



# MODERN SLAVERY STATEMENT



WE MINE FOR  
PROGRESS

A member of:

ICMM  
International Council  
on Mining & Metals

MINING WITH  
PRINCIPLES

HKEX:1208





# CONTENTS

ABOUT THIS STATEMENT	1
CASE STUDY: COVID-19 IMPACT ON OUR BUSINESS	2
WHO WE ARE – ORGANISATIONAL STRUCTURE AND OPERATIONS	4
OUR SUPPLY CHAIN	8
OUR COMMITMENT TO HUMAN RIGHTS	10
ADDRESSING THE RISK OF MODERN SLAVERY IN OUR OPERATIONS	12
> RISK IDENTIFICATION AND ASSESSMENT	12
> SUPPLIER CODE OF CONDUCT	12
> SUPPLIER QUESTIONNAIRE	13
> MODERN SLAVERY FACT SHEET	13
> SUPPLIER DUE DILIGENCE	13
> CONTRACT TERMS AND CONDITIONS	13
> TRAINING	14
> GRIEVANCES AND REMEDY	14
> GOVERNANCE	14
> MEASURING EFFECTIVENESS	15
> COMMUNICATION, ENGAGEMENT AND DISCLOSURE	15

## ABOUT THIS STATEMENT

This modern slavery statement is for the financial year commencing 1 January 2020 and ending 31 December 2020. The statement has been prepared by MMG Limited (**MMG**) in accordance with the requirements of the Australian *Modern Slavery Act 2018* (Cth) and has been reviewed and approved by MMG's Board on 19 May 2021.

This is a joint statement that covers the following reporting entities (each an '**MMG Reporting Entity**')

- › MMG Limited;
- › Album Resources Pte Ltd;
- › Album Investment Pte Ltd;
- › MMG Australia Limited; and
- › MMG Dugald River Pty Ltd.

A list of principal subsidiaries within the MMG Group can be found in Note 16 of [MMG's 2020 Annual Report](#). Album Resources Pte Ltd and Album Investments Pte Ltd are holding companies for a number of entities within the MMG Group, including MMG Australia Limited and MMG Dugald River Pty Ltd.

This statement describes actions taken by the MMG Reporting Entities to assess and address modern slavery risks in our operations and supply chains in the reporting year. MMG is submitting this statement on behalf of the MMG Reporting Entities and our subsidiaries, and the entities owned or controlled by our company. In this statement the terms MMG, the 'Company', the 'Group', 'our business', 'organisation', 'we', 'us', 'our', and 'ourselves' refer to the MMG Reporting Entities and, except where the context otherwise requires, their subsidiaries.

The following table sets out the mandatory reporting requirements of the Act and where each has been addressed in this statement.

NO.	MANDATORY REQUIREMENT	THIS STATEMENT
1.	Identify the reporting entity and describe its structure, operations and supply chains.	About this statement (p1)  Who we are – organisational structure and operations (p4-8)  Our supply chain (p8-10)
2.	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Addressing the risk of modern slavery in our operations (p12-15)
3.	Describe the actions taken by the reporting entities that the entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Addressing the risk of modern slavery in our operations (p12-15)
4.	Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks.	Addressing the risk of modern slavery in our operations (p12-15)
5.	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Governance (p14)  Communication, engagement and disclosure (p15)



Geoffrey (Xiaoyu) Gao  
**CEO MMG LIMITED**

## CASE STUDY: COVID-19 IMPACT ON OUR BUSINESS



During 2020, MMG's business has been significantly affected by the spread of COVID-19. We implemented a range of health and safety measures to safeguard our people, operations and communities while ensuring we continued day-to-day operations where safe to do so.

### IMPACT ON OUR OPERATIONS

- › **Las Bambas (Peru):** As a result of a strict national lockdown in March 2020, only critical operations were maintained. In cooperation with the Peruvian Government, Las Bambas coordinated a revised roster of workers to ensure ongoing safe management of essential activities on the site.
- › **Kinsevere (DRC):** In late-March 2020, the DRC Government announced a mandatory 14-day national lockdown to prevent the spread of COVID-19 within the DRC. During that period, operations were supported by a reduced workforce of essential workers to ensure the safe management of critical activities.
- › **Rosebery (Australia):** Our operations continued normally with significant self-distancing measures in place, coupled with increased sanitation, cleaning and awareness raising.
- › **Dugald River (Australia):** Our operations continued normally, with strict controls around social distancing and hygiene.

