

# 2024 MODERN SLAVERY STATEMENT

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Surface drilling at the Federation Project

Cover: Exploration Geologist, Dinesh Shrethra

# ABOUT THIS STATEMENT

This Modern Slavery Statement (**Statement**) has been prepared by Aurelia Metals Limited (ACN 108 476 384) (**Aurelia**) in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting period 1 July 2023 to 30 June 2024. This Statement describes the risks of modern slavery in the operations and supply chains of Aurelia and its subsidiaries, and includes information about actions taken to address those risks.

This Statement complies with the mandatory reporting criteria contained in the Act:

MANDATORY CRITERIA	PAGE(S)
1 Identify the reporting entity	3
2 Describe the structure, operations and supply chains of the reporting entity	6-7 and 9-10
3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	11-13
4 Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	14-15
5 Describe how the reporting entity assesses the effectiveness of such actions	16
6 Describe the process of consultation with any entities that the reporting entity owns or controls	18
7 Include any other information that the reporting entity, or the entity giving the statement, considers relevant	4-5, 8 and 17

This Statement covers the activities of Aurelia and its seven wholly owned subsidiaries:

- 1) Defiance Resources Pty Ltd (ACN 119 700 220)
- 2) Hera Resources Pty Ltd (ACN 138 992 999)
- 3) Nymagee Resources Pty Ltd (ACN 154 131 138)
- 4) Peak Gold Asia Pacific Pty Ltd (ACN 103 879 054)
- 5) Peak Gold Mines Pty Ltd (ACN 001 533 777)
- 6) Dargues Gold Mine Pty Ltd (ACN 117 848 790)
- 7) Big Island Mining Pty Ltd (ACN 112 787 470)

All references to our, we, us or Aurelia refer to Aurelia Metals Limited and its subsidiaries. All references to year are to the financial year ended 30 June 2024 unless otherwise stated.

This Statement has been approved by the Board of Directors of Aurelia.

## ACKNOWLEDGEMENT

Aurelia acknowledges the First Nations peoples and recognises their continued connection to the land, waters and environment. We value the role that First Nations peoples have within our business and the communities in which we operate. We extend this recognition and our respect to First Nations peoples and communities globally.

## FEEDBACK

We value all feedback. Please provide any comments or queries on this Statement to [office@aureliametals.com.au](mailto:office@aureliametals.com.au).



# MESSAGE FROM THE MANAGING DIRECTOR AND CHIEF EXECUTIVE OFFICER



**AT AURELIA, WE ARE COMMITTED TO OUR VALUES,  
WHICH HELP US REALISE OUR PURPOSE TO BE A  
DEVELOPER AND OPERATOR OF CHOICE FOR BASE  
METALS THAT POWER THE FUTURE.**

As the Managing Director and Chief Executive Officer of Aurelia, I am committed to ensuring that our company upholds the highest standards of ethical conduct and transparency in all our operations. Our Value of *Care* governs our approach to maintaining responsible and transparent supply chains and ensuring all our business practices are free from modern slavery.

In FY24, we embarked on a new strategic direction at Aurelia. By building on our momentum from the past two years, we focused on:

- ♦ safely delivering operational excellence and lowering unit costs
- ♦ pursuing near-term growth projects
- ♦ safely extracting as much cash from Dargues as it transitioned to final production and closure
- ♦ optimising the Cobar Basin by taking advantage of our infrastructure assets and highly prospective geology.

Our steadfast commitment to safeguarding the health, safety and wellbeing of our workforce remains unwavering, including through the management of modern slavery risks.

This, our fifth Modern Slavery Statement, highlights actions we have put in place in FY24 and includes our roadmap for the future.

In FY25, we will continue to embed robust policies and procedures that mitigate modern slavery risks and further embed measures and controls to improve the effectiveness of our actions in this space. We will also continue to work with our business partners to build their capacity to manage modern slavery and labour exploitation risks.

A handwritten signature in black ink, appearing to read 'Bryan Quinn', written over a horizontal line.

Bryan Quinn  
Managing Director and Chief Executive Officer



# OUR FY24 MODERN SLAVERY SNAPSHOT

Supplier onboarding and maintenance system implemented to manage modern slavery data collection



89% of the workforce completed the standalone modern slavery training



98%

of Aurelia's suppliers are Australian-based (Tier 1) suppliers

Aurelia's modern slavery risk assessment reviewed and updated



37% of all goods and services procured locally



Meetings with three major suppliers with higher modern slavery risks to understand their management and approach to modern slavery risks

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Modern Slavery incidents reported

# WHAT WE DO

Aurelia is an Australian mining and exploration company with two operating mines and two development projects in New South Wales.

