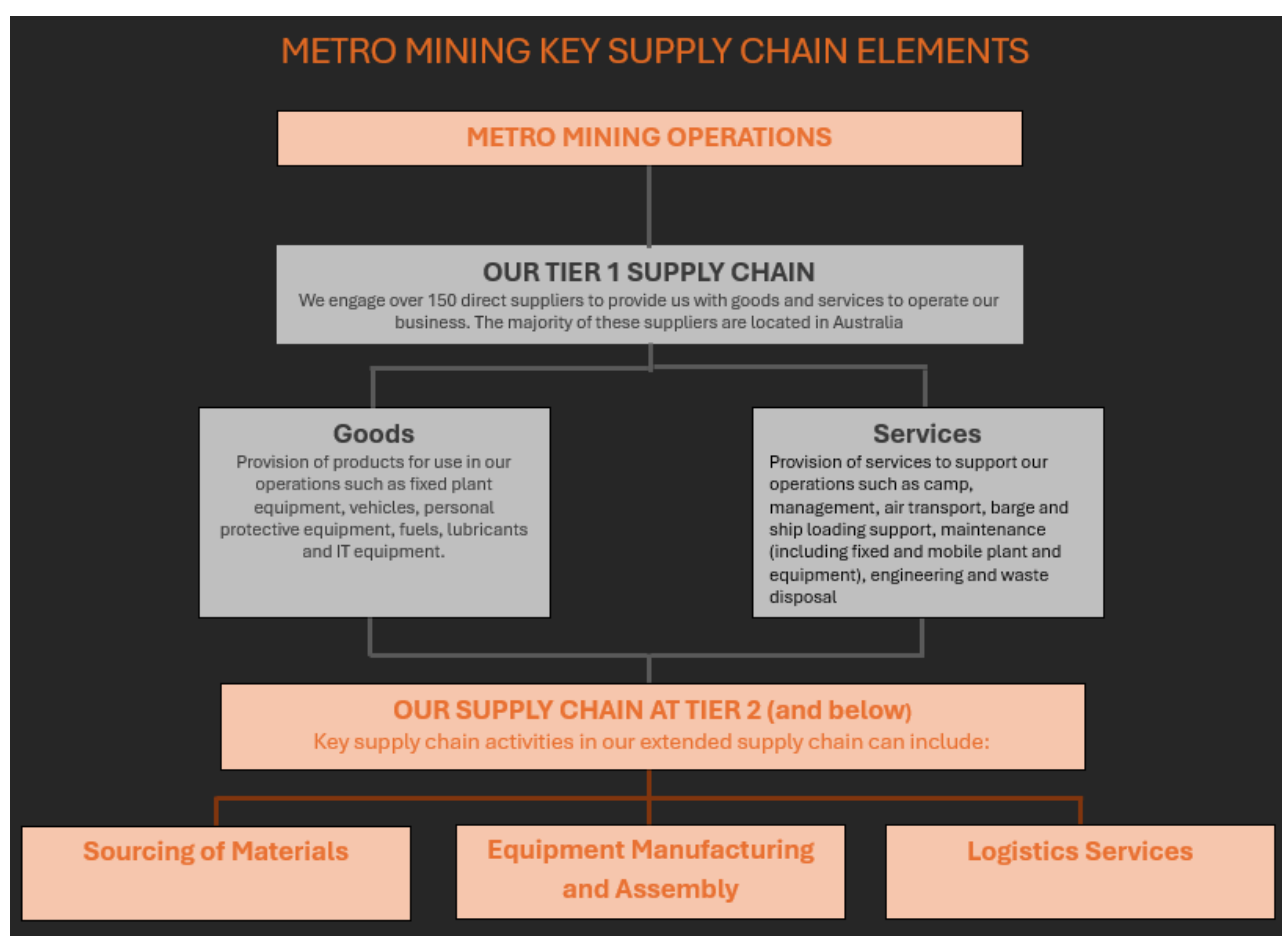
Metro Mining owns 100% of the Metro Bauxite Hills Operation, which is located 95 kilometres north of Weipa in Queensland's Weipa Bauxite region. The Bauxite Hills Mine has an estimated Reserve of 77.7 million tonnes (Mt) and a total Resource of 114.4 Mt and has been operating since April 2018. Bauxite Ore from the mine is predominantly shipped to meet China's growing bauxite market; where Cape York bauxite is well known and highly regarded. In 2024 we also expanded our customer base to include the United Arab Emirates.

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 transshipment contractor's floating crane.