### IMPACT ON OUR WORKFORCE

Regional lockdowns at our Kinsevere mine in the DRC and our Las Bambas mine in Peru impacted the movement of our people and their return to their families. Many of our employees had to remain on site for extended periods during national lockdowns. This had the potential to impact wellbeing. As a response, we introduced safety, health, hygiene and social distancing procedures to reduce the risk of viral transmission. We also provided mental health support and regular communication about how to keep our people safe. Some of our measures included:

- › limiting non-essential travel;
- › conducting pre-arrival health checks, coupled with health and safety awareness discussions;



## CASE STUDY: COVID-19 IMPACT ON OUR BUSINESS CONTINUED

- › enforcing social distancing measures at a minimum of 1.5 metres while working, eating and travelling;
- › closing all non-essential gathering places;
- › installing additional hygiene stations;
- › increasing the frequency and extent of cleaning and disinfecting working areas, including buses;
- › providing additional hygiene products and personal protective equipment (PPE); and
- › enforcing reasonable quarantine measures (onsite quarantine and home quarantine).

All our sites developed plans in the event of a positive case being identified and have established isolation protocols in close coordination with the MMG Crisis Management Team. This team was established to oversee the corporate and site-based responses to COVID-19, in line with the national requirements.

### IMPACT ON OUR COMMUNITIES

COVID-19 has also significantly impacted our host communities, especially in Peru and the DRC.

Our measures to control the impact of COVID-19 included managing transport risks related to our workforce at the site (fly-in, fly-out, bus-in and bus-out); providing hygiene products and PPE for local health authorities; providing health awareness and training to our communities; and providing regular health and safety information updates via community radio.

We have continued an ongoing dialogue with our communities and implemented a series of initiatives during the COVID-19 pandemic, including:

- › additional funding and support for local and regional health directorates, including sourcing critical PPE and hygiene products;
- › coordinating with the World Health Organisation (WHO), to sponsor training of host communities around our Kinsevere operations in the DRC;
- › providing food packages and necessities to over 6,000 families around our Las Bambas operations in Peru;
- › installing over 110 public wash points and physical markers for social distancing in Kipushi Territory in the DRC, where our Kinsevere operations are located; and

- › supporting the safe return of migrant workers in our operations in Kinsevere, DRC.

### IMPACT ON OUR SUPPLIERS

Our suppliers' activities have been impacted by the effects of the COVID-19 pandemic.

MMG has taken a number of steps to protect and support workers in its operations and supply chains, including:

- › maintaining supplier relationships and fostering open communications;
- › honouring contractual obligations with suppliers wherever possible;
- › continuing existing supplier risk-based due diligence and remediation processes;
- › collaborating with suppliers, workers and communities to identify best-practice approaches to protect and support vulnerable workers;
- › providing up-front payments to suppliers where appropriate;
- › enabling contractors to be based at our sites (in Peru);
- › building a temporary onsite camp to support contractor workforce (in the DRC); and
- › providing quarantine hotels in Peru.



IMAGE: Employee temperature screening at Rosebery mine.



## WHO WE ARE – ORGANISATIONAL STRUCTURE AND OPERATIONS

Founded in 2009, MMG Limited is a mid-tier, global producer of base metals listed on the Hong Kong Stock Exchange (HKEx:1208). We operate and develop copper, zinc and other base metal projects across Australia, the DRC and Peru. These commodities are critical to realising the global UN Sustainable Development Goals, through support of technology, infrastructure and agriculture

sectors that meet the needs of a growing population.

MMG is structured as a public liability company with approximately 10,000 employees and contractors. Working in partnership with our major shareholder – China Minmetals – our objective is to be valued as one of the world's top miners. A list of principal subsidiaries within the MMG Group be found in Note 16 of [MMG's 2020 Annual Report](#).

### AUSTRALIA

#### PRODUCTION

245,097	TONNES OF ZINC IN ZINC CONCENTRATE	47,119	TONNES OF LEAD IN LEAD CONCENTRATE	1,537	TONNES OF COPPER IN COPPER CONCENTRATE
---------	------------------------------------	--------	------------------------------------	-------	--

#### 2020 WORKFORCE

1,090	TOTAL WORKFORCE	11.8	% FEMALE	94.2	% NATIONAL
-------	-----------------	------	----------	------	------------

### DEMOCRATIC REPUBLIC OF THE CONGO (DRC)

#### PRODUCTION

72,007	TONNES OF COPPER CATHODE
--------	--------------------------

#### 2020 WORKFORCE

2,415	TOTAL WORKFORCE	10.4	% FEMALE	97	% NATIONAL
-------	-----------------	------	----------	----	------------

### PERU

#### PRODUCTION

311,020	TONNES OF COPPER IN COPPER CONCENTRATE	3,167	TONNES OF MOLYBDENUM IN CONCENTRATE
---------	--	-------	-------------------------------------

#### 2020 WORKFORCE

6,369	TOTAL WORKFORCE	8.9	% FEMALE	99	% NATIONAL
-------	-----------------	-----	----------	----	------------



## WHO WE ARE – ORGANISATIONAL STRUCTURE AND OPERATIONS CONTINUED

MMG, through its subsidiaries, operates four mines;

1. Dugald River: one of the world's largest zinc operations, located approximately 65 kilometres north-west of Cloncurry in Queensland, Australia.
2. Kinsevere: a copper mine located in the DRC, approximately 35 kilometres from Lubumbashi, Katanga Province.

