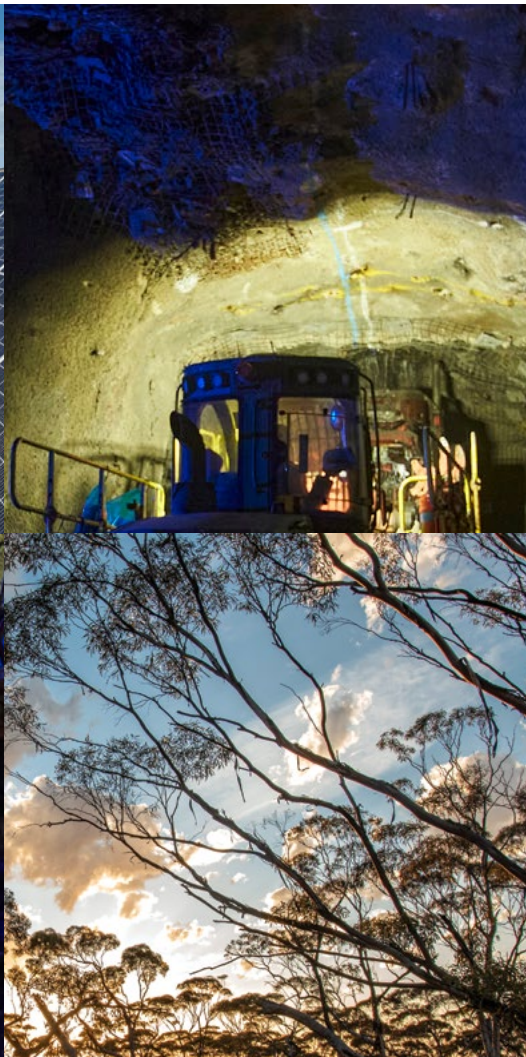




# Modern Slavery Statement 2022





# MAKING A DIFFERENCE

IGO Limited is an ASX 100 listed company focused on creating a better planet for future generations by discovering, developing and delivering products critical to clean energy.

## Who We Are

We are a purpose-led organisation with strong, embedded values and a culture of caring for our people and our stakeholders, and believe we are Making a Difference by safely, sustainably and ethically delivering the products our customers need to advance the global transition to decarbonisation.

Through our upstream mining and downstream processing assets, IGO is enabling future-facing technologies, including the electrification of transport, energy storage and renewable energy generation.

IGO's nickel business includes the Nova and Forrestania Operations and the Cosmos Project, all of which are located in Western Australia. Nova and Forrestania are operating underground mining and processing operations, while Cosmos is a development stage project with first production expected in Q1 FY24.

Our lithium interests are held via our 49% interest in Tianqi Lithium Energy Australia Pty Ltd (TLEA), an incorporated joint venture with Tianqi Lithium Corporation (Tianqi). TLEA owns upstream and downstream lithium assets, including a 51% stake in the Greenbushes Operation and a 100% interest in a downstream processing refinery at Kwinana in Western Australia to produce battery grade lithium hydroxide.

IGO is also focused on discovering the mines of the future and has an enduring commitment to investing in exploration to ensure the world has a sustainable supply of clean energy metals into the future.

## Acknowledgements

We acknowledge the Traditional Owners of the lands on which we operate and on which we live. We recognise their connection to land, waters, and culture and pay our respects to their Elders past, present and emerging.



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# Executive Summary

1.1 Reporting Entities

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1.2 Mandatory Criteria

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1.3 Our Progress

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1.4 FY22 Overview

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1.5 FY22 Actions

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## 1.0 Executive Summary

IGO is committed to ending modern slavery. We uphold fundamental human rights and respect cultures, customs and values in all dealings with people, places and companies involved in our activities.

We believe we can combat incidences of modern slavery in our operations and supply chains through the adoption of responsible governance, comprehensive risk assessment and due diligence processes and remediation activities. Ongoing training and collaboration opportunities help support us to drive change in our industry.

This is IGO's third statement, published in accordance with the Australian Modern Slavery Act 2018 (Cth) (**Act**) for the financial year ending 30 June 2022 (**FY22**). The statement details the steps IGO has taken to assess modern slavery risks within our operations and supply chains, the actions we have taken to address those risks and how we evaluate the effectiveness of our actions.



### Target

8.7

Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers and by 2025 end child labour in all its forms.

IGO proudly supports the UN Sustainable Development Goals. Our work to address modern slavery risks in our operations and supply chains is helping to end modern slavery.

## 1.1 Reporting Entities

This statement is a consolidated joint statement that covers the activities of IGO and all entities within the IGO Group (refer to section 7 for more information).

The modern slavery risks and actions taken associated with projects, joint ventures, or companies which we did not operate during the reporting period (including IGO's lithium joint venture) are not included in this statement.

## 1.2 Mandatory Criteria

Legislative Requirement	Section	Page
Identify the reporting entity	1.1	3
Describe the reporting entity's structure, operations and supply chains	3	7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	4.2	16
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	4	13
Describe how the reporting entity assesses the effectiveness of these actions	5	23
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	7	26
<b>Additional Information</b>		
A summary of our achievements in FY22	1.5	4
Our commitments for FY23	6	25

### 1.3 Our Progress

IGO adopts a continuous review and improvement approach to our management of modern slavery risks. We recognise that the risks in our operations and supply chains are constantly changing and acknowledge that we have more work to do.

We are proud of our progress, and we are committed to making the changes necessary to address modern slavery risks in our business across five key areas:

- Corporate Governance
- Risk Assessment and Due Diligence
- Remediation
- Training; and
- Collaboration.

We have adopted the Walk Free Modern Slavery Benchmarking Tool framework to assess our progressive modern slavery activities.

	FY20	FY21	FY22
<b>Corporate Governance</b>			
Responsibility	<span style="color: green;">●</span>	<span style="color: green;">●</span>	<span style="color: blue;">●</span>
Strategy	<span style="color: orange;">●</span>	<span style="color: orange;">●</span>	<span style="color: orange;">●</span>
Policy Commitment	<span style="color: green;">●</span>	<span style="color: blue;">●</span>	<span style="color: blue;">●</span>
Policy Implementation	<span style="color: orange;">●</span>	<span style="color: green;">●</span>	<span style="color: blue;">●</span>
Reporting Processes	<span style="color: orange;">●</span>	<span style="color: green;">●</span>	<span style="color: blue;">●</span>
<b>Risk Assessment and Due Diligence</b>			
Risk Assessment Processes	<span style="color: green;">●</span>	<span style="color: green;">●</span>	<span style="color: green;">●</span>
Employment Practices	<span style="color: blue;">●</span>	<span style="color: blue;">●</span>	<span style="color: blue;">●</span>
Supplier Engagement and Due Diligence Processes	<span style="color: orange;">●</span>	<span style="color: green;">●</span>	<span style="color: green;">●</span>
Responsible Purchasing Practices	<span style="color: red;">●</span>	<span style="color: red;">●</span>	<span style="color: red;">●</span>
<b>Remediation</b>			
Grievance Mechanisms	<span style="color: blue;">●</span>	<span style="color: blue;">●</span>	<span style="color: blue;">●</span>
Response and Remediation Framework	<span style="color: red;">●</span>	<span style="color: orange;">●</span>	<span style="color: orange;">●</span>
<b>Training</b>			
Employee Training	<span style="color: red;">●</span>	<span style="color: orange;">●</span>	<span style="color: green;">●</span>
Supplier Engagement	<span style="color: red;">●</span>	<span style="color: orange;">●</span>	<span style="color: orange;">●</span>
<b>Collaboration</b>			
Cross-functional Collaboration	<span style="color: red;">●</span>	<span style="color: orange;">●</span>	<span style="color: orange;">●</span>
External Collaboration	<span style="color: red;">●</span>	<span style="color: red;">●</span>	<span style="color: orange;">●</span>

- Not yet addressed
- Developing
- Implementing
- Monitoring

### 1.4 FY22 Overview

We have not identified any actual instances of modern slavery in our operations or supply chains in this reporting period.