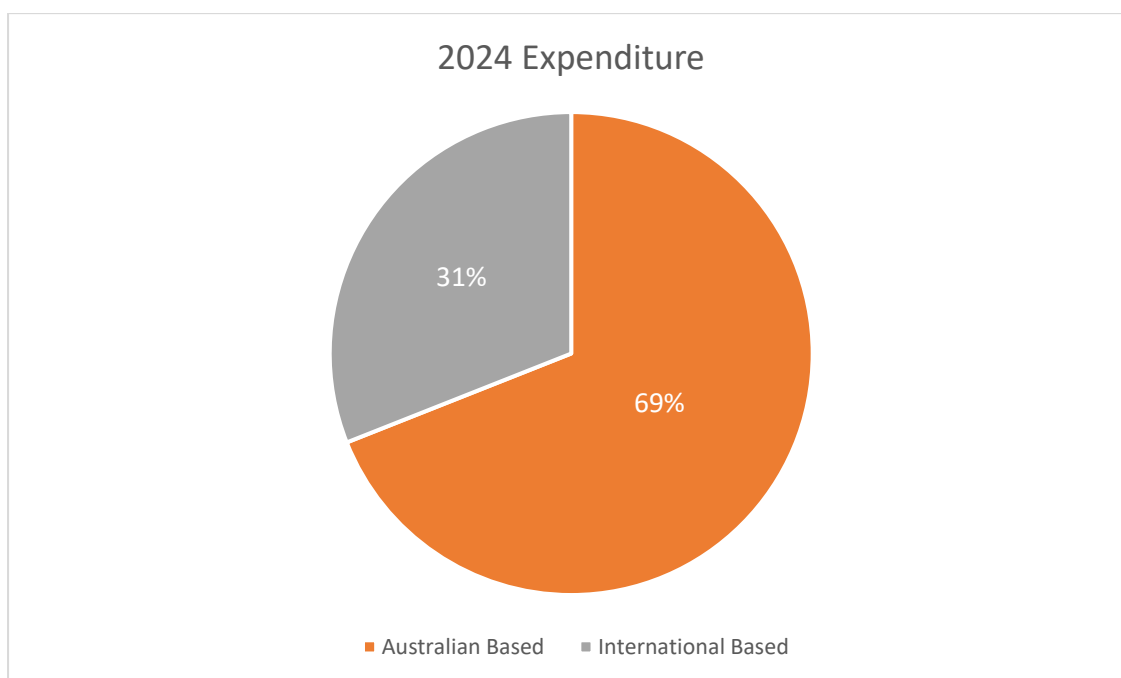
As of December 2024, Metro Mining directly employed 235 permanent and maximum term employees and with our contractors, engaged a total workforce of 419 people across our operations.

3.3 Supply chain

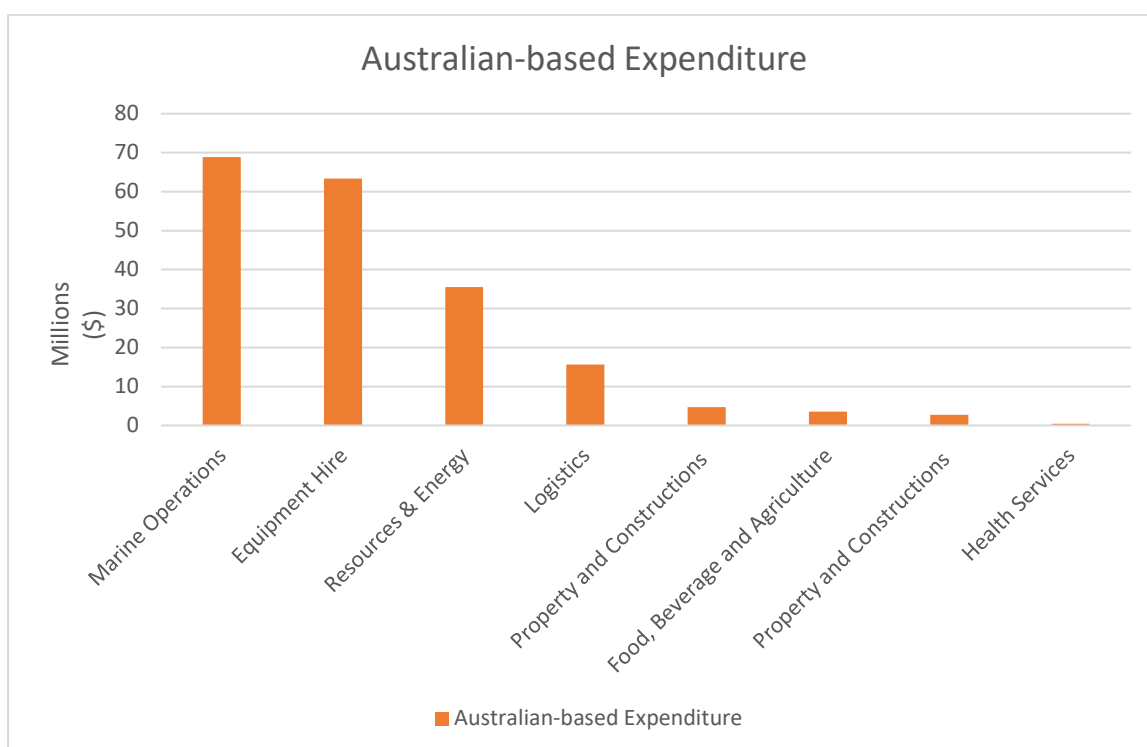
Our supply chain relates to the mining and shipping of bauxite to China and the United Arab Emirates. This includes suppliers of mining equipment (trucks, mobile plant, vehicles, fixed plant, etc), telecommunications, clothing, tools, personal protective equipment, etc. Certain services such as transshipping (excluding those that are provided by our own transhipper, Ikamba), 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 2024 Metro Mining's expenditure on goods and services totalled \$274.6M. 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.