3. Las Bambas: a large, long-life copper mine located in Cotabambas in the Apurimac region of southern Peru.
4. Rosebery: a polymetallic base metal mine located approximately 300 kilometres north-west of Hobart in Tasmania, Australia.

Our Head Offices are located in Melbourne, Australia and Beijing, People's Republic of China.

### CORPORATE OFFICE\*

### WORKFORCE

160

TOTAL WORKFORCE

50.6

% FEMALE



% female = the percentage of women in the MMG workforce. This does not include contractor numbers.

% national = the percentage of the workforce with the same nationality of the country where the operations are located.

\* MMG Corporate includes Melbourne and Beijing Head offices, Hong Kong office and Vientiane.



## WHO WE ARE – ORGANISATIONAL STRUCTURE AND OPERATIONS CONTINUED

Our business is committed to compliance with international standards and respect for human rights, coupled with operational efficiency and simplicity.

We actively identify and manage significant risks to human health and the environment during the transportation, storage, handling and processing of our products.

Our value chain extends from the initial exploration work to identifying prospective deposits through to managing the responsible closure of operations.

### OUR VALUES



#### WE THINK SAFETY FIRST

We stop and think, then act to prevent injury



#### WE RESPECT EACH OTHER

We are honest, considerate and act with integrity



#### WE WORK TOGETHER

We engage diverse views to achieve better outcomes



#### WE DO WHAT WE SAY

We take responsibility and follow through on our commitments



#### WE WANT TO BE BETTER

We always look for opportunities to improve

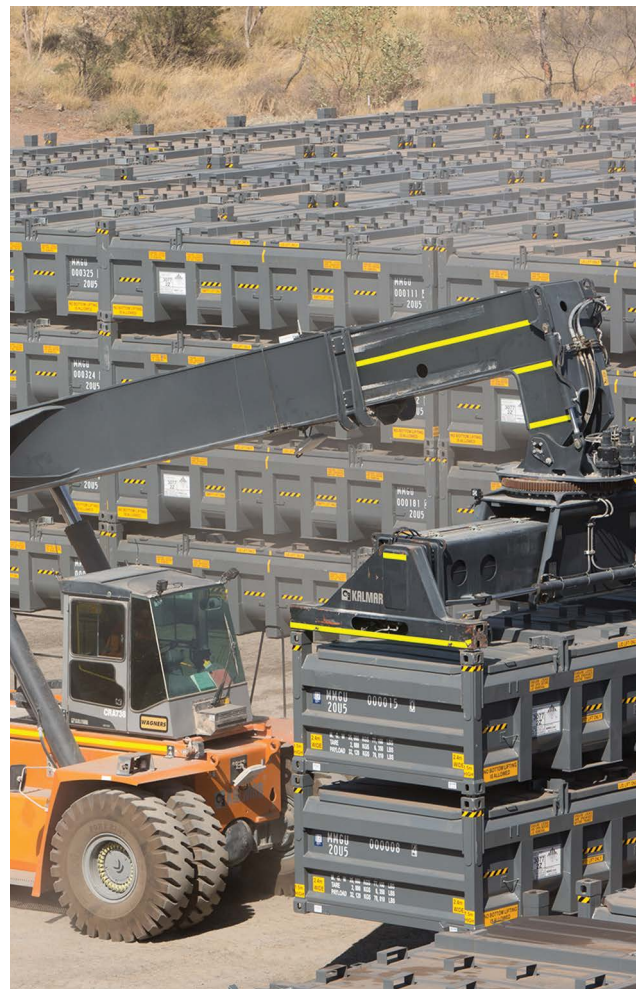







IMAGE: Loaded concentrate containers at Dugald River, Australia.

## WHO WE ARE – ORGANISATIONAL STRUCTURE AND OPERATIONS CONTINUED

<p><b>Discovery and geoscience</b></p>	<p>Project generation, near-mine exploration and extending mine life.</p>	
<p><b>Project development</b></p>	<p>Evaluating geoscience and discovery results, mine design, planning and development, environmental and social impact assessments to determine the feasibility of developing a mineral deposit into an operating mine.</p>	
<p><b>Operations</b></p>	<ul style="list-style-type: none"> <li>› Extraction of mineral deposits utilising different metallurgy techniques suitable for our mineral deposits.</li> <li>› Processing of extracted mineral deposits separating commercially valuable minerals from their ores to produce a saleable product.</li> </ul>	
<p><b>Marketing</b></p>	<p>Working closely with our customers to deliver value. The copper concentrate produced at Las Bambas is predominantly sold to customers in Asia, with China being the largest market. Las Bambas molybdenum concentrate is sold to customers in Chile and Asia. Copper cathode produced at Kinsevere is delivered to copper consumers in Europe, the Middle East and Asia. Zinc and lead concentrates produced at our Australian mines (Rosebery and Dugald River) are delivered to smelters in Australia and Asia.</p>	
<p><b>Road transport</b></p>	<p>Transport of raw materials from our mines in-country to export ports.</p>	
<p><b>Sea transport</b></p>	<p>Transport of our product via charter vessels to overseas customers.</p>	
<p><b>Economic transition and closure</b></p>	<p>We prepare for closure throughout the life cycle of a project. Closure involves maximising the potential value of infrastructure and land-based assets by considering alternative economic uses coupled with monitoring of environmental and social impacts and land restoration for future use.</p>	