**In FY22 IGO's focus has been to:**

- Implement stronger risk assessment and due diligence processes
- Deliver modern slavery awareness training to targeted employees
- Engage in external collaboration activities to evaluate and mature our approach

### 1.5 FY22 Actions

Formalise the processes we follow to perform modern slavery due diligence on our proposed business partners	<span style="color: blue;">✓</span>
Review and refine the Initial Risk Assessment data assessment points	<span style="color: blue;">✓</span>
Continue to build our performance monitoring and evaluation system	<span style="color: blue;">✓</span>
Develop a Supplier Code of Conduct to ensure our Suppliers understand our expectations and management of modern slavery	<span style="color: blue;">↻</span>
Deliver targeted, risk-based training for departments within our business	<span style="color: blue;">↻</span>

# Our Purpose, Values and Strategy

2.1 Our Purpose

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2.2 Our Values

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2.3 IGO Strategy

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## 2.1 Our Purpose

We believe in a world where people power makes amazing things happen.

Where technology opens up new horizons and clean energy makes the planet a better place for generations to come.

Our people are bold, passionate, fearless and fun – we are a smarter, kinder and more innovative company.

Our work is making fundamental changes to the way communities all over the world grow, prosper and stay sustainable. Our teams are finding and producing the products that will make energy storage mobile, efficient and effective enough to make long-term improvements to the lifestyle of hundreds of millions of people across the globe.

How? Developments in battery storage technology are enabling the full potential of renewable energy to be realised by allowing energy produced from the sun, wind and other sources to be stored and used when and where it's needed. This technology will impact future generations in ways we cannot yet imagine, improving people's quality of life and changing the way we live.

We believe in a green energy future and by delivering the products needed for tomorrow's battery systems, we are making it happen.

**We are the IGO Difference.**

## 2.2 Our Values



### Be Better Together

We empower, support and respect each other. We act safely and with care, to the strengths of our people.



### Ignite The Spark

We seek, question, innovate and create. We know that without a burning curiosity and bright thinking, we risk missing the really big opportunities.



### See Beyond

We know that our actions today will impact the world of tomorrow. We believe our people, community and the environment really matter.



### Run Through The Sprinklers

We find the fun in what we do. When our workplaces are healthier and happier, we are better.



### Never Stand Still

We are bold, adventurous and excited for the future. We imagine new opportunities and seek new horizons.

## 2.3 IGO Strategy

Informed by our purpose, our strategy is to become a globally relevant supplier of products that are critical for clean energy – to create a better planet.

We are committed to delivering this strategy by:

- producing a diverse suite of products made safely, ethically, sustainably and reliably
- connecting with end users through vertical integration
- committing to being carbon neutral; and
- engaging with our people who are bold, passionate, fearless and fun – a smarter, kinder, more innovative team.



Section 3

# Company Structure

**3.1 Operations**

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Employees

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**3.2 Supply Chains**

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### 3.0 Company Structure

IGO is an ASX 100 listed company headquartered in South Perth, Western Australia with projects across Australia and overseas. IGO is the parent company for several Australian-based entities (refer to section 7 for more details).

IGO Newsearch Pty Ltd manages the majority of IGO's exploration activities and IGO Nova Pty Ltd operates the Nova Operation.

In FY22, IGO commenced a process to acquire Western Areas Limited (**WSA**), including the Cosmos Project and Forrestania Operation. IGO completed the acquisition of WSA on 20 June 2022 and it now forms part of the IGO Group under IGO Nickel Holdings Pty Ltd. WSA was listed on the Australian Securities Exchange (ASX) in July 2000 and was a member of the ASX 300. WSA was delisted from the ASX on 22 June 2022.

This IGO Group joint statement has been prepared for the FY22 reporting period including the period up to 20 June 2022 during which WSA operated independently.

### 3.1 Operations

IGO is a leading independent producer of nickel concentrate products and owns and operates a portfolio of projects spanning exploration, feasibility, development and production assets substantially located in Western Australia.

Following the acquisition of WSA in June 2022, IGO's key nickel production assets include the Nova and the Forrestania Operations, both underground mining and processing operations which have long histories of successful operating and financial performance. The Cosmos Project is an underground development project which is forecast to produce its first nickel concentrate in Q1 FY24.

In addition, as part of our strategy to connect with end users via vertical integration, IGO is assessing the opportunity to develop a downstream nickel processing operation to produce battery grade nickel sulphate for the lithium-ion battery industry.

IGO is also focused on discovering the mines of the future through its regional exploration projects and has an enduring commitment to invest in exploration to ensure the world has a sustainable supply of clean energy metals into the future.



#### Nova Operation (Nickel, Copper, Cobalt)

The Nova Operation (IGO 100%) is a high-grade nickel-copper-cobalt deposit located in the Fraser Range, approximately 140km east-northeast of Norseman, Western Australia. The Operation sits within the Great Western Woodlands. The Ngadju people are the Traditional Owners and custodians of this area, with their native title claim being recognised by the Federal Court on 21 November 2014. The Nova deposit was discovered in 2012 and the Operation reached commercial ore production capacity in 2017. Mining is conducted using underground stoping methods and processing comprises conventional crushing, grinding, flotation and filtration processes to produce high quality nickel and copper concentrates.



#### Forrestania Operation (Nickel)

The Forrestania Operation (IGO 100%) is 400km east of Perth, Western Australia and includes two underground mines, Flying Fox and Spotted Quoll and the Cosmic Boy processing facility. IGO acquired Forrestania as part of the acquisition of WSA which completed in June 2022.

Production from Forrestania commenced in 2006 and the Operation has successfully produced high quality nickel concentrates which have been sold under offtake to customers including BHP Nickel West and Jinchuan. Forrestania is a mature asset with an estimated life of mine to FY25.

IGO productively engages with the Ballardong people, the Maduwongga people, the Ngadju people and the Marilyn Ghoorlie people, the Traditional Owners of the Forrestania area and surrounding exploration programs.



#### Cosmos Project (Nickel)

The Cosmos Project (IGO 100%) is located 30km north of Leinster in Western Australia in one of Australia's premier nickel belts. IGO acquired Cosmos as part of the acquisition of WSA which completed in June 2022.

Nickel was first discovered at Cosmos in 1997 and has been previously mined via open pit and underground methods.