## OPERATIONS

The **Peak Mine** comprises two separate underground polymetallic mines and an 800 thousand tonne per annum (ktpa) base metals and gold processing plant. Peak is in the northern Cobar Basin, south of Cobar, a town in the Central West region of New South Wales.

The **Dargues Mine** was a gold-mining and milling operation in the Southern Tablelands region of New South Wales, approximately 60 kilometres (km) south-east of Canberra. In early FY25, mining operations at the Dargues Mine ceased and the site transitioned to rehabilitation and closure.

The **Hera Mine** – also located in the Cobar Basin approximately 100km south-east of Cobar – ceased mining activities in March 2023 and the surface facilities (including processing plant) have been placed into care and maintenance.

## PROJECTS

The **Federation Project**, located approximately 10km south of our Hera site, is one of the highest-grade base metal development projects in Australia. During FY24, the Federation Project was under construction and was officially opened in September 2024.

The **Great Cobar Project** involves the development of a satellite base metals and gold deposit, north of, and accessible from,

the New Cobar mining complex at Peak. Aurelia has prioritised development of the Federation Project and intends to commence mining activities at Great Cobar after Federation starts production.

## EXPLORATION

We also hold several exploration licences and undertake exploration activities surrounding our existing mining and development operations.

## PEOPLE

As at 30 June 2024, Aurelia and its subsidiaries had 322 employees and 251 contractors.

## RESULTS

In FY24, Aurelia generated revenue of approximately A\$310 million and produced the following gold and base metal quantities<sup>1</sup>.

KEY METRIC*	UNIT	FY24 PRODUCTION
Gold	oz	65,315
Silver	oz	316,020
Copper	t	2,159
Lead	t	18,671
Zinc	t	16,847

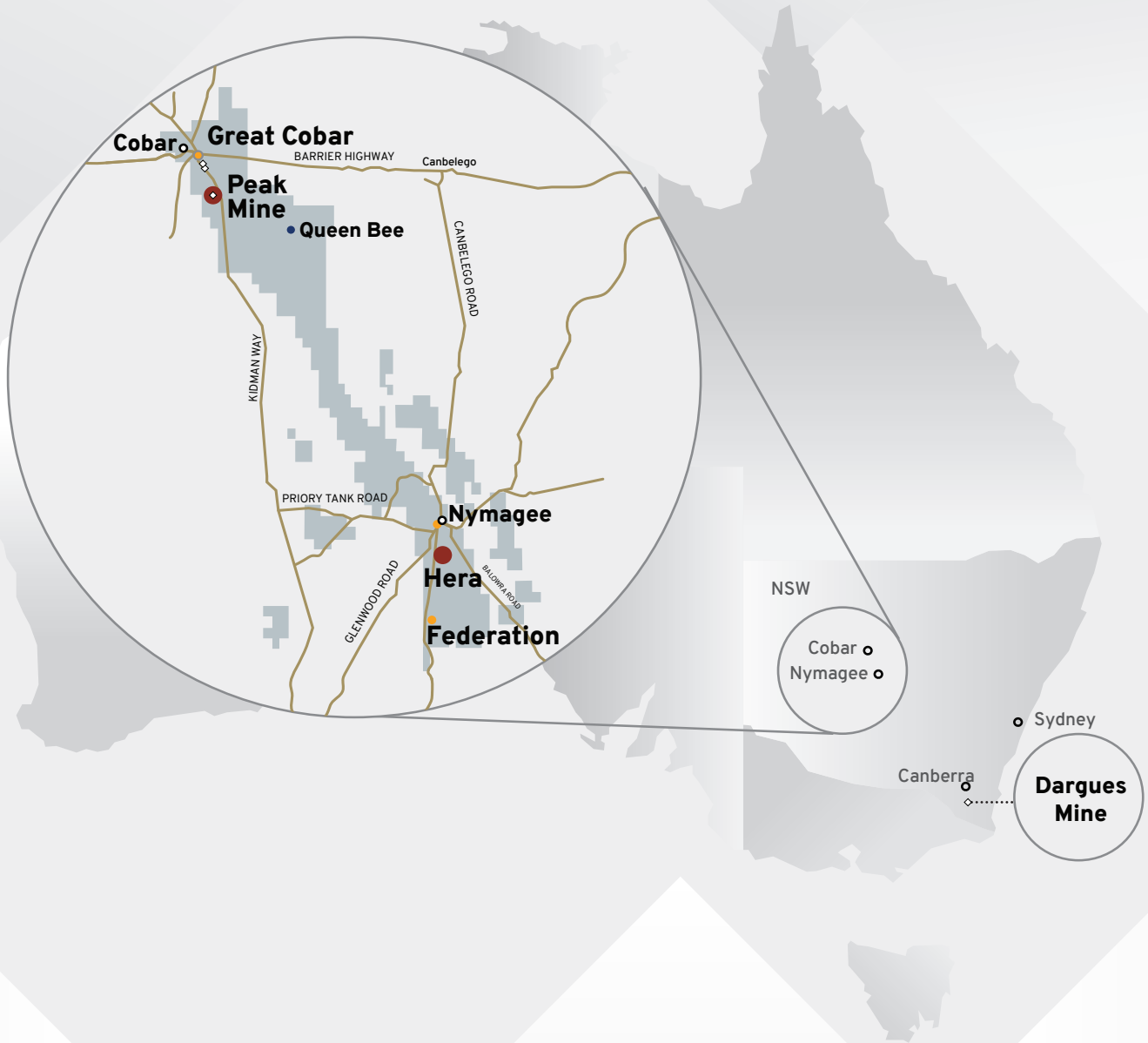
<sup>1</sup> Aurelia Metals Limited Annual Report 2024, page 14.