We work in complex jurisdictions and across numerous cultures and geographies. Fundamental to our success is our commitment to sustainable development and stakeholder engagement to ensure we minimise the negative impacts of our operations, and maximise the benefits we can provide to our host communities and regions through our investments and operations.



## OUR SUPPLY CHAIN

Our suppliers are essential to our business and we engaged with approximately 4,300 suppliers, of which over 90% were in Peru, Australia, the DRC, South Africa and China. Our total spend in 2020 was over \$1,846M.

Our supply chain activities cover the life cycle of an asset from exploration to post closure and include the following:

- › *Operational and technical services:* construction and services associated with fixed plant and mobile assets including labour hire
- › *Transport services: logistics;* road and sea (trucks and charter vessels); workforce transportation (buses, charter flights and helicopters)
- › *Support services:* security, workforce accommodation, maintenance, cleaning, catering
- › *Corporate and administrative services:* property management; facilities management; travel management; corporate administration services (such as insurance services, accounting, audit)
- › *Procurement of goods/commodities:* personal protective equipment (PPE) uniforms including footwear for our workforce; fuel; explosives; chemicals; bulk commodities, such as lime; stationary; medical supplies, and tools
- › *Procurement of equipment:* electronics; minor electrical equipment; motor vehicles; mining equipment and infrastructure; mobile fleet, including parts

Our Head Office supply team provides governance functions and compliance roles to site-based supply teams and key corporate strategic initiatives. Our supply chain departments perform: sourcing and contracting, contract management, warehouse operations, inventory management, inbound logistics and governance functions and compliance.

Our relationship with each supplier starts from the identification and selection process all the way to contracting and contract/supplier management. We undertake a comprehensive risk-based due diligence assessment of potential suppliers across a range of financial and non-financial criteria including commercial,

quality and technical capabilities as well as health and safety management and performance, environmental management, social contribution and commitment to local employment. In 2020, we worked to expand our due diligence questionnaire to include a particular emphasis on risks of human rights abuses and modern slavery practices, policies and compliance. The implementation of this due diligence process will continue into 2021.

As a part of our supplier engagement and on-boarding process we also seek a formal agreement from our suppliers to comply with our Code of Conduct, Anti-corruption policies and other relevant MMG policies and procedures, and from 2020, MMG's Supplier Code of Conduct.



IMAGE: Ship at Matarani port, Peru.