Our further breakdown of our Australian-based expenditure is provided below:



4. 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 labour; debt bondage; forced marriage 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 risks in 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 and to the United Arab Emirates 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;
- the procurement of food, beverage and agriculture services;
- the procurement of resources and energy (eg: diesel fuel);
- procurement of subcontractors outside of Australia that provide labour on our assets.

5. Modern slavery assessment and risk mitigation actions

We take a proactive approach to identifying, managing and mitigating modern slavery risks. 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 risks are identified and are appropriately 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.

During 2024 we also undertook the following additional activities in furtherance of our commitment to ensure that any form of modern slavery in our operations and supply chain is identified, evaluated and managed:

- establishment of a modern slavery working group;
- a comprehensive review of our supply chain to ensure we had identified our key suppliers and all material modern slavery risks;
- a review of the Modern Slavery Statements Register to identify which of our key suppliers had submitted statements in order to understand in more detail the modern slavery risks associated with their operations;
- a Modern Slavery Policy was developed and approved by the Board (available for review here: <https://metromining.com.au/wp-content/uploads/2024/12/P15.1-Modern-Slavery-Policy-14112024.pdf>);
- consolidation of our approach to the procurement of consumables (eg: personal protective equipment (PPE), uniforms, oils and lubricants) with a single Australian-based supplier with ethical sourcing and procurement practices.

6. 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 risks, including the following:

1. Metro Mining Values
2. Modern Slavery Policy
3. ESG Policy
4. Whistleblower Standard
5. People Policy
6. Anti-Bribery and Corruption Policy.

Our policies are available for review on our website: <https://metromining.com.au/company/corporate-governance/>.

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.

7. 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 2024, 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.

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set out ourselves annual goals to reach (which are detailed under section 9 below) so that we can look back and assess the effectiveness of our approach and inform our path forward.

8. Consultation

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

9. 2025 activities

As highlighted above, continuous improvement is important to manage and mitigate the risk of modern slavery. Our 2025 activities to date include the expansion of our modern slavery education by including all Metro employees with specific training and updates in the modern slavery risk space and changes in legislation in our annual training and awareness education schedule. We are also in the final stages of developing a suite of documents to further strengthen our governance framework including a Responsible Sourcing Policy, Modern

Slavery Response Plan, Supplier Code of Conduct and Procurement Policy. Over the remainder of 2025, we will also endeavour to obtain a greater understanding of our expanding supply chain through a detailed analysis of our major suppliers, which in turn will continue to assist in identifying new and expanded areas of heightened risk of modern slavery for closer oversight and management.

10. Feedback

We value all feedback on the content of this Statement, please visit the Metro Mining website, www.metromining.com.au, to provide feedback or request additional information.

11. Approval of Statement

This Statement has been approved by the Board of Metro Mining as the parent entity on 24 June 2025.

This Statement is signed by Simon Wensley in his role as the CEO and Managing Director of the parent entity on 24 June 2025.

A handwritten signature in black ink, appearing to read "Simon Wensley".

Simon Wensley
CEO and Managing Director
Metro Mining Limited