# WHAT WE DO CONT.

## LEGEND

- Processing Facility
- ◇ Operating Mine
- Development Project
- Tenement Holding
- Road
- Locality
- Exploration Prospect



# OUR PURPOSE

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To be a developer and operator of choice for base metals that power the future.

# OUR VALUES

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CARE



CURIOSITY



NIMBLE



ONE TEAM

# OUR STRATEGY

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OPERATE WITH DISCIPLINE

RIGHT PEOPLE, RIGHT MINDSET

FOCUSED GROWTH

SUSTAINABILITY DELIVERING VALUE



# OUR SUPPLY CHAIN

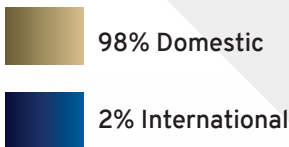
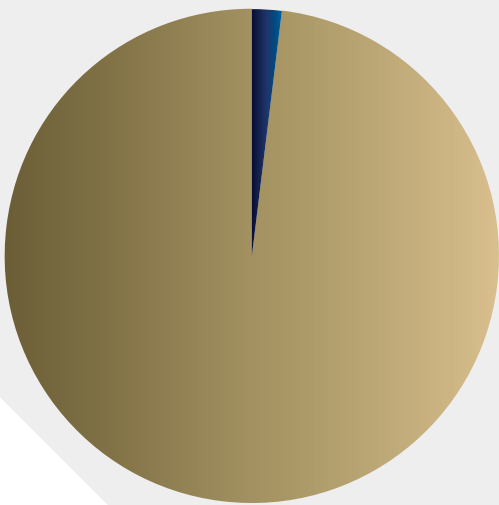
We procure goods and services from a diverse range of suppliers which we have broadly categorised into the following categories: Exploration, Support Services, Mining, Processing, Transportation, Construction and Corporate. Our categories have not changed from FY23.

In FY24, we procured over A\$214 million in goods and services from over 200 direct Australian suppliers (Tier 1), a decrease from FY23 spend with the same number of suppliers (FY23: ~A\$278 million from approximately 200 direct Australian suppliers (Tier 1)). The decrease in spend is largely due to the transition from contract mining to owner operator at our Peak Mine. We're committed to supporting

