

RESPONSIBLE PRODUCTION POLICY

PURPOSE

As a leading Australian mining services and resource development company, Mineral Resources Limited (MinRes) is committed to operating ethically and with integrity.

While MinRes does not operate in any high-risk or conflict affected areas, we recognise that there may be a risk of significant adverse impacts associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas. MinRes has a responsibility to respect human rights and not contribute to conflict. This Policy outlines MinRes' commitment to the responsible production of minerals.

SCOPE

This Policy applies to all MinRes Stakeholders, defined for this purpose as employees (including contractors and consultants), Directors, officers and suppliers for all entities within the MinRes Group.

OUR COMMITMENT

Should MinRes ever source or operate in a conflict-affected and high-risk area, we commit to:

- ▶ Preventing adverse human rights impacts from occurring, and where this is not immediately possible, design strategies to mitigate human rights risks
- ▶ Refraining from any action which contributes to the financing of conflict
- ▶ Complying with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions
- ▶ Not tolerating, profiting, contributing or commissioning any serious abuses associated with the extraction, transport or trade of minerals. Serious abuses include:
 - any forms of torture, cruel, inhuman and degrading treatment
 - any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty, and for which said person has not offered themselves voluntarily
 - any forms of modern slavery, including slave labour, human trafficking and worst forms of child labour¹
 - other gross human rights violations and abuses such as sexual violence
 - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- ▶ Not tolerating any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals
- ▶ Immediately suspending or discontinuing engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses and/or directly or indirectly providing support to non-state armed groups
- ▶ Ensuring public or private security forces are engaged in accordance with the Voluntary Principles on Security and Human Rights, where we or any company in our supply chain have contracted this service
- ▶ Where practicable, immediately devising, adopting and implementing a risk management plan with upstream suppliers and other stakeholders where we identify that a reasonable risk exists that we are sourcing from, or linked to, any public or private security forces. We will continue to pursue risk mitigation efforts while continuing trade. If after six months from the adoption of the risk management plan our mitigation attempts have failed, we will suspend or discontinue engagement with upstream suppliers
- ▶ Not offering, promising, giving or demanding any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export²
- ▶ Supporting efforts, or taking steps, to contribute to the effective elimination of money laundering

¹ ILO Convention No. 182 on the Worst Forms of Child Labour (1999)

² OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997); and the United Nations Convention Against Corruption (2004).

- ▶ Ensuring that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments
- ▶ Engaging with suppliers as appropriate, where we identify a reasonable risk of bribery, fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to government. This engagement will improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

OUR GOALS

MinRes will engage in responsible production and sourcing to minimise the risk of significant adverse impacts associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas.

OUR RESPONSIBILITY

MinRes will continue to take a proactive approach to ensure that it operates ethically and with integrity. MinRes stakeholders have a responsibility to comply with the principles of this Policy and any associated policies, procedures or processes.

All MinRes stakeholders have a responsibility to report suspected breaches of this Policy to their supervisor, manager or through the Mineral Resources confidential independent whistleblowing service, MinRes Integrity Assist, which provides an avenue for serious concerns to be reported. Details of this service are available at www.minresintegrity.deloitte.com.au.

RELATED DOCUMENTS

Code of Conduct and Business Integrity

Supplier Code of Conduct

Whistleblower Policy

Whistleblower Procedure

Community Policy

Anti-Bribery and Corruption Policy

Human Rights Policy

REVIEW OF POLICY

This Policy will be periodically reviewed, revised and re-published where necessary to ensure that it remains relevant and appropriate to MinRes' activities.



Derek Oelofse
Group Financial Controller and Company Secretary
24 January 2023