



MINERAL RESOURCES LIMITED
**SUPPLIER CODE
OF CONDUCT**

MARCH 2023





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ABOUT OUR SUPPLIER CODE OF CONDUCT

Mineral Resources Limited (MinRes) is committed to conducting business with integrity and operating in an ethical, safe and sustainable manner. We recognise that our responsibility extends beyond our operations and seek to work with suppliers who share our commitment to environmentally and socially responsible practices.

The purpose of our Supplier Code of Conduct ("the Supplier Code") is to set out expectations of our suppliers with regard to business integrity, health and safety, environmental, community, labour and human rights issues. The Supplier Code is based on MinRes' values and represents our commitment to uphold the highest standards of ethics and integrity across our business practices.

If you have any questions regarding this Supplier Code of Conduct or about our expectations of our suppliers and business partners, please email suppliermanagement@mrl.com.au or contact your MinRes Procurement representative.

OUR EXPECTATIONS OF OUR SUPPLIERS

The Supplier Code is applicable to all suppliers, contractors, and their respective personnel regardless of their location or role.

We ask our suppliers to take all reasonable steps to ensure all employees and subcontractors are made aware of and comply with the Supplier Code. MinRes expects its suppliers to encourage continuous improvement throughout all business operations in relation to these issues.

The Supplier Code should be read in conjunction with our [Code of Conduct](#) and Business Integrity and the applicable MinRes policies and procedures set out in section 8. These documents are available on our company website.

Suppliers and related personnel are expected to report breaches of the Supplier Code. You can find more information on how to report breaches in Section 7.1: How to Raise Concerns.



WE ARE COMMITTED TO MAINTAINING A **HEALTHY AND SAFE WORKING ENVIRONMENT** FOR OUR EMPLOYEES, CONTRACTORS AND VISITORS.

1.0 HEALTH AND SAFETY

We work with suppliers that take health and safety as seriously as we do. We expect that suppliers will comply with all applicable health and safety laws and regulations including MinRes’ operations, safety, health and environment guidelines, rules and procedures.

1.1 ENSURING A SAFE WORKPLACE

Suppliers must commit to maintaining a healthy and safe workplace which aims to eliminate workplace injuries, illness and health impairment. We expect our suppliers to have appropriate systems and processes in place to record, prevent, monitor and manage risks and incidents.

Suppliers should empower their employees to raise any health and safety concerns with the right to refuse working in unsafe conditions.

Suppliers providing goods and services into Western Australia are required to comply with the most current guidelines and directions as set by the WA Government.

1.2 EMERGENCY PREPAREDNESS

Suppliers are to ensure that there is an emergency preparedness plan in place to safeguard employees, operations and security of supply in emergency situations, such as pandemic disease, major catastrophe, natural and unforeseen events.

1.3 TRAINING AND PROTECTION

Suppliers should provide their workforce with role specific personal protective equipment (PPE) and appropriate health and safety training in accordance with relevant legislation and International Standards Organisation (ISO) certification.





2.0 LABOUR AND HUMAN RIGHTS

MinRes is committed to the management of people ethically, and in compliance with all laws, regulations and standards in relation to human rights, employment conditions and equal opportunity. We work with suppliers who support the welfare of both their employees and the community.

2.1 HUMAN RIGHTS

In line with international business and human rights standards and the Australian Government’s *Modern Slavery Act 2018 (Cth)*, MinRes is committed to respecting and upholding human rights and opposes modern slavery in its operations and supply chain. We expect that suppliers, and their supply chains, will conduct business in a manner that upholds and respects human rights and complies with all applicable laws and regulations including the internationally recognised labour and human rights principles set out in the following:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Global Compact
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- ILO International Labour Standards.

2.2 FORCED OR COMPULSORY LABOUR

MinRes expects its suppliers to not use forced or compulsory labour or any form of modern slavery. This refers to situations where one person has taken away another person’s freedom so that they can be exploited; and may include human trafficking, slavery, servitude, forced labour, debt bondage, worst forms of child labour¹, deceptive recruiting for labour or services, and forced marriage.