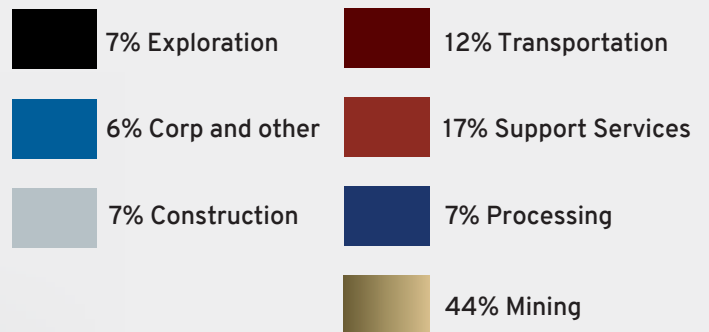
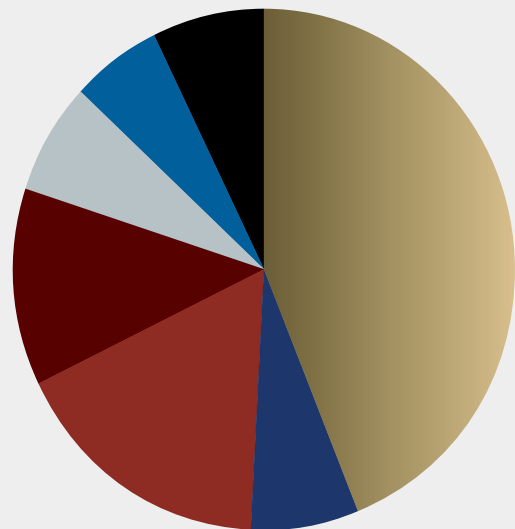
local businesses and the communities in which we are operate. This year, 37% of all goods and services required for our operations were procured from local suppliers.

We're proud to report that 98% of our direct procurement spend comes from Australian suppliers with the balance being from countries including: Denmark, Germany, Netherlands, Singapore, Spain, Switzerland and the United Kingdom.

SUPPLY CHAIN SPEND BY LOCATION



SUPPLY CHAIN SPEND CATEGORY



# OUR SUPPLY CHAIN CONT.

Typical examples of products and services procured in our supply chain are listed below:

## PROCESSING

- ◆ Chemical and reagent suppliers
- ◆ Laboratory services and testing
- ◆ Mill and grinding consumables
- ◆ Tailings Storage Facility management, upgrades and construction.

## EXPLORATION

- ◆ Drilling contractors
- ◆ Geological services and consultants

## MINING

- ◆ Mining contractors (including raiseboring)
- ◆ Equipment purchase and hire
- ◆ Equipment and maintenance services
- ◆ Drill and blast (including explosives)
- ◆ Fuels and oils

## CORPORATE AND OTHER

- ◆ Advisory and regulatory services
- ◆ IT services
- ◆ Insurance

## TRANSPORTATION

- ◆ Freight (road and rail)
- ◆ Haulage
- ◆ Port services and shipping

## CONSTRUCTION

- ◆ Installing, modifying, or maintaining building or civil infrastructure assets including preparatory works (for example, earthworks and road upgrades)

## SUPPORT SERVICES

- ◆ Utility providers (power, water, gas, communication etc.)
- ◆ Engineering and fabrication services
- ◆ Parts and consumable suppliers
- ◆ Cleaning and waste management
- ◆ Camp accommodation and services (including food services)
- ◆ Project management services



# RISKS OF MODERN SLAVERY



The Peak Mine concentrate haulage yard

During FY24 we continued to strengthen our control measures, including reviewing and updating our risk assessment to ascertain our key modern slavery and human rights threats. We acknowledge there are modern slavery risks within our supply chains, and we are committed to implementing measures to mitigate these risks. We will continue to work collaboratively with stakeholders and partners to address the modern slavery concerns that are faced by our business.

## INTRODUCTION

We play an important role in identifying, preventing and mitigating the risks of modern slavery practices in our business, including our supply chains and take this role and our responsibilities seriously. We are focused on identifying and addressing emerging challenges and opportunities, and consistently implementing effective modern slavery risk mitigation measures and controls.

