

MODERN SLAVERY POLICY

1. PURPOSE

Pilbara Minerals Limited and its subsidiaries (**the Group**) recognises its role in preventing and addressing modern slavery and is committed to maintaining ethical sourcing practices. By understanding its supply chain and business relationships the Group actively works to mitigate these practices within its operations. It also expects its contractors and suppliers uphold the same values and provide transparency in respect of their supply chains.

The purpose of this Modern Slavery Policy (**Policy**) is to.

- a) reduce the risk of modern slavery practices occurring within the Group, and its supply chain;
- b) communicate the Group's approach to modern slavery; and
- c) ensure compliance with the Commonwealth Modern Slavery Act 2018.

2. WHO DOES THIS POLICY APPLY TO?

All directors, officers and employees of the Group must comply with this Policy.

Additionally, the Group's agents, suppliers, contractors, business partners and any other party acting for or representing any of the Group (**Third Parties**) are to be made aware of this Policy and the Group's position in relation to the principles contained herein.

3. ROLES AND RESPONSIBILITIES

Board

The Board is responsible for approving and signing the annual Modern Slavery statement on recommendation from the Sustainability Committee (**SC**).

Managing Director & CEO

Responsible for approving this Policy and ensuring it is communicated throughout the Group.

Management

Responsible for ensuring that obligations within the Policy are understood by and implemented throughout their respective functional areas.

Contract owners are to actively monitor contractors and suppliers on a regular basis to ensure compliance with the Group's standing with respects to modern slavery.

Risk and Compliance

Provide training to members of the Group to generate understanding of modern slavery and the associated obligations as directors, officers, and employees.

Consult with contract owners to monitor contractors and suppliers and their compliance with modern slavery.

The Risk and Compliance function, in consultation with Management, will be responsible for the drafting and submission of the statement for Board approval following recommendation from the Sustainability Committee (**SC**).

4. WHAT DO WE MEAN BY MODERN SLAVERY?

Modern Slavery is a criminal offence and a violation of a person's fundamental human rights. It can be described as the exploitation of another person for personal or commercial gain. Modern Slavery can take various forms including human trafficking, forced or bonded labour, slavery of children or forced marriage.

(information noted in Section 4.0 has been sourced from www.antislavery.org)

5. PROCUREMENT OF GOODS & SERVICES

The Group's procurement framework (**Framework**) is the guiding mechanism for the engagement of contractors and suppliers for goods and services. The Framework outlines the due diligence applied during the selection process, in particular what constitutes modern slavery.

All contractors and suppliers who are to be engaged by the Group must be assessed for compliance with this Policy and those which are deemed to not comply will be discounted from selection processes.

6. MANAGING CONTRACTORS AND SUPPLIERS

Contractors and suppliers will be reviewed to ensure compliance under this Policy and their continued effort in preventing modern slavery throughout their businesses.

Reviews should be in the form of disclosure statements submitted by the contractor or supplier and updated accordingly.

Where a contractor or supplier does not take appropriate action, the Group will reserve its right to review the contractual agreement.

7. MODERN SLAVERY ANNUAL STATEMENT

The Group will prepare and submit a Modern Slavery Statement annually (whether it meets the threshold for reporting or not) in accordance with the Commonwealth Modern Slavery Act 2018.

8. SPEAKING UP ABOUT MODERN SLAVERY

Transparent modern slavery reporting is to be promoted within the Group at all times.

Directors, officers, employees, suppliers, and contractors have an obligation under this Policy to report any suspected or actual cases of modern slavery. Reporting should be done through the Executive Leadership team or via the Group's Whistleblower process.

9 BREACH OF POLICY

Any person who knowingly breaches this Policy may be subject to disciplinary action.

Contractors and suppliers who are found to have engaged in modern slavery and have not taken appropriate actions to rectify, may have the contractual relationship with the Group suspended or terminated.

POLICY REVIEW

This Policy has been approved by the Board and will be reviewed every two years and where applicable, updated accordingly.

Established	30 April 2021
Last Reviewed	28 March 2023
Frequency	Every 2 years