## OUR SUPPLIERS IN 2020

### PERU

1,759

NUMBER OF PERU-BASED SUPPLIERS

\$1,208M

2020 SPEND

KEY PRODUCTS SOURCED

FUEL SUPPLY, HEAVY EQUIPMENT, ELECTRICITY, TYRES AND LOGISTICS

### AUSTRALIA

1,482

NUMBER OF AUSTRALIA-BASED SUPPLIERS

\$412M

2020 SPEND

KEY PRODUCTS SOURCED

MINING SERVICES, LOGISTICS, GAS SUPPLY AND ELECTRICITY

### DRC

417

NUMBER OF DRC-BASED SUPPLIERS

\$221M

2020 SPEND

KEY PRODUCTS SOURCED

MINING SERVICES, FUEL SUPPLY, LOGISTIC AND COPPER ORE SUPPLY

### SOUTH AFRICA

205

NUMBER OF SOUTH AFRICA-BASED SUPPLIERS

\$18M

2020 SPEND

KEY PRODUCTS SOURCED

DRILLING SERVICES, ELECTRICITY, REAGENT AND SPARE PARTS

### CHINA

95

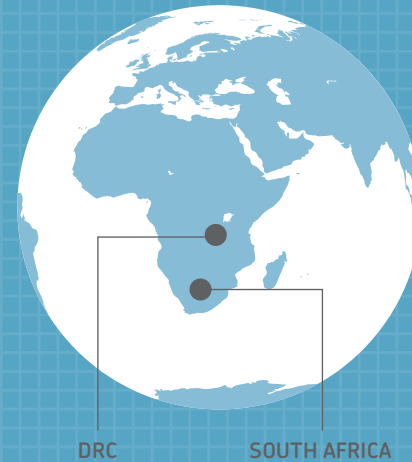
NUMBER OF CHINA-BASED SUPPLIERS

\$9M

2020 SPEND

KEY PRODUCTS SOURCED

LOGISTICS, PROFESSIONAL SERVICES, OFFICE RENT, REAGENT SUPPLY





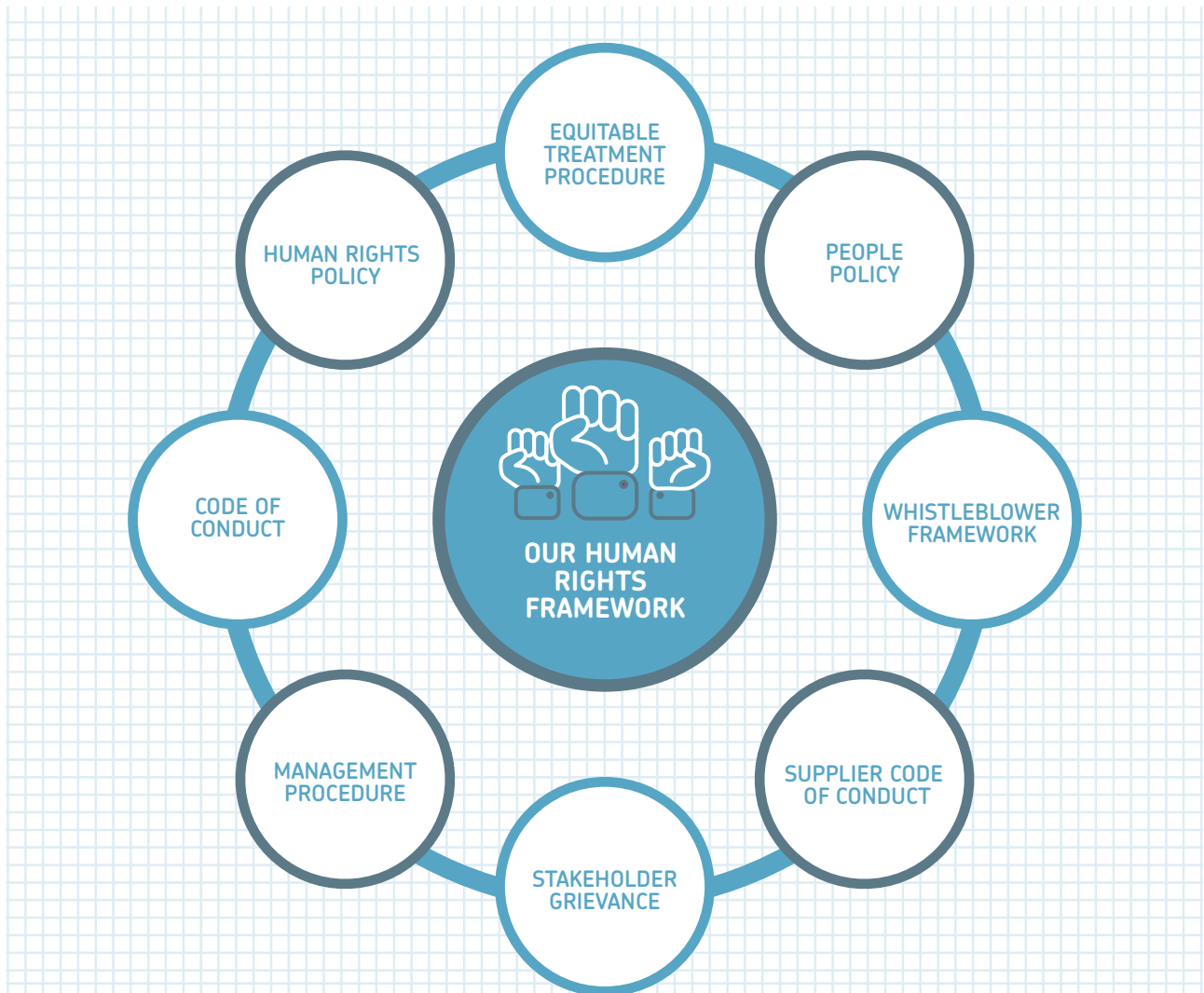
## OUR COMMITMENT TO HUMAN RIGHTS

As a mining company, we recognise our responsibility to support and respect the protection of international human rights within our sphere of influence by ensuring we are not complicit in human rights abuses, including modern slavery.

We have been an Engaged Member of the Voluntary Principles on Security and Human Rights initiative since 2020. We operate in accordance with the United Nations Guiding Principles on Business and Human Rights, and the United Nations Global Compact Principles.

We adhere to the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and we are a member of the International Council on Mining and Metals (ICMM) and adhere to ICMM Mining Principles.