Aurelia relies on the UN Guiding Principles on Business and Human Rights<sup>2</sup> (the **Principles**) to assess the risks of modern slavery practices in our operations and supply chains. These Principles assess modern slavery risks based on whether an organisation has caused, contributed to, or is directly linked to modern slavery as set out in the table below:

CAUSE	CONTRIBUTE	DIRECTLY LINKED
<p>A company may cause modern slavery if its operations directly result in modern slavery practices. For example, this may include forced or exploited labour at our site.</p>	<p>A company may contribute to modern slavery, if, through its operations or omissions, it facilitates or incentivises modern slavery practices. For example, this may include engaging a cleaning company whose rates are substantially below the minimum award rates.</p>	<p>A company may be directly linked to modern slavery practices through the activities of another entity that it has a business relationship with, such as a supplier. For example, this may include engaging a supplier that uses forced labour during its manufacturing process.</p>

<sup>2</sup> UN Guiding Principles on Business and Human Rights: The Corporate Responsibility to Respect Human Rights, Section B Operational Principles



# RISKS OF MODERN SLAVERY CONT.



Front end loaders in the Peak concentrate haulage yard

## OUR OPERATIONS

All of our operations are situated within Australia and all employees and contractors are employed or engaged to work on our sites in New South Wales, or in our head office in Brisbane, Queensland.

Overall, we deem the risks associated with our operations as low, primarily because our operations and workforce are 100% based within a Tier 1 jurisdiction. In 2024, Australia was included as one of only 33 countries to have been ranked as “Tier One” in the US Department of State 2024 Trafficking in Persons Report. Tier One means that the Government of Australia fully meets the minimum standards for the elimination of trafficking. According to prevalence of modern slavery, Australia has been ranked 26 out of 27 within Asia and the Pacific and 149 out of 160 globally<sup>3</sup>.

Aurelia has policies, systems and processes in place to comply with its legal and contractual obligations. Modern slavery risks relating to our operations are managed through the health and safety of our employees, reporting mechanisms (detailed on page 15), compliance with our Code of Conduct (**The Aurelia Way**), our policy framework and maintaining good employment conditions.

To our knowledge we have not caused or contributed to modern slavery at our operations, and we deem the risk of being directly linked to modern slavery practices at our operations as low.

## OUR PEOPLE

Our employees constituted approximately 56.5% of the total workforce. The staff supplied by our main mining contractors (Redpath and PYBAR) accounted for approximately 21% and other contractors engaged by Aurelia accounted for approximately 22.5%.

The majority of our workforce is employed directly by the Company or one of its subsidiaries on a permanent basis. Their employment (and all other types of employment including casual or fixed term) is governed by contracts containing wages and conditions that meet all relevant minimum legal requirements under Australian law. All roles are contained within our structured remuneration framework which is benchmarked against market data. Our Remuneration and Nomination Committee, which is made up of Board members, has oversight over the remuneration framework.

## OUR SUPPLY CHAIN

As highlighted on page 9, almost our entire spend comes from Tier 1 suppliers. We recognise their supply chains (including the fabrication or manufacturing of raw materials) may extend overseas to countries and jurisdictions which have increased susceptibility to the risks of modern slavery. We acknowledge there is a possibility we may be directly linked to modern slavery practices prevalent in overseas manufacturing.

<sup>3</sup>Walk Free Global Slavery Index / Country Study – Modern Slavery in Australia



# RISKS OF MODERN SLAVERY CONT.

## OUR SUPPLY CHAIN CONT.

Our Modern Slavery Working Group reviews and updates our modern slavery risk assessment each year to identify and assess high-risk modern slavery categories in our supply chain and operations.


The FY24 high-risk categories and their potential indicators of modern slavery are outlined in the table below. Our mitigation measures for these high-risk categories are detailed on pages 14-15.



CATEGORY	DESCRIPTION	RISK
Construction	We regularly engage construction contractors for major projects and civil works on our sites.	The construction industry has an increased risk of modern slavery due to long supply chains, the potential for low-skilled and low-paid manual labour and the supply of raw materials from overseas.
Facilities management (cleaning and catering)	Accommodation, cleaning and food supply is a fundamental service at our sites and corporate office.	Facilities management has a higher risk of modern slavery due to the potentially high number of seasonal or migrant workers, low skills criteria and low pay.
Transport and logistics	We transport our concentrates via road, rail and sea. The concentrates are sold to commodity traders for on-sale to Australian and Southeast Asian Markets. We engage shipbrokers to charter vessels for shipping concentrates in bulk.  Whilst we follow a vetting process prior to chartering a vessel to transport concentrates, Aurelia has limited visibility in relation to the vessel owners employment practices and working conditions.	The shipping industry creates challenges of poor employment practices (including wage underpayment) and sub-standard living and working conditions. This category is known to be difficult for regulators to provide complete oversight of a shipping company's practices.
Overseas manufacturing and fabrication	We procure uniforms and personal protective equipment (including hard hats, eye and face protection, footwear, gloves and ear protection) as well as computers and mobile phones <sup>4</sup> from Australian based suppliers, however, we recognise that there is a high possibility these items or the raw materials used to produce these items are manufactured or fabricated in overseas locations.	Overseas manufacturing and fabrication can include factories that use migrant or low-skilled labour and/or employ a contracted labour force which are susceptible to poor working conditions.  There may also be minimal governmental regulation and oversight, and a general lack of support for workers to raise grievances.