In complying with these expectations suppliers must ensure the following:

- Provision of fair and equitable remuneration and employment conditions
- Respecting workers’ rights to work voluntarily with fair work conditions
- Respecting workers’ privacy in compliance with applicable laws relating to the collection and use of personal information.

Suppliers shall ensure they have adequate processes and procedures to identify, evaluate and remedy any adverse human rights impacts and make all reasonable efforts to ensure that the businesses within your supply chain are not benefitting from, engaged in, or complicit with, human rights exploitations.

¹As defined by Article 3 of the International Labour Organisation (ILO) Convention No. 182.



MINRES VALUES BUSINESSES THAT HAVE POLICIES AND PRACTICES IN PLACE TO **ENCOURAGE DIVERSITY, EQUAL EMPLOYMENT OPPORTUNITY** AND RESPECT THE RIGHTS OF ALL PEOPLE.

2.3 CHILD LABOUR AND YOUNG WORKERS

Suppliers must prohibit all forms of child labour and always respect the minimum age of employment in compliance with applicable laws. The minimum age for providing labour shall always be the higher of national legislation of the relevant country in which the work is performed or standards set out by the ILO.

Suppliers must ensure young workers, particularly those under the age of 18 years, are not engaged in work that will harm their health or safety, or interfere with their ability to attend and benefit from school, training programs or careers.

2.4 WAGES, BENEFITS, WORKING HOURS AND LEAVE

Suppliers must comply with local laws, regulations or ILO guidelines (whichever provides the greatest level of employee protection), with respect to working hours, wages, benefits, leave entitlements, superannuation and public holidays.

2.5 PROVISION OF CONTRACT

All employees must be provided with a written employment contract in their native language. Suppliers must ensure probationary periods for new employees are consistent with applicable legal requirements.

2.6 DISCRIMINATION, BULLYING AND HARASSMENT

MinRes values businesses that have policies and practices in place to encourage diversity and ensure equal employment opportunity for all people. We expect suppliers to maintain a fair, diverse and inclusive workforce that does not discriminate against any employee on the basis of gender identity, nationality, marital or family status, sexual orientation, age, disability or impairment, Aboriginal or Torres Strait Islander identity, race, ethnicity, cultural background, religious beliefs, political conviction, union membership, socio-economic background, perspective, or life experience.

2.7 HARSH OR INHUMANE TREATMENT

Suppliers must treat all their employees and personnel with dignity and respect and practice zero tolerance of harsh or inhumane treatment, including physical, verbal or sexual abuse, harassment, corporal punishment, mental or physical coercion or any other forms of intimidation, including the threat of abuse.

2.8 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Suppliers shall respect and allow employees to exercise their lawful rights of free association and collective bargaining.



3.0 COMMUNITY

MinRes is committed to developing and maintaining strong community and stakeholder relationships as part of our social license to operate. We expect our suppliers to respect and promote engagement with local communities throughout all business activities, to undertake initiatives to improve the lives of local communities and to have relevant policies and procedures in place to meet these requirements.

3.1 NATIVE TITLE AND HERITAGE

Suppliers are expected to be aware of, and respect, the traditional rights of Aboriginal and Torres Strait Islander peoples² and acknowledge their right to maintain their culture, identity, traditions and customs. All consultation with Aboriginal and Torres Strait Islander peoples and communities shall be conducted in a culturally appropriate manner, with a focus on the protection and promotion of Aboriginal and Torres Strait Islander heritage and culture.

3.2 COMMUNITY ENGAGEMENT

Suppliers must treat all community members with dignity and respect. Engagement should occur early, openly, honestly, and regularly with the communities impacted by suppliers' operations and consider their views across all decision-making activities.

3.3 LOCAL PROCUREMENT

MinRes is committed to promoting, supporting and employing local communities and Aboriginal and Torres Strait Islander peoples. Suppliers are expected to work towards increasing procurement spend from Aboriginal and Torres Strait Islander businesses. Additionally, all suppliers shall ensure that their workplaces reflect the diversity of local communities in the areas we operate, and that recruitment and procurement activities create opportunities in a diverse and inclusive manner.



²When operating outside of Australia, suppliers are expected to be aware of, and respect, the traditional rights of First Nations.