Our commitments and approach to human rights is embedded across our standards that, together, constitute our Human Rights Framework. We integrate human rights considerations into our Code of Conduct, employment and procurement processes, risk-analysis activities, supply management, engagement, social investment and formal grievance mechanisms.



## OUR COMMITMENT TO HUMAN RIGHTS CONTINUED

Our commitment is outlined in our Human Rights Policy and our approach to managing human rights risk is embedded into our broader risk management

framework. All our documents are available in the official languages of jurisdictions in which we operate – English, French and Spanish.

<b>Human Rights Policy</b>	Outlines our commitment to respecting human rights, our belief in the dignity of every human being and our commitment to operate in accordance with international frameworks. Our policy can be accessed <a href="#">here</a> .
<b>Code of Conduct</b>	Sets out the standards of behaviour we expect from all our people, contractors and suppliers. In 2020, we began a review process of our Code of Conduct to emphasise our commitment to the protection of human rights, which will be completed in early 2021. Our current Code of Conduct can be accessed <a href="#">here</a> .
<b>Supplier Code of Conduct</b>	Outlines our minimum expectations of suppliers in relation to compliance with laws, human rights, modern slavery, health and safety, environmental compliance and ethical business practices. This Supplier Code of Conduct has been developed with the requirements the Modern Slavery Act 2018 (Cth) in mind. Our Supplier Code of Conduct can be accessed <a href="#">here</a> .
<b>Equitable Treatment Procedure</b>	Outlines our commitment to a working environment where everyone including our employees, contractors, subcontractors, apprentices, trainees and labour hire employees, is treated with dignity, courtesy and respect. This is an internal guidance document and is not publicly available.
<b>People Policy</b>	Provides an overview of the core MMG principles in relation to the management of company employees, and several of the principles directly support the preservation of basic human rights. We support the right to freedom of association across our business and ensure that all our employees feel empowered to exercise this right. This is an internal guidance document and is not publicly available.
<b>Whistleblower Framework</b>	Explains the process for reporting any improper conduct (including human rights breaches or other breaches of the Code of Conduct), the protections afforded to people who report improper conduct, how such reports will be dealt with and the type of action that may be taken as a result. The framework applies to all current and former officers, employees, associates, suppliers and others. Concerns can be raised internally within MMG or externally via the independent and confidential Whistleblower Hotline.  MMG also has dedicated contact officers who employees can contact to raise a concern. External parties, such as suppliers, are given access to MMG's confidential Whistleblower Hotline, via the Code of Conduct and Supplier Code of Conduct, to raise any concerns they may have in relation to improper conduct. Such complaints are addressed in accordance with the Whistleblower Framework. MMG's Whistleblower Framework can be found <a href="#">here</a> .
<b>Stakeholder Grievance Management Procedure</b>	Outlines our procedure for receiving, categorising, managing and remediating grievances from our local stakeholders, including human rights-related grievances. We reviewed and updated this procedure in 2020. This is an internal guidance document. This mechanism also provides a way of identifying negative impacts and allows MMG to continuously learn from, and place appropriate mitigations to protect against future impacts.
<b>Membership in industry bodies/initiatives</b>	Our human rights approach is also guided by our membership of, and accordance with: <ul style="list-style-type: none"> <li>&gt; the ICMM's Mining Principles. Each year we review our progress, and we work to improve our practices and procedures.</li> <li>&gt; the Voluntary Principles on Security and Human Rights, as well as the rules of engagement and the United Nations Basic Principles on the use of Force and Firearms by Law Enforcement Officials. To strengthen our alignment, in October 2018, we formally applied to become a participant of the Voluntary Principles on Security and Human Rights Initiative, and we became an Engaged Member of that initiative in 2020.</li> </ul>

We support the Extractive Industries Transparency Initiative (EITI) across all participating jurisdictions.



# ADDRESSING THE RISK OF MODERN SLAVERY IN OUR OPERATIONS

We take a proactive approach to tackle the risk of modern slavery across our international operations. Consistent with the ICMM Mining Principles, and guided by our commitment to human rights, we have a zero-tolerance approach to all forms of modern slavery.

## RISK IDENTIFICATION AND ASSESSMENT

We proactively assessed the risks of modern slavery in our operations throughout 2020, and we undertook an internal assessment of our operations and supply chains to identify potential risks.

First, MMG identified the general sectors and industries, types of products and services, categories of investments, countries and entities that are involved in MMG's operations and supply chains. The vast majority of supply chain engagement, occur in three countries – Australia, the DRC and Peru.

During 2020, MMG's supply chain function conducted a review of its tier-one suppliers, identifying the location, general sector and industry in which each operated.