<sup>4</sup> Global Slavery Index 2023 Country Study for Australia identifies “electronics” as products at risk of modern slavery in Australia. Electronics have an import value of US\$8.9 billion and the main countries these products are sourced from include China and Malaysia.

# OUR APPROACH



Surface drilling at the Nymagee deposit

## CORPORATE GOVERNANCE

Our holistic approach to responsible mining is underpinned by our Purpose, Values and Strategy; *The Aurelia Way*; and our policies, procedures and standards. This approach is overseen the Board, the Sustainability and Risk Committee and the Executive Leadership Team:

- ◆ Aurelia's **Board of Directors** provides strategic direction and oversight to ensure the effective management and performance of Aurelia. The Board holds the ultimate responsibility for our Strategy and policies.
- ◆ Our **Sustainability and Risk Committee** provides oversight on the implementation of our risk, compliance and safety frameworks.
- ◆ Our **Executive Leadership Team** is responsible for the day-to-day management of Aurelia, and the implementation of the strategic objectives. The Executive Leadership Team includes senior representatives from our sites and the corporate office.

We also have a **Modern Slavery Working Group** which is a dedicated group of employees who are focused on identifying and assessing Aurelia's modern slavery risks within our business and implementing actions to manage these risks. The working group is comprised of representatives from the corporate office and our sites with a cross section of functional areas (legal, finance, technology, procurement, sustainability and human resources). In FY24 our Modern Slavery Working Group conducted a group risk assessment

review, which included generating a list of corrective actions and risk mitigation strategies. None of the risks were identified as extreme or high and the majority of the mitigation strategies were implemented throughout the year.

More broadly, we are focused on building relationships within our workforce and with our suppliers to promote open and honest practices.

## POLICIES

*The Aurelia Way* and our Anti-Bribery and Corruption Standard establish our standards of personal and corporate conduct, including in relation to modern slavery and human rights, for our employees, suppliers, contractors and business partners.

Suppliers and contractors are required to be accountable for their actions and commit to ensuring they conduct their business in alignment with our Values and *The Aurelia Way*. They may be audited or required to certify or produce information relevant to their compliance with *The Aurelia Way*.

*The Aurelia Way* training forms part of the mandatory induction for any employee, contractor, or visitor to our sites.

We do not tolerate behaviour or conduct that does not align with *The Aurelia Way*.



## PROCUREMENT AND SUPPLIER ENGAGEMENT

We manage supply chain risk through procurement processes from the commencement of a tender until the completion of all contractual obligations. A mandatory pre-screening requirement for tenderers involves the completion of our detailed modern slavery questionnaire which requires tenderers to disclose modern slavery risks, in addition to setting out how modern slavery risks are managed and mitigated generally in their business. Each questionnaire that is part of a tender is reviewed and investigated (if required). This mandated due diligence process helps to protect us against modern slavery risks at the outset.

For procurement that does not go through a tender process, completing a modern slavery questionnaire is part of the mandatory supplier onboarding process in our accounts payable system.

Formal and informal engagement, including onsite visits by our teams, surveys and structured meetings, are key features of our ongoing engagement strategy with suppliers. These engagements aim to build relationships and work with organisations to identify and address modern slavery risks across our shared supply chains.

## CONTRACTS

We aim to enter into all contractual arrangements on our standard terms and conditions which includes a bespoke modern slavery clause that focuses on compliance with laws and reporting obligations. If we need to negotiate supplier terms and conditions, we take steps to ensure modern slavery is adequately addressed in the supplier's terms and conditions, or through the supplier's response to our modern slavery questionnaire.

Our standard contracts and purchase order terms and conditions contain a set of clauses relating to various responsible sourcing risks including anti-bribery and corruption, conflicts of interest, sanctions, modern slavery, subcontracting and record-keeping. We review these clauses periodically to ensure they align with any regulatory changes and changes in law.

