

MODERN SLAVERY POLICY

This policy has been developed along with our Modern Slavery Statement and is guided by our ESG Policy.

Introduction

Every company is at risk of being involved in the crime of Modern Slavery through its own operations and its supply chain.

At Vertex Minerals Limited ACN 650 116 153 we have a zero-tolerance approach to modern slavery and are fully committed to preventing modern slavery in our operation and supply chain.

By developing our Modern Slavery Policy and our Modern Slavery Statement it addresses the management of our risk to it in our operations and supply chain and demonstrates a commitment to due diligence around reviewing our response to these risks.

Coverage

This policy applies to all Vertex Minerals Limited employees and contractors and includes any suppliers.

Purpose

This policy affirms our commitment to eliminating all forms of modern slavery and it outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. It is consistent with our ethical framework and contributes to a culture of high ethical standards, including compliance with applicable laws, due diligence, moral and other obligations. This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery and the Australian Modern Slavery Act 2018¹.

Definitions

Modern slavery for the purposes of this policy is defined by the Australian Modern Slavery Act 2018 to include eight types of serious exploitation and which can be understood as:

1. **trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
2. **slavery**, which is where the offender exercises powers of ownership over the victim;

¹ Modern Slavery Act (Cth) 2018. Available from: <https://www.legislation.gov.au/Details/C2018A00153>

3. **servitude** which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
4. **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
5. **forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
6. **debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
7. **the worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
8. **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

It can also extend to:

- entering into a commercial transaction involving a slave;
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it);

Indicators of modern slavery include:

- Individuals not being paid for the work they undertake;
- Individuals being held in debt-bondage (being told they "still" owe money after having paid off a previous debt);
- An individual's passport being held by their "employer" in order to keep the individual at work;
- Multiple benefit claimants having their benefits being paid into the same account;
- An individual not having freedom of movement (i.e. Passport being taken);
- Clear exploitation of an individual by another for financial or sexual gain.

Suppliers is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

Supply chains is defined as the products and services (including labour) that contribute to our own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

Commitment

We are committed to ensuring that there is no modern slavery as described in the definition of Modern Slavery in any part of our organisation or in our supply chain. We welcome transparency and our Modern Slavery Policy, along with our Modern Slavery Statement outlines our commitment to this issue for the general public, our stakeholders, suppliers and employees.

Approach

We will work proactively to reduce modern slavery risks within our supply chains and operations, and expect all organisations we engage with to do the same.

Recruitment

At the point of recruitment, appropriate checks in accordance with relevant laws are carried out on prospective employees and our HR team works closely with the relevant teams in the local territories to make sure that pay and conditions are appropriately managed.

Operations

This policy outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. The policy provides guidance on working with suppliers to reduce risks and outlines suggested protocols when/if we or a supplier becomes aware that someone is at risk of or is affected by modern slavery practices. (Refer to; 'Responding to concerns')

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

Risk assessment

We conduct an annual risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Suppliers

Suppliers must use best practice to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify us as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

Supplier due diligence

We conduct due diligence on all new suppliers during on-boarding and on existing suppliers. This includes:

- Assessing risks in the provision of particular products and services
- Engaging with and reviewing our suppliers, their practices and sources of products
- Sanctioning suppliers that fail to improve their performance in line with our requirements

Supply Chain

In accordance with our commitment to acting ethically and with integrity in all our business relationships, we intend to implement effective systems and controls to ensure Modern Slavery is not taking place in our supply chains. This will involve ensuring the effective communication and reinforcement of relevant policies, which give a clear view of the values and principles that underpin all our work and that we expect all persons involved in our business and supply chain to adhere to.

Training and development

We will provide our employees with communications and training and development opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

People with high purchasing responsibilities are provided additional training. People who initiate and/or periodically review relationships with third parties are provided with training to apply the relevant due diligence processes.

Reporting unethical or unlawful conduct

A key part of supporting ethical standards is enabling Vertex Mineral Limited's employees and contractors, as well as other people (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that our Company or our people are not acting ethically or in accordance with laws and obligations. Concerns about compliance or ethical issues or illegal or unethical activities are to be reported in accordance with our Whistleblower Policy.

Responding to concerns of modern slavery practices

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk of, or affected by modern slavery practices.

There are a range of supports available for when a person becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within our supply chains and operations or in the broader community.

Vertex Minerals Limited can be contacted for further information, advice and options available when a person is at risk of affected by modern slavery practices via <https://vertexminerals.com/contact/>.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

In an emergency and if someone is in immediate danger, call Triple Zero (000)

Related VTX policies:

- PE-01-C4 Modern Slavery Statement, October 2022_RW_V1
- Corporate Governance Plan, Schedule 02, Corporate Code of Conduct, 2021
- Corporate Governance Plan, Schedule 08, Continuous Disclosure Policy, 2021
- Corporate Governance Plan, Schedule 12, Whistle Blower Policy, 2021
- Corporate Governance Plan, Schedule 13, Anti-Bribery and Anti-Corruption Policy, 2021
- Corporate Governance Plan, Schedule 14, Shareholder Communications Strategy, 2021
- Corporate Governance Plan, Schedule 15, Environmental, Social and Governance Policy, 2021
- Corporate Governance Plan, Schedule 16, Privacy Policy, 2021



PE-01-C4 PEOPLE MODERN SLAVERY POLICY

Source:

Vertex Minerals Limited

Corporate Governance Plan

<https://vertexminerals.com/wp-content/uploads/2021/10/Corporate-Governance-Plan-VTX2806539.2.pdf>

Social Suite ESG

<https://esg.socialsuitehq.com/resources/vertex-minerals>