

Modern Slavery Policy

Date	Changed	Approved
14 February 2025	Original adoption	Board

Modern Slavery Policy

Hillgrove Resources is committed to upholding respect for human rights and the right for people to be free from forced labour and other forms of modern slavery in our operations and supply chains. This policy applies to all employees, contractors, suppliers, and business partners engaged with Hillgrove Resources across all operational sites and corporate offices globally.

OUR COMMITMENT TO ERADICATION OF MODERN SLAVERY INCLUDES:

- ▶ Integrating and incorporating human rights due diligence steps into all other relevant existing policy documents, such as human resources or procurement policies or procedures, or employee handbooks or codes of conduct
- ▶ Assessing human rights impacts and risks within the broader organisational risk profile
- ▶ Undertaking human rights due diligence on suppliers and service providers to identify, prevent, mitigate, and account for how suppliers and service providers address their human rights impacts
- ▶ Conducting hotspot analysis to better understand the risk of causing, contributing to, or being directly linked to modern slavery
- ▶ Establishing processes to enable effective remediation for any adverse human rights impacts which the business causes or contributes to
- ▶ Encouraging transparency and accountability in all business dealings

RISK IDENTIFICATION AND MANAGEMENT ACTIVITIES

- ▶ Conducting regular risk assessments of our supply chain and operations
- ▶ Implementing ethical procurement and supplier engagement frameworks
- ▶ Requiring suppliers and service providers to comply with our Supplier Code of Conduct
- ▶ Monitoring high-risk regions, industries, and supply chain tiers for potential modern slavery risks

OUR DUE DILIGENCE EXPECTATIONS OF OUR SUPPLIERS AND SERVICE PROVIDERS

- ▶ Our suppliers are to uphold ethical standards by complying with all applicable laws related to labour rights and modern slavery and demonstrating transparency in their employment and subcontracting practices
- ▶ Allow independent audits and reporting mechanisms to verify compliance and take corrective action if modern slavery risks are identified

REPORTING AND GRIEVANCE MECHANISMS

- ▶ Employees, contractors, and stakeholders are encouraged to report concerns related to modern slavery through our confidential reporting channels. Reports will be investigated promptly

TRAINING AND AWARENESS

- ▶ We will provide ongoing training to employees, particularly those in procurement, human resources, and operational roles, to ensure they understand modern slavery risks and their responsibilities in preventing exploitation

The implementation of this policy will be overseen by the Hillgrove Board and the Executive Committee. An annual Modern Slavery Statement will be published, outlining our progress and actions taken.

R (Bob) Fulker

Managing Director and CEO – Hillgrove Resources