Second, we reviewed which sectors, types of products and services, categories of investments, countries and entities that may involve a high level of modern slavery risks. Applying this methodology, MMG identified risks that might contribute to modern slavery practices arising from the following factors:

1. Parts of MMG's operations are in countries (particularly the DRC) that are reported to be vulnerable to modern slavery by international organisations.
2. MMG engages with the following high-risk sectors, products or services:
  - a. Suppliers of apparel and clothing accessories, including by sourcing PPE equipment and hygiene products during the COVID-19 pandemic
  - b. Transportation and logistics, including maritime freight and on-land transportation
  - c. Sourcing of cleaning services
  - d. Sourcing of security services
  - e. Sourcing of maintenance services and camp accommodation
  - f. Construction activities

Consistent with UN Guiding Principle 24, MMG's focus in this first reporting period has been to identify those high-risk areas of its supply chain listed above. As part of its commitment to continuous improvement, MMG plans to carry out due diligence on those high-risk areas and to expand its review of suppliers in the next reporting period.

We also recognise that COVID-19 has caused sudden socioeconomic changes across our global supply chain. We have reviewed the assessment findings across the relevant functions. We presented results of the assessment at our virtual Executive Committee meetings, integrated our findings and took the following actions.

## SUPPLIER CODE OF CONDUCT

Our suppliers are critical to our operations and we recognise that by working with them, we can minimise the risks of modern slavery. To further deepen our commitment, we released a Supplier Code of Conduct in 2020, which is available [here](#).

Our Supplier Code of Conduct sets our expectations of all suppliers of goods or services to MMG, their subsidiaries and subcontractors. It outlines the minimum standards required from our suppliers in regard to human rights; compliance with all applicable laws and regulations; forced labour and inhumane treatment of workers; child labour; wages, benefits and working hours; freedom of association; anti-discrimination, harassment, diversity and inclusion; health and safety; environmental compliance; ethical business practices; and employee development and training.

We also ask our suppliers to monitor their compliance and take all reasonable steps to address, remedy and prevent non-compliance. Like our Code of Conduct, the Supplier Code of Conduct provides for reporting of concerns that suppliers may have to MMG, either directly or via our confidential Whistleblower Hotline, to be addressed in accordance with our Whistleblower Framework.

Our contracts with suppliers require compliance with MMG policies and procedures, including the Supplier Code of Conduct. Therefore, while the Supplier Code of Conduct makes it clear that MMG is willing to work with suppliers, as appropriate, to address breaches, MMG does reserve the right to take appropriate action pursuant to its agreements with suppliers in the event of a breach of the Supplier Code of Conduct.

## ADDRESSING THE RISK OF MODERN SLAVERY IN OUR OPERATIONS CONTINUED



IMAGE: Kinsevere processing plant, DRC.

### SUPPLIER QUESTIONNAIRE

MMG developed a Modern Slavery Supplier Questionnaire to be provided to high-risk suppliers identified as part of MMG's ongoing risk assessments. The Supplier Questionnaire was designed, not only to enable MMG to make a detailed assessment of each supplier's commitment to the prevention of unethical human rights practices within its operations and supply chains, but also to require suppliers to engage with the issue and to make its own assessment of such risks. The questionnaire specifically asks about the impacts of COVID-19, to enable MMG to assess the ongoing impacts of COVID-19 on high-risk suppliers.

### MODERN SLAVERY FACT SHEET

Given many of our suppliers are located outside Australia and are unfamiliar with modern slavery legislative requirements, we developed a short fact sheet for them in 2020 to facilitate more effective engagement on the issue of modern slavery. We made clear the concept of modern slavery and MMG's expectations of suppliers in avoiding modern slavery practices in their operations and supply chains.

### SUPPLIER DUE DILIGENCE

In 2020, we added questions to our supplier due diligence process in order to include the assessment of modern slavery compliance requirements prior to onboarding or contract award. The aim of the due diligence process is to check any human rights and other ethical violations, as well as compliance with relevant international laws and conventions as stated in the MMG Supplier Code of Conduct.

### CONTRACT TERMS AND CONDITIONS

Our standard contracts impose minimum terms and conditions related to ethical practices, safety and the environment.

In 2020, we developed clauses for inclusion in our standard contracts that are designed to promote transparency and commitment for our suppliers to identify and address modern slavery in their operations and supply chains.

These clauses specifically require compliance with modern slavery laws in the applicable jurisdictions and prohibit modern slavery practices (as defined under Australian legislation) more generally. The clauses, along with the Supplier Code of Conduct, provide MMG with the ability to undertake direct due diligence in respect of individual suppliers' compliance with applicable modern slavery laws.

# ADDRESSING THE RISK OF MODERN SLAVERY IN OUR OPERATIONS CONTINUED

## TRAINING

In 2020, we developed a detailed modern slavery training module for our supply teams. The training has been tailored to provide teams with knowledge and skills related to identifying, assessing, addressing and preventing modern slavery risks in our supply chain.

Due to the impacts of COVID-19, the rollout of detailed face-to-face training was delayed and will be implemented progressively in the next reporting period.