WE WILL TAKE CARE TO **PROTECT THE** **ENVIRONMENT** IN WHICH WE WORK AND REQUIRE OTHERS TO DO THE SAME

4.0 ENVIRONMENTAL

As a part of MinRes' sustainability journey, we seek to operate in a way that protects and improves environmental outcomes. At a minimum, we expect that suppliers to MinRes promote a culture that values the environment and complies with all applicable environmental laws and regulations. All breaches, or potential breaches, of environmental licenses and permits must be disclosed to MinRes and in accordance with applicable laws and regulations. When operating on MinRes sites, suppliers and their employees and contractors must adhere to the MinRes Corporate Environmental Management System requirements.



Suppliers are encouraged to take a precautionary approach towards environmental issues, and seek ways to minimise the adverse environmental impacts of their operations, products and services, through:

- Efficient use of raw materials, energy and water
- Minimising the generation of waste through re-use and recycling of materials and eliminating unnecessary packaging
- Reducing greenhouse gas emissions
- Managing and protecting biodiversity
- Reducing the use of hazardous and toxic substances, and ensuring their correct disposal.

MinRes is committed to understanding and managing our climate-related obligations, risks and opportunities and we expect our suppliers to take appropriate actions to evaluate and mitigate the risks and opportunities of climate change associated with their operations, with efforts towards reducing greenhouse gas emissions aligned with the objectives of the Paris Agreement.

In relevant industries, suppliers are encouraged to adopt climate related financial disclosure practices in terms of the recommendations of the Task Force on Climate-Related Financial Disclosures.

5.0 BUSINESS INTEGRITY

MinRes considers that integrity is the cornerstone of good corporate governance. Suppliers are expected to conduct business in a fair, ethical and honest manner across all aspects of their business, including material sourcing and stakeholder relationships and operations, free from corruption, exploitation or contraventions of any applicable law.

5.1 ACTING LAWFULLY

We expect that suppliers to MinRes will comply with all applicable laws and regulations including those relating to anti-bribery and corruption.

5.2 BRIBERY AND CORRUPTION

Suppliers must not offer, promise, pay, authorise, accept or request bribes of any form (including facilitation payments and secret commissions) and must not improperly influence the decisions of a public official in any country.

5.3 GIFTS, HOSPITALITY AND ENTERTAINMENT

Suppliers shall not offer any gifts, entertainment, inducements or benefits which may influence, or be seen to influence, MinRes employees, subcontractors or fellow suppliers to gain unfair advantage.

5.4 CONFLICTS OF INTEREST

Suppliers shall disclose and appropriately manage any actual or potential conflicts of interest. Where potential conflicts of interest arise, this must be declared to the relevant MinRes personnel in advance of work proceeding.

5.5 FAIR AND OPEN COMPETITION

MinRes promotes fair and open competition and believes in competing for business. All suppliers are expected to uphold standards of fair trading, advertising and competition. Suppliers must not engage in any collusive or anti-competitive behaviour when responding to requests for quotation or tender.

5.6 RESPONSIBLE SOURCING OF MATERIAL

MinRes expects its suppliers to not knowingly or intentionally cause, contribute or be directly linked to the infringement of human rights through the manufacture or procurement of conflict minerals (including tungsten, tin, tantalum and gold³). Suppliers must have appropriate policies and due diligence measures to assure that products, and their supplied components, are free of conflict minerals or do not originate from conflict regions.

5.7 TRADE CONTROLS

Suppliers must ensure that they and their employees and affiliated companies comply with relevant financial, economic and trade sanctions laws that apply to all jurisdictions in which they operate, or intend to operate in. Suppliers must always comply with any sanctions administered or enforced.

5.8 DATA PROTECTION, PRIVACY

Suppliers must take all reasonable measures to ensure that information provided by MinRes is kept confidential; and that no document or information is released to any other party without prior approval from MinRes. Suppliers must comply with all data privacy and security laws, regulatory requirements and contractual agreements with MinRes, where personal information is collected, stored, processed and shared.

5.9 PROTECTION OF IDENTITY AND NON-RETALIATION

Suppliers must ensure that their workforce is able to report workplace violations, misconduct or grievances confidentially and without fear of retaliation.