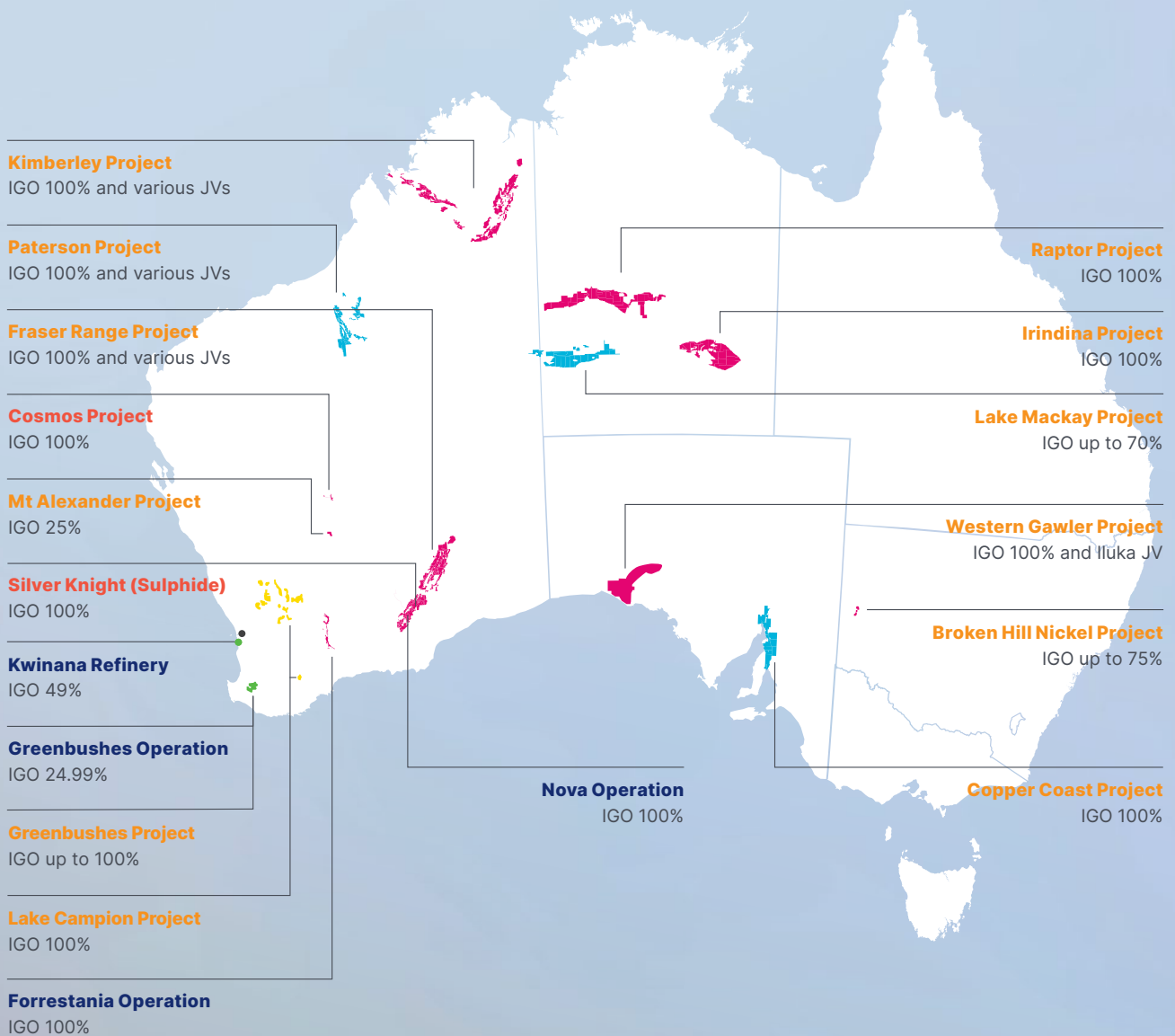
IGO's primary focus at Cosmos is the development of the Odysseus Underground Mine which is expected to deliver approximately 13,000t per annum over a mine life of 10 years. In addition, there is significant potential to extend the production profile through assessment of the large low grade resource at Mt Goode, which IGO is assessing as a potential future production source.

At Cosmos, IGO continues to foster a collaborative working relationship with the Traditional Owners of the land, the Tjiwarl people.

# Key Operations and Projects\*

- Head office Perth
- Operations
- Exploration projects
- Study/Construction
- Cu/Co/Au
- Ni/Cu/Co/Au
- Li<sub>2</sub>O
- Rare earth elements

\* Note that this map includes IGO's lithium interests held via our 49% interest in TLEA, an incorporated joint venture with Tianqi, which are reported on independently by TLEA. The latest Modern Slavery Statement for TLEA is available on the Online Register for Modern Slavery Statements under reporting entity Windfield Holdings Pty Ltd (ABN 60 160 456 164).



## Employees

We have an expanding team working on our regional exploration projects primarily in Western Australia and the Northern Territory with developing prospects in South Australia and New South Wales.

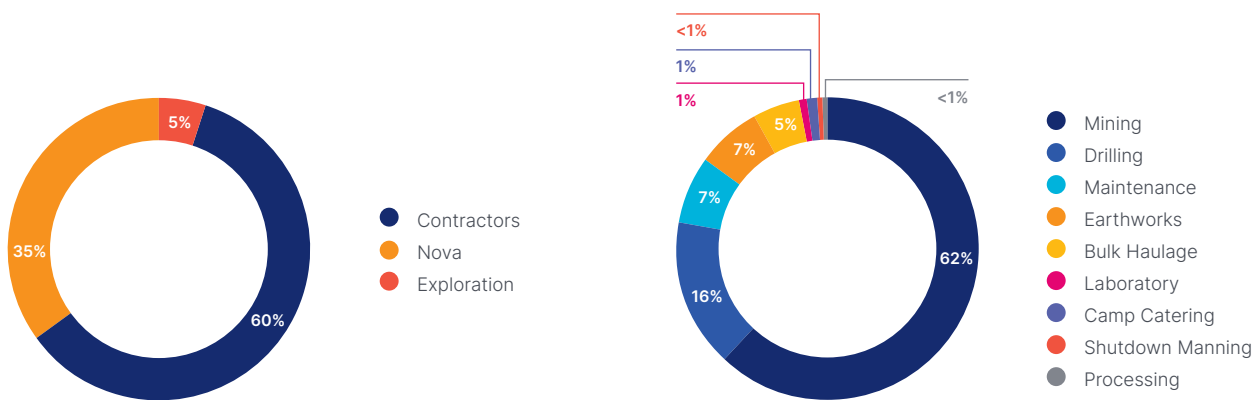
Personnel at our operations and projects include our operational personnel, our Exploration personnel working at or near the site and our Contractors. Contractor personnel make up most of our personnel on site at any one time. The charts below provide an indicative proportion of personnel from our operations teams, Exploration teams and various site contractors.

## Direct employees in FY22

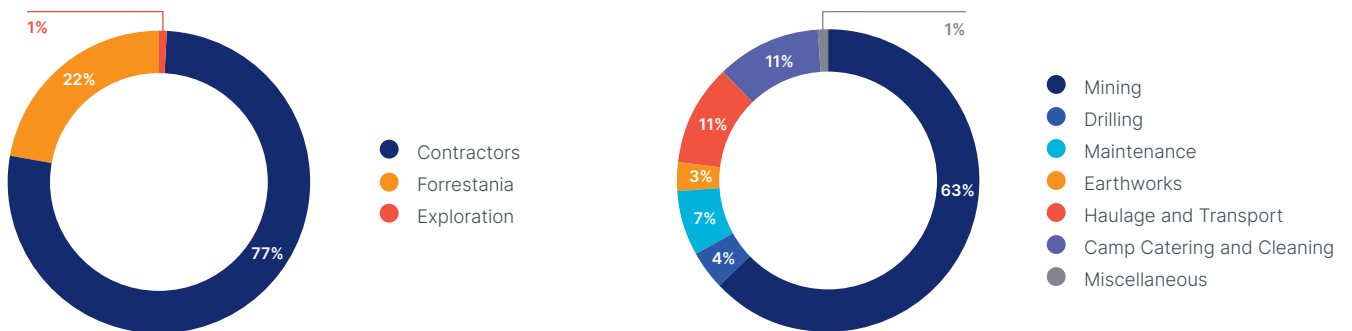
# 656

Our workforce is based at our Perth office, our regional exploration areas and at our Nova Operation, Forrestania Operation and Cosmos Project, which predominantly operate as fly-in fly-out sites.