## GRIEVANCES AND REMEDY

We have several mechanisms for our communities, employees, contractors and suppliers to raise grievances, including actual or suspected human rights grievances, breaches of our Code of Conduct or other company policies, without fear of intimidation.

In 2020, we also reviewed and updated our Stakeholder Grievance Management Procedure to ensure external grievances raised by our host communities and other local stakeholders, including human rights and modern slavery, are managed fairly and transparently in a timely manner. We also provided training to our employees on Stakeholder Grievance Management Procedure requirements.

## GOVERNANCE

MMG's Board of Directors (the Board) is accountable for the Company's sustainability performance. This includes health and safety, security, the environment, social performance, human rights and modern slavery, as well as other environmental, social and governance-related issues including the MMG Sustainable Development Framework.

The MMG Board regularly reviews and discusses sustainability-related issues at their meetings, including a quarterly Executive Safety, Health, Environment and Community report, and decisions are delegated to the Executive for their execution. In 2020, we focused on providing in-depth orientation to our Board regarding modern slavery law and obligations and we have engaged subject matter experts to assist in that briefing process.

The *Executive General Manager for Corporate Relations* is accountable for human rights and modern slavery strategies in MMG. This role chairs a Code of Conduct and People Committee, which meets at least quarterly and has been in place since 2015. In 2020, the committee's scope broadened to provide leadership, guidance and oversight in relation to human rights and modern slavery approaches. It also monitors implementation of business obligations under ICMM and VPI membership and the Australian *Modern Slavery Act 2018* (Cth).



IMAGE: Ferrobamba pit and Las Bambas operations, Peru.



## ADDRESSING THE RISK OF MODERN SLAVERY IN OUR OPERATIONS CONTINUED

Recognising that addressing modern slavery requires a business-wide approach, we formed a working group across the relevant functions that collectively works on addressing risks of modern slavery in our operations.

### MEASURING EFFECTIVENESS

Measuring effectiveness of our strategies and interventions is an important way we measure our progress.

On a yearly basis we set company-wide key performance indicators that enable us to measure effectiveness, and we communicate these through our sustainability report. In 2020, we developed an internal modern slavery action plan, which outlines priorities for 2021. We will be monitoring our progress through Code of Conduct and People Committee meetings and take corrective measures as required.

MMG also undertakes an annual risk and assurance review to determine that its policies and procedures are being complied with. This includes a review of MMG's engagement with outside parties, including suppliers, and the proper conduct of supplier due diligence. MMG implemented a requirement in 2020, for supply chain contracts to include clauses that enable MMG to undertake individual due diligence in respect of its suppliers' compliance with applicable modern slavery laws.

### COMMUNICATION, ENGAGEMENT AND DISCLOSURE

The MMG Group operates as an integrated group of companies with overarching policies, systems and processes that are designed to be applied to all companies within the MMG Group. MMG's federated structure is designed so that our Head Office performs governance and compliance functions, as well as the implementation of corporate initiatives, for regional and site-based teams across the MMG Group. Accordingly, our consultation process included engagement by our Head Office teams on behalf of each of the MMG Reporting Entities and subsidiaries in the MMG Group, to our regional and site-based teams.

This process has been led primarily by our MMG Corporate Relations and Supply teams, with the assistance of a number of other Head Office functions.

We also engaged with internal and external stakeholders in the assessment of risks of modern slavery in our operations, as well as in the preparation of this statement.

We have engaged with our operating entities in the process of preparation of the Modern Slavery Statement. While COVID-19 has impacted our ability to undertake site visits and conduct in-person engagement with our teams and suppliers, we have leveraged digital technologies to improve awareness about modern slavery and communicate with our teams and suppliers.

Prior to being put to the Board for review and approval, the Modern Slavery Statement was reviewed by each member of MMG's Code of Conduct and People Committee comprising

1. Executive General Manager Corporate Relations as the representative member of the Executive Committee;
2. the General Counsel;
3. the Head of People;
4. the General Manager Stakeholder Relations;
5. a Legal Counsel;
6. the Group Manager Organisational Development and Talent; and
7. the Lead Sustainability and Social Performance

From 2021, we will start including modern slavery reporting in our annual sustainability reports, which are published on MMG's website. We have disclosed our Modern Slavery Statement on our [website](#), and we have also created a dedicated supplier page to provide additional information to our suppliers – [MMG Supply Chain](#).

We disclose relevant standards, policies and reports on our corporate [website \(MMG\)](#) and, we also showcase case studies and our work in corporate social responsibility, sustainability and human rights on our [We Mine for Progress](#) website.

This statement has been endorsed by MMG's Executive Leadership team and approved by the Board of MMG Limited on behalf of the MMG Reporting Entities on 19 May 2021.



WE MINE FOR  
PROGRESS