5.10 SOCIAL MEDIA

Suppliers, their employees and contractors are expected to refrain from any defamatory, discriminatory, disrespectful, and prohibited activity on all social media platforms and to ensure that they do not act or speak on behalf of MinRes unless duly authorised.

³As defined by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016).



6.0 MANAGEMENT PROCESSES

All suppliers are expected to have, or be in the process of developing or implementing, appropriate mechanisms, policies and procedures to identify health and safety, labour practice, environmental and ethics risks associated with their business activities.

Suppliers must create and maintain documents and records to ensure compliance with MinRes policies and procedures, legislative and regulatory requirements. This must be conducted in an appropriate manner to ensure confidentiality of personnel and information.

Suppliers must ensure accurate records of all business transactions and operations are created and maintained to enable disclosure of all information regarding health and safety, labour, environmental, integrity and financial performance in accordance with applicable legislation, regulations and industry practice. Suppliers must not falsify or misrepresent records, conditions or practices.

Suppliers must develop and implement programs to enhance communication with, and training of, all employees regarding relevant policies, procedures and mechanisms designed to meet all legislative, regulatory and client requirements.

7.0 REPORTING & COMPLIANCE

The MinRes Supplier Code of Conduct is integral to procurement agreements with suppliers. MinRes intends to work with suppliers to ensure that their performance is aligned with the Supplier Code.

We may periodically request a self-assessment of supplier performance or assess suppliers' compliance with the Supplier Code by requesting supporting documentation. Throughout this process, our objective is to jointly identify opportunities for mitigating risks and improving performance.

7.1 HOW TO RAISE CONCERNS

We strongly encourage any supplier who becomes aware of any breach of this Supplier Code to discuss this with their MinRes contact. As a supplier to MinRes, you have access to our confidential independent whistleblowing service, MinRes Integrity Assist, which provides an avenue for serious concerns to be reported.



This service is provided by Deloitte, and you can make a report anonymously, if desired, using any of the following methods:

- Email: minresintegrity@deloitte.com.au
- Phone: 1800 951 300
- Fax: +61 3 9691 8182
- Visit website:
www.minresintegrity.deloitte.com.au
- Mail to postal address:
MinRes Integrity Assist
Reply paid 12628
A'Beckett Street, Melbourne VIC 8006.

For more information, please refer to the MinRes Whistleblower Policy and Procedure.

7.2 CONSEQUENCES OF BREACHING THE SUPPLIER CODE

Failure to comply with the Supplier Code is viewed seriously and MinRes reserves the right to take immediate corrective action, request mitigation or corrective action plans, or terminate the relationship if a supplier fails to comply with this Code.

If a breach has occurred, the nature of any disciplinary or corrective action will be determined in consultation with appropriate experts. Corrective actions depend on the seriousness of the breach and other relevant circumstances.

Breaches which constitute criminal conduct may also result in criminal prosecution. If the breach includes a violation of the law, the matter may be referred to the appropriate law enforcement authorities.

Serious breaches of this Code include, but are not limited to, the following:

- Requesting others to breach the Supplier Code or our values
- Failing to raise promptly any known or suspected breaches
- Failing to cooperate in investigations of possible breaches
- Retaliating against another person for reporting a business conduct concern
- Failing to demonstrate leadership and diligence to ensure compliance with this Code and the law.



8.0 RELATED DOCUMENTS

Suppliers have been given access to and must consider MinRes' relevant policies outlined below which are available on our [website](#), and ensure they have and maintain adequate policies and procedures to meet the relevant requirements. We expect suppliers to ensure that their own suppliers and contractors adhere to principles equivalent or greater than ours.

[Anti-Bribery and Corruption Policy](#)

[Code of Conduct and Business Integrity](#)

[Community Policy](#)

[Diversity and Inclusion Policy](#)

[Environment Policy](#)

[Health and Safety Policy](#)

[Human Rights Policy](#)

[Sustainability Policy](#)

[Whistleblower Policy](#)

[Whistleblower Procedure](#)

9.0 REVIEW

This Supplier Code will be periodically reviewed, revised and re-published where necessary to ensure it remains relevant and appropriate.

Derek Oelofse

Group Financial Controller and Company Secretary

1 March 2023



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