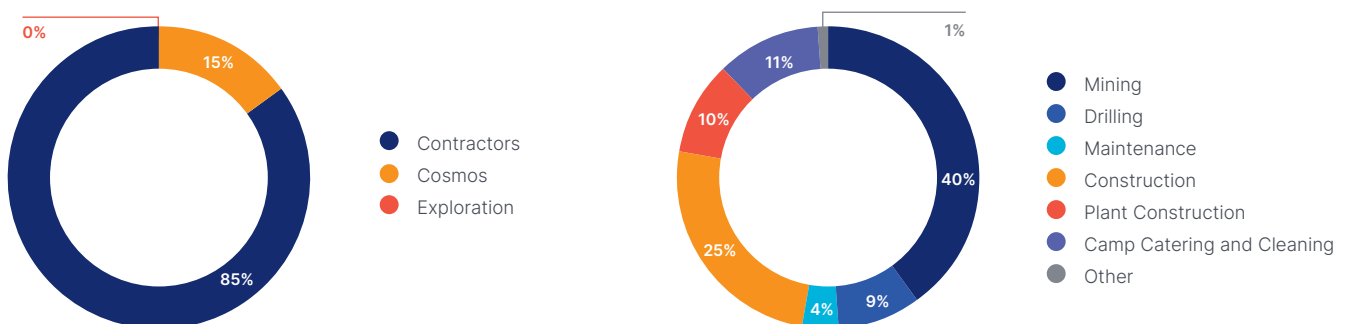
## Nova Personnel



## Forrestania Personnel



## Cosmos Personnel



## 3.2 Supply Chains

Our supply chain partners are crucial to IGO's success. We seek to engage like-minded suppliers and business partners who are, at a minimum, committed to operating in a safe, lawful and competitive manner.

**Tier 1 Suppliers** are suppliers that IGO directly engages to provide goods and services to support our operations. **Tier 2 Suppliers** are suppliers that are engaged by IGO's Tier 1 Suppliers to provide goods and services in support of IGO's operations.

A snapshot of our procurement spend for the FY22 period is set out below. The spend includes existing IGO Group entities and WSA entities that operated independently until the acquisition on 20 June 2022<sup>1</sup>. All figures are in Australian Dollars and exclusive of any applicable GST.

In FY22, IGO's Tier 1 Supplier spend was \$658.2m across Corporate, Exploration and our operations (Nova and Forrestania) and projects (Cosmos). We worked with over 1,700 Tier 1 Suppliers who primarily operate out of Australia. Some of our shipping providers are headquartered internationally.

IGO sources substantial goods and services to support the mining lifecycle throughout exploration, mining, production, processing and shipping. Our higher spend categories are listed in Table 1.

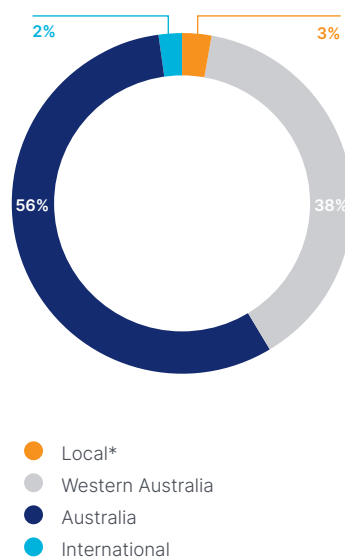
<sup>1</sup> Refer to section 7 for a current list of IGO Group entities. Prior to the WSA acquisition, WSA group entities included Western Areas Limited; Western Platinum NL; Australian Nickel Investments Pty Ltd; Bioheap Ltd; and Western Areas Nickel Ltd.

**Table 1: Higher Spend Categories**

Category	Total Spend (AUD)	No. of Suppliers*
Mining	\$220M	8
Fuel and Power Supply	\$71M	25
Haulage and Transport	\$42M	15
Processing Services and Reagents	\$37M	23
Professional Services and Miscellaneous Vendors	\$33M	73
Camp Services and Labour Hire	\$31M	45
Capital and Infrastructure	\$25M	15
Maintenance Services Contracting	\$24M	50
Civil Works and Site Ancillary	\$22M	35
Drilling Services	\$21M	16
Shipping	\$15M	5
Consumables	\$9M	38
Information Technology and Software	\$7M	18
Geological Services	\$6M	15

\* This table includes any supplier with a spend of >\$100K for an IGO or WSA entity during the reporting period and may include duplicate suppliers across individual entities.

### FY22 Supplier Spend Relative To Our Operations (Percentage)



\* Local suppliers are included in Western Australia figures for WSA entities.

IGO values our relationships with local suppliers – from the suppliers local to our operations to our Western Australian and Australian suppliers.

## FY22 Distribution of Payments to Suppliers (A\$ million)

Highlights	Local*	Western Australia	Australia wide	International	Total
Suppliers of goods and service – WSA Corporate and Forresteria	-	29.8	185.1	5.0	<b>219.9</b>
Suppliers of goods and service – Nova Operation	7.0	157.5	36.9	9.4	<b>210.8</b>
Suppliers of goods and service – Cosmos	-	33.8	116.8	<0.1	<b>150.6</b>
Suppliers of goods and services – IGO Corporate Office	6.1	12.7	31.1	-	<b>49.9</b>
Suppliers of goods and services – Exploration Projects	6.9	19.5	0.1	0.2	<b>26.7</b>
Suppliers of goods and services – BioHeap	-	<0.1	0.3	-	<b>0.3</b>
<b>Total</b>	<b>20.0</b>	<b>253.1</b>	<b>370.2</b>	<b>14.6</b>	<b>658.2</b>

\* Figures have been rounded to the nearest \$100K and local suppliers are included in Western Australia figures for WSA entities.



# Our Approach

## 4.1 Corporate Governance

Accountability

Human Rights Policy

Code of Conduct

Speak Up Standard

Our Actions and Progress

Looking Ahead

## 4.2 Risk Assessment and Due Diligence

Operational Risks

Supply Chain Risks

## 4.3 Remediation

Our Actions and Progress

Looking Ahead

## 4.4 Training

Our Actions and Progress

Looking Ahead

## 4.5 Collaboration

Our Actions and Progress

Looking Ahead



## 4.0 Our Approach

IGO is working hard to identify and address modern slavery risks in our business. In the first year of reporting, we engaged an independent advisory firm to undertake several risk reviews of our operations and supply chains. The reviews provided a baseline assessment of our risks and some initial insights into our supply chains. In the second year of reporting, we began to construct effective governance processes and work through a comprehensive action plan.

In FY22, IGO has focused on implementing stronger risk assessment and due diligence processes, delivery of employee training and external collaboration. We have structured our approach and reporting into five key areas:

- Corporate Governance
- Risk Assessment and Due Diligence
- Remediation
- Training; and
- Collaboration.

The revised structure aligns with best practice guidance and allows us to better focus our efforts and demonstrate year-on-year improvement.