For our shipping contracts, shipbrokers are subject to a shipping vessel nomination procedure and vetting process to screen for potential modern slavery concerns.

## EDUCATION AND TRAINING

Education and training for employees is provided on human rights and modern slavery through *The Aurelia Way* training. In addition, in FY23, we implemented an additional standalone modern slavery training for all employees and contractors (**MS Training**). The MS Training is provided in the suite of training modules for new employees and is required to be completed every two years, so personnel are aware of their modern slavery obligations on an ongoing basis.

The MS Training includes how to identify actual or potential risks of modern slavery within our business and supply chains, and the process of escalation should any incidents of modern slavery arise. The modules will be reviewed and updated as required.

As at 30 June 2024, 89% of Aurelia personnel were trained and deemed competent in the MS Training.

## REPORTING

Our commitment to open and transparent reporting is set out in *The Aurelia Way* and our Whistleblower Standard. We have dedicated Whistleblower Protection Officers and an external independent Whistleblower service provider, Stopline, where reports can be made on a confidential basis. We are focused on fostering an environment where employees, contractors, suppliers and stakeholders feel safe and supported to report any inappropriate or potentially inappropriate behaviour.

We take these reports seriously and any reports made pursuant to our Whistleblower Standard are reviewed and, where appropriate, are investigated and reported to the Board.

We are pleased to confirm that during FY24 there were no modern slavery concerns raised via any reporting mechanisms.



Senior Lab Technician, Mark Muru



# OUR FY24 ACHIEVEMENTS



## PERFORMANCE AGAINST OUT FY24 INDICATORS

**0**

Modern slavery incidents were raised through Stopline or our Whistleblower Protection Officers.

**89%**

of the workforce completed the MS Training.

**55%**

of corrective actions from FY24 modern slavery risk assessment were addressed and/or implemented.

## ACHIEVEMENTS

Key modern slavery achievements completed in FY24 are outlined below:

- ♦ Reviewed and updated modern slavery risk assessment.
- ♦ Implemented a supplier onboarding and maintenance system to manage our modern slavery data collection. This system requires suppliers to complete a modern slavery questionnaire in order to be onboarded and paid as a vendor. Since the introduction of this system in October 2023, 100% of supplier modern slavery questionnaires have been completed and returned to Aurelia.
- ♦ Met with representatives of three major suppliers including one of our primary mining contractors to discuss and understand their approach to modern slavery and how they mitigate issues within their supply chains.
- ♦ Included modern slavery compliance clauses in our template charter party agreement.

# LOOKING AHEAD



Left to right: Training Administrator, Neve Carter and Housing and Travel Officer, Peta Hill at our Peak Mine

## WE ARE FOCUSED ON CONTINUALLY IMPROVING HOW WE IDENTIFY, PREVENT AND MITIGATE MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS.

In FY25 this will include a focus on the following:

### ENGAGEMENT

Continue to build relationships with the modern slavery representatives of our contractors and suppliers in high-risk categories (set out on page 13 of this Statement) as well as our major mining contractors.

### TRAINING

Review and update of our MS Training modules.

### RISK

Review and update our modern slavery risk assessment to continually identify and manage modern slavery risks within the business. Ensure all risks are assigned to appropriate risk owners, each of whom are responsible for implementing adequate and achievable corrective actions with oversight from the Modern Slavery Working Group.

### EFFECTIVENESS

Seek to improve results of FY24 Key Performance Indicators set out on page 16 of this Statement.



## CONSULTATION WITH OUR SUBSIDIARIES

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Aurelia and its subsidiaries (see page 3) operate as a consolidated group with common leadership policies.

Our Managing Director and Chief Executive Officer is a director of each of the subsidiary companies, and our Company Secretary is also the company secretary for each of our subsidiaries. This means modern slavery and human rights are approached in a unified manner across Aurelia and its subsidiaries.

We are committed to continually building upon and improving our approach to modern slavery to ensure we continue to identify, prevent and mitigate the risk of modern slavery in our operations and supply chains.

As a Nimble company, we work to identify and address emerging challenges and opportunities, this includes modern slavery risk mitigations measures and controls.



Bryan Quinn  
Managing Director and Chief Executive Officer  
26 November 2024



The 2024 intake of apprentices with Aurelia Managers at the Peak Mine





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