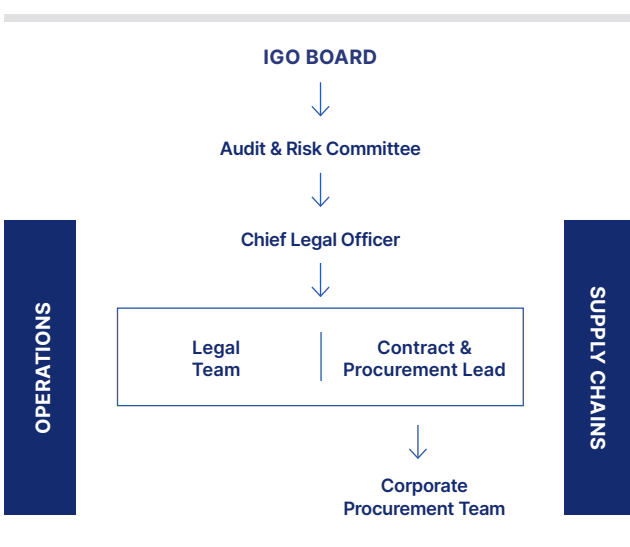
For the FY22 reporting period up to 20 June 2022, WSA operated under its own corporate governance and risk management framework. On and from the acquisition date, all WSA entities are subject to IGO's corporate governance, reporting and modern slavery risk management processes.

## 4.1 Corporate Governance

IGO has developed a strong framework to manage our modern slavery governance. Our key documents include our Human Rights Policy, Code of Conduct and Speak Up Standard, available in the Governance section of our website at <https://www.igo.com.au/site/our-business/governance>. Our Board undertakes an annual review of our policies and common management system standards.

### Accountability

Our Board is accountable for supporting the long-term sustainability of the business through realising our purpose and delivering on our strategy and creating enduring value for all our stakeholders in an ethically and socially responsible manner.



Whilst the Board is responsible for the Company's corporate governance, we do not see governance as just a matter for the Board. We believe good governance is about doing the right thing and this responsibility is owned by all those who work at IGO.

Good governance is instilled in our culture and is integral to the way we operate and live the IGO values. We are dedicated to maintaining the highest standards of corporate governance and our policies and practices drive continual improvement and enable effective and responsible decision-making.

The Board has ultimate responsibility for IGO's modern slavery governance and risk management. The Audit & Risk Committee maintains overarching responsibility for IGO's legal and regulatory compliance. IGO's Board delegates responsibility for compliance with the Act and execution and implementation of IGO's modern slavery obligations to the Chief Legal Officer. IGO's Legal and Corporate Procurement teams work together to identify and address modern slavery risks throughout our business.

IGO's Chief Legal Officer and Legal team maintains responsibility for assessment and due diligence relating to our broader operational risks.

The Chief Legal Officer assigns responsibility for modern slavery due diligence relating to IGO's supply chains to senior management in the Corporate Procurement team with support from a dedicated modern slavery resource in the Legal team. The Contract & Procurement Lead works together with the Corporate Procurement and Legal teams to conduct supply chain risk assessments and governance activities.

For more detail about our wider governance and management standards, refer to **our website** and our **2022 Corporate Governance Statement**.

### Human Rights Policy

IGO's policies establish the overarching framework, approach and specific aims for how our business operates. Our Human Rights Policy addresses seven key aims for our management of human rights, encompassing our modern slavery obligations:

- Observe basic human rights recognised in the Universal Declaration of Human Rights
- Commit to a continuous improvement approach for modern slavery risk identification, risk management and supplier engagement
- Refuse to tolerate any form of modern slavery in our operations or supply chains
- Prohibit all forms of bribery and corruption and offer strong protection to individuals who report any breaches
- Recognise and respect Aboriginal cultural heritage and collaboratively work with Aboriginal communities affected by our operations; and
- Maintain a strategic focus on continuous learning and development to ensure our business practices are aligned with our obligations and values.

### Code of Conduct

IGO actively promotes ethical and responsible decision-making by clearly stating our purpose and our values in our Code of Conduct. Our Code of Conduct guides the standard of behaviour expected from our people. The Code of Conduct applies equally to our Board, our employees, our suppliers and our contractors.

During FY22, we undertook a full review of our Code of Conduct, which resulted in a simplified document that focuses on the minimum standard of behaviour that we expect of all our people working for and on behalf of IGO. It is designed to be an easy-to-use tool to help our people make decisions at work that



are aligned with our purpose and values and the way IGO wants to conduct business.

IGO's Code of Conduct imposes a responsibility on individuals to report breaches of the Code either internally or through the Company's external reporting service.

There were no reported Code of Conduct breaches relating to modern slavery or human rights issues in FY22.

### Speak Up Standard

IGO is committed to creating and maintaining a safe and inclusive work environment where everyone feels comfortable to raise concerns about actual or suspected misconduct without fear of reprisal or detrimental treatment. We are committed to encouraging a 'speak up' culture consistent with our purpose, values and culture of care.

IGO's Speak Up Standard enables our people, suppliers, contractors, tenderers and/or any other person who has business with IGO to report confidentially any significant concerns about the business or behaviour of individuals. This could include suspicion around business integrity and corporate governance, financial reporting, safety and environmental concerns or human rights.

In FY22, we improved the way our people can raise concerns by introducing a new independent external reporting platform called Your Call and updating our Speak Up Standard. The new platform allows people to raise concerns about actual or suspected misconduct anonymously via the online platform.


There were no reports of modern slavery or human rights issues raised via the Speak Up platform in FY22.


**SpeakUp  
Protection Officers**

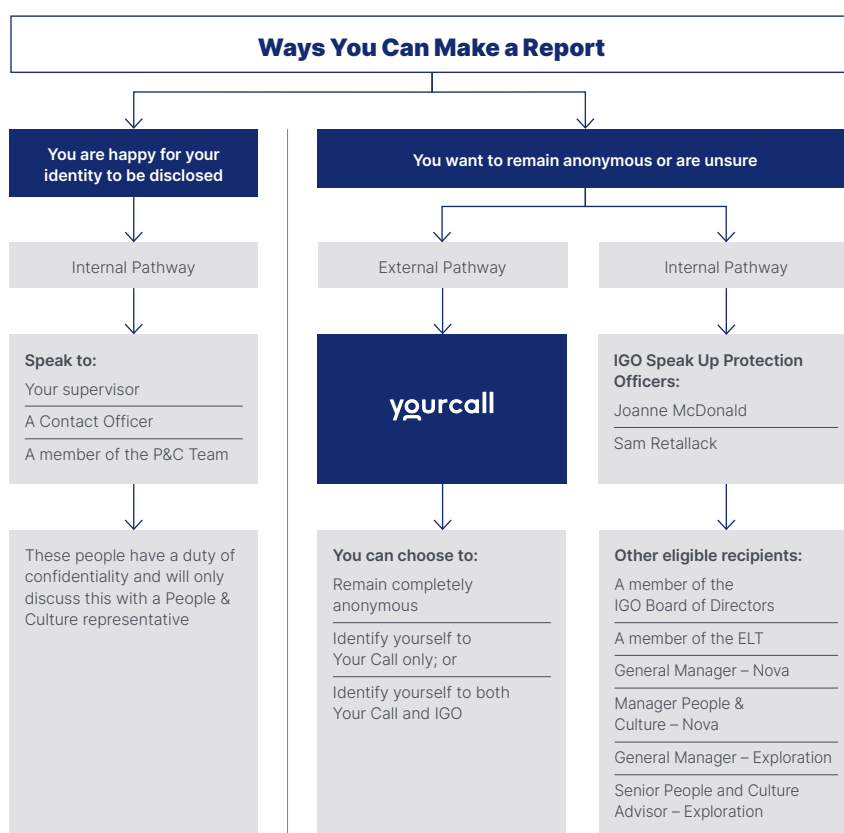
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Available 24/7  
Use unique identifier code "IGO"



### Our Actions and Progress

In FY22, IGO committed to the development of a separate Supplier Code of Conduct to reflect best practice governance. We want to clearly communicate our expectations to our suppliers, including our expectations in relation to modern slavery issues and the available reporting mechanisms.

As outlined above in section 4.1, we completed a review and updated our Code of Conduct. This Code applies to everyone who works for or on behalf of IGO, including our suppliers. We plan to progress the Supplier Code of Conduct in FY23.

### Looking Ahead

In FY23, IGO will finalise and publish the new Supplier Code of Conduct and promote it to our suppliers. We will also review our grievance mechanism and consider ways in which we can improve our external grievance reporting process to more effectively respond to the concerns of people impacted by our business and practices, including the suppliers and workers in our supply chains.

## 4.2 Risk Assessment and Due Diligence

The establishment of effective risk assessment and due diligence practices are fundamental to our ability to identify and address modern slavery. IGO has developed strong processes to manage the modern slavery risks in our operations and supply chains.

In FY22, three key factors influenced global modern slavery risks: the ongoing COVID-19 pandemic; geopolitical conflicts; and natural disasters and climate change. These factors are addressed in the operational risks and supply chain risks sections below.

### Operational Risks

IGO's operations are primarily based in Australia. Table 2 provides a summary of the key operational risks in the global extractives industry.

**Table 2: Key Operational Risks in the Extractives Industry**

Risk	Description
Contracted and subcontracted labour	Decreased visibility / oversight of contracted and sub-contracted labour increases the risk of modern slavery, particularly in the form of forced labour
Demand volatility	Resource demand volatility causes fluctuations in demand – affecting production, work force size and working hours, as well as creating labour hire cost pressures
Business practices	Aggressive price negotiation, inaccurate forecasting, late orders, short time leads and last-minute changes to orders may cause pressure on contractors and subcontractors to meet demand and negatively impact working conditions
Instances of labour exploitation	Labour exploitation has occurred in the resources sector, particularly in jurisdictions with less stringent regulatory requirements to protect the rights of workers
Recruitment agencies	Recruitment agencies may charge workers, often migrant workers, recruitment or hiring fees, subjecting workers to modern slavery in the form of debt bondage

Our corporate office, exploration activities, projects and remote mine sites are subject to stringent and professional management practices and controls. In Australian mining, modern slavery is more likely to be in the form of forced labour or debt bondage resulting from the use of contracted and subcontracted labour and third-party recruitment agencies. We consider that the overall risk of modern slavery in our operations is low, but we recognise that higher risks may emerge in our operations through future expansions, acquisitions and investments.

IGO's overall operational risk profile was not materially affected by COVID-19. In addition to our existing flexible work practices, we introduced hybrid working arrangements for our Corporate staff and encouraged or directed employees to work from home in accordance with government advice. Regular site rosters were maintained as we introduced COVID-19 testing and other controls. We introduced generous COVID-19 leave entitlements for all employees.

IGO acknowledges the impact of global geopolitical conflicts, natural disasters and climate change on increasing the prevalence and number of modern slavery victims. We did not identify any specific or direct impact to the risk profile of our primarily Australian-based operations or prospects.

### Our Actions and Progress

#### Business Partners and Acquisitions

IGO undertakes comprehensive due diligence of our proposed business partners and acquisition targets, which includes consideration of potential human rights issues and modern slavery risks. For example, we review a range of data sources to determine if there are any issues associated with a company's past or current business practices that represent a risk of any form of modern slavery.

In FY22, we committed to formalise the processes we follow to perform modern slavery due diligence on potential business partners or acquisitions and drafted internal processes to consider when conducting due diligence. We determined that our existing processes are sufficient due to the high level of expertise involved.

#### Employment Practices

Our people are fundamental to delivering our business strategy. IGO's unique culture has a strong embedded purpose and values and is an important part of our business which sets us apart from our industry peers. Our people are our difference and we continue to work together to inspire, empower and respect each other to ensure we achieve our purpose of Making a Difference.

Our employment practices ensure that our employees do not face exploitative treatment such as slavery, forced labour, or servitude. We used the Walk Free Modern Slavery Benchmarking Tool to review our employee practices and protections.

For more information about IGO's systems and processes, refer to our 2022 Sustainability Report and Code of Conduct available on our [website](#).

## Walk Free Modern Slavery Benchmarking Tool: Employment Practices

Are workers paid a living wage?	We pay competitive market salaries to secure talented employees. We undertake annual remuneration reviews for all employees that consider factors such as industry benchmarking and CPI.	✓
Are workers paid their wages and other benefits on time?	We pay all wages and benefits in accordance with periodic pay dates and standard accounting processes and procedures.	✓
Are workers required to work excessive overtime?	Our Corporate employees generally work business regular hours with reasonable overtime on an as required basis. Our site and Exploration employees work on fixed-length rosters and are subject to stringent fatigue management processes that prohibit excessive overtime.	✓
Do workers pay recruitment fees or other fees to get the job?	Employees never pay fees to gain employment with IGO. Our internal recruiters conduct all direct employee recruitment processes. We prohibit the use of recruitment fees for temporary labour arranged by third-party labour hire companies.	✓
Are workers in situations of debt bondage?	Employees are never charged accommodation or travel costs for their employment with IGO. We employ people local to our corporate office. We arrange and provide all accommodation and transport for our site and Exploration employees from their designated point of hire.	✓
Do workers have safe and sanitary working and living conditions?	We are committed to providing a safe and healthy place of work and safe systems of work. All employees must be fit for work. Our people and workplaces are subject to management controls such as our Safety & Wellbeing Policy, Mental Health & Wellbeing Strategy and Safety & Wellbeing Risks Standard. We provide fit for purpose accommodation facilities that are regularly cleaned for our site and Exploration employees.	✓
Do workers have contracts in a language they understand?	Our employees are provided written contracts drafted in English.	✓
Do workers have access to passport / ID documents at all times?	We verify our employees' identities, but we never retain their original identity documents such as their passport or driver's licence.	✓
Are workers free to leave their employment or accommodation at all times?	We do not restrict the movement of our employees at any of our worksites.	✓
Do we ensure workers' interests are adequately represented, including by respecting worker rights to join trade unions or workers associations?	In accordance with our Human Rights Policy, we uphold the fundamental human rights of all people we engage with in our business and observe the Universal Declaration of Human Rights, including the right of our employees to form and join trade unions.	✓
Are all workers' ages checked and child labour prevented?	We verify the identity of all our employees and prohibit child labour in our operations.	✓
Does discrimination occur in the workplace?	<p>We do not tolerate bullying or any form of harassment including sexual harassment, discrimination, victimisation or intimidation of any kind or any other type of unwelcome behaviour.</p> <p>We have policies, procedures, training and support for our employees to prevent discriminatory practices in our workplace, for example:</p> <ul style="list-style-type: none"> <li>• Diversity and Equal Opportunity Standard</li> <li>• Discrimination, Harassment and Bullying Procedure</li> <li>• Grievance Resolution Standard; and</li> <li>• Speak Up Standard.</li> </ul>	✓



### Case Study: Recruitment Agencies

IGO's total FY22 spend on labour hire for our Corporate, Exploration and Nova teams is \$1.1m, which represents less than 1% of our overall spend for this period and a significant reduction of \$3.7m since FY21. Our labour hire spend is with three large and reputable Australian companies.

Our operations receive additional support from companies who offer specialised temporary personnel. Specialised, locally sourced temporary labour is less likely to be subject to forced labour conditions. IGO has measures in place to address modern slavery risks in relation to our use of recruitment agencies. For example, we expressly prohibit the use of recruitment fees to reduce the risk of temporary personnel being subjected to situations of debt bondage. We also expressly prohibit the companies providing temporary labour from destroying or exclusively holding the travel or identity documents of temporary personnel.

## Looking Ahead

In FY23, IGO plans to undertake a review of our commercial practices and decision-making processes. We seek to understand if our practices and processes constrain our ability to undertake appropriate due diligence activities or negatively impact the working conditions or performance of our contractors. We will aim to develop and implement any improvements necessary to reduce these impacts.

## Supply Chain Risks

IGO's Supplier Risk Assessment and Management Process is set out below, which continues unchanged from the process we established in FY21. We completed a baseline risk assessment for all existing suppliers in our previous reporting period. For existing suppliers and prior to onboarding new suppliers, we assign each a low, medium or high modern slavery risk rating via our Initial Risk Assessment process. Our Initial Risk Assessment methodology is set out on page 19.

This assessment does not determine any specific form(s) of modern slavery but reflects an overall assessment of inherent modern slavery risk. We request any high-risk suppliers to complete a Self-Assessment Questionnaire (SAQ) to obtain more detailed information about the supplier and help determine the specific form(s) of modern slavery potentially present in their operations and supply chains.

IGO's Tier 1 suppliers are based in Australia apart from our shipping partners (see section 3.2 for more information). As a result, IGO's overall Tier 1 supply chain risk profile was not

materially affected by COVID-19. IGO also acknowledges the impact of global geopolitical conflicts, natural disasters and climate change on increasing the prevalence and number of modern slavery victims. There were limited commercial impacts resulting from general supply chain disruptions due to a combination of these factors, but our purchasing practices remained consistent.

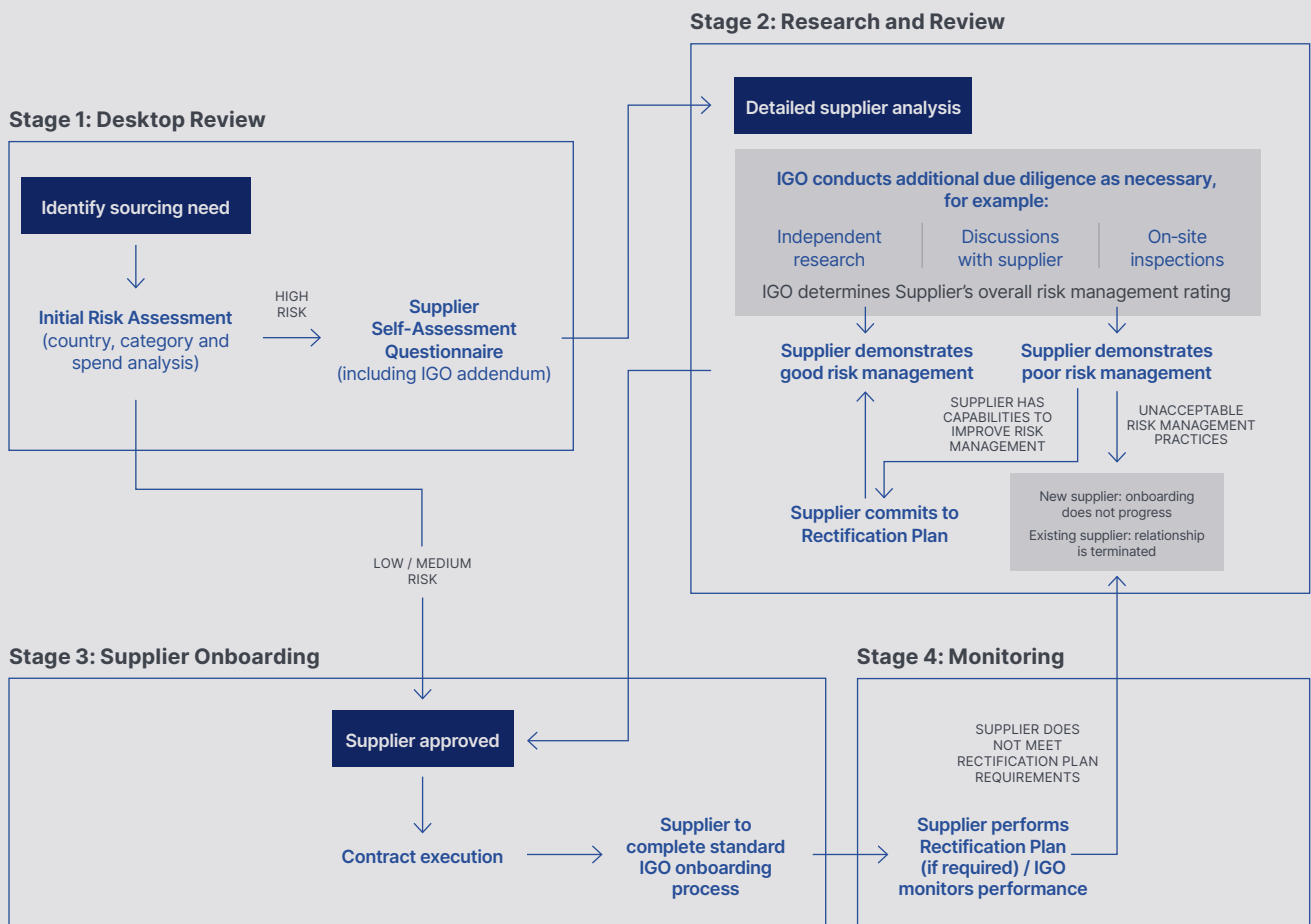
We did not identify any specific or direct impact to the risk profile of our primarily Australian-based supply chains. However, seafarers in the marine shipping sector were severely impacted by government-imposed COVID-19 restrictions that prevented seafarers from disembarking at ports around the world. This resulted in the creation of forced labour conditions for seafarers including extended crew rosters, excessive overtime and lack of shore leave.

## Contracting Arrangements

Our procurement contracts include standard terms and conditions that require our suppliers to take reasonable steps to identify, assess and address modern slavery risks and notify us of any modern slavery practices in their operations or supply chains. We are permitted to undertake supplier verification activities. We require our suppliers to place similar obligations on their own suppliers.

Our contracting templates include a right for us to terminate the contract if a supplier fails to adequately manage or take reasonable action to address modern slavery issues.

## Supplier Risk Assessment and Management Process



## INITIAL RISK ASSESSMENT: METHODOLOGY

For our initial risk assessment, we conduct a desktop review of each supplier based upon country risk and category risk.

To determine **country risk**, internationally recognised databases, indices and reports are utilised to assess the countries in which IGO's Tier 1 Suppliers operate.<sup>2</sup>

To determine **industry risk**, each Tier 1 Supplier is assigned a category in line with the Global Industry Classification Standard (**GICS**). There are 158 GICS sub-industry categories that consider various factors such as skill level; level of industry regulation; presence of migrant labour; and presence of opaque intermediaries.

The overall inherent modern slavery risk score for each Tier 1 Supplier is calculated utilising the country risk score and the industry risk score. We analyse overall spend and consider it as a risk mitigation factor.

<sup>2</sup> Resources included UNICEF (2019), *Child Marriage, International Labour Organisation (ILOSTATE) (2019), Statistics on forced labour, modern slavery and human trafficking* and Walk Free Foundation (2018) and The Global Slavery Index 2018.

## Our Actions and Progress

### Supplier Risk Assessments

In FY22, IGO completed 206 new supplier modern slavery risk assessments and found that less than 2% of our new suppliers were identified as high risk. This is consistent with our finding that across FY21 and FY22, less than 2% of our combined existing, new and prospective suppliers were identified as high risk.

IGO maintains a risk register to record our risk ratings and track any associated actions such as SAQ status and detailed supplier analysis. We use the risk register to help us understand the specific industries, suppliers and work scopes that represent our highest and most common risks. As part of IGO's ongoing risk assurance activities, we undertook a review to determine if any suppliers had been onboarded without a risk assessment and rectified as necessary.

IGO continues to collaborate with our marine shipping broker to improve our understanding of the marine shipping sector, the various parties and participants in this extended supply chain and work to address the specific risks present in this sector.

In FY21 our high-risk supplier categories included consumables, diversified support services (provision of personnel) and marine shipping services. Similarly, in FY22 our higher-risk categories

included consumables, diversified support services (industrial support and commercial cleaning) and marine shipping services. IGO has not yet identified any specific non-conformances or corrective actions required by any of our suppliers.

**Consumables** may be recognised as high-risk because even if IGO's direct suppliers are located in Australia, sourcing and manufacturing of many materials often occurs in other jurisdictions with far less regulation and oversight, particularly in the extraction of raw materials used for manufacturing processes and construction. Workers may have fewer general protections and are more likely to be subject to some form of modern slavery such as human forced labour, debt bondage and human trafficking.

**Diversified support services** require the provision of personnel for different types of on-site roles, for example in maintenance services, contract catering, accommodation or facility management. Labour hire and other short-term contract work in this industry can be high-risk due to the temporary nature of the work and the lack of visibility over the hiring process. The use of migrant workers combined with strong pressure to reduce costs may increase the risk of modern slavery, particularly in the form of forced labour and debt bondage. However, as noted in our operational risks, IGO's use of temporary labour sourced from recruitment agencies has substantially reduced in FY22.

The **marine shipping** industry is high-risk due to the use of complex international supply chains and contracting arrangements and the lack of appropriate policies and procedures to manage these complexities. Modern slavery may be prevalent in the lack of general protections for workers, the payment of wages that are below industry standards or unacceptable living and working conditions. The inherent risks in this industry were further exacerbated by the imposition of COVID-19 restrictions that prevented seafarers from disembarking at ports and extended crew rosters, creating forced labour conditions.

### WSA Supplier Risk Assessments

In FY21, WSA conducted a review of its operations and supply chains and prepared a comprehensive modern slavery risk register. This risk register considers the key modern slavery risks, impacts and controls in place to manage these risks. No further amendments were made to the risk register in FY22.

Key modern slavery risks identified include:

- marine shipping
- raw materials suppliers; and
- temporary personnel.



## Case Study: Solar Panels

IGO aspires to be carbon neutral across our direct operations and activities by 2035, if not sooner. Our pathway to carbon neutrality needs to incorporate all aspects of our business and value chain, essentially targeting our total carbon footprint (for more information, refer to IGO's 2022 Sustainability Report available on our [website](#)).

In 2019, we commissioned a 5.5MW Solar Farm at our Nova Operation, displacing approximately 6,500t of CO<sub>2</sub>-emissions. However, electricity generation at the Nova Operation contributes 80% of our total Scope 1 emissions profile.

In FY22, IGO committed to expanding our Nova Solar Farm to reduce our Scope 1 emissions associated with power generation, with the addition of a 10MW solar panel and 10MWh battery storage system. The expanded system will allow our Nova Operation to successfully operate 'engines off' for up to nine consecutive hours a day in the spring and summer months. The associated reduction in diesel consumption at Nova is estimated at 4.2M litres per annum, displacing ~11,500t CO<sub>2</sub>-e per annum.

During FY22, IGO commenced commercial negotiations for a contract to expand the Nova Solar Farm. There is an inherent high risk of modern slavery, particularly forced labour, in the global supply chains of solar panels and battery products. Due to this high level of risk, we engaged with the supplier and conducted detailed due diligence of its supply chain. We did not identify any direct evidence of forced labour from the manufacturer's operations. The raw material supply chain of solar products is also at risk, but we did not identify any evidence to indicate that there were any actual instances of modern slavery.

We elected to manage the potential risks through the introduction of prevention and mitigation strategies, including commercial terms regarding the supplier's obligations to maintain appropriate modern slavery risk assessment and management processes.

## Initial Risk Assessment Data Sources

In FY22, IGO committed to continue to review and refine the Initial Risk Assessment data sources to ensure a valid basis upon which our risk assessments are made. We completed this internal review and determined that we require more dynamic data sources.

IGO engaged with specialist providers working in this sector. IGO conducted a comprehensive review of available software options that could deliver an effective screening tool for our Initial Risk Assessment process. We selected a preferred supplier and finalised commercial negotiations in Q4. We will implement the new solution in FY23.

## Looking Ahead

In FY23, we will implement a new risk assessment screening tool that will provide detailed insights into our supply chain risks and help us better understand any potential adverse impacts for which we are responsible. The implementation will require us to conduct a new baseline risk assessment of all our existing suppliers, including the suppliers of our newly acquired WSA company. Once implementation is complete, we may need to review our risk management processes and incorporate updated controls.

IGO will continue to engage and collaborate with our suppliers about specific issues that arise from our risk assessment and due diligence processes, particularly in the sectors that we identify as higher risk. We will conduct risk assurance checks to ensure that our processes are effective, efficient and produce meaningful outcomes.

## 4.3 Remediation

Once an adverse impact is identified, remediation is the crucial final step to address the modern slavery risk.

### Our Actions and Progress

Since our first reporting period in FY20, IGO has not yet identified that we have caused or contributed to any instances of modern slavery. To date, we have not been directly linked to any adverse impacts. We do not have any Supplier Rectification Plans in place.

Our Speak Up Standard contains a step-by-step guide to our grievance investigation and resolution process and is publicly available on our website. However, no modern slavery issues have been raised via our grievance resolution process.

With no issues yet requiring remediation, our focus has been to prevent and mitigate potential adverse impacts through activities such as desktop reviews, due diligence and strong commercial terms.

## Looking Ahead

In FY23, we will undertake a review of the Walk Free and Human Rights Resource and Energy Collaborative (HRREC) Modern Slavery Response and Remedy Framework along with other best practice guidance as we continue to formulate our own remediation framework.

## 4.4 Training

In accordance with IGO's Human Rights Policy, we focus on continued learning and development for all employees to ensure our business practices are consistent with our values to promote and uphold the rights and dignity of all people. Building awareness across our business about modern slavery and its potential prevalence in our operations and supply chains is a critical first step to eradicate it.

### Our Actions and Progress

Throughout FY22, we provided different forms of training to meet the needs of our business, including a modern slavery awareness training module, internal communications and professional development activities.

#### Modern Slavery Awareness Training for Employees

In FY21, IGO developed a concise human rights and modern slavery awareness training package to build awareness of modern slavery and the impacts of our procurement decisions. Our internal modern slavery resource delivered this training to our Corporate Procurement Team.

In FY22, IGO committed to deliver targeted, risk-based training for other departments within our business. Consistent with our general approach to modern slavery, we continually review and revise our training content to ensure that it remains relevant to our business and reflects the changing nature of global modern slavery risks such as COVID-19, geopolitical conflicts and natural disasters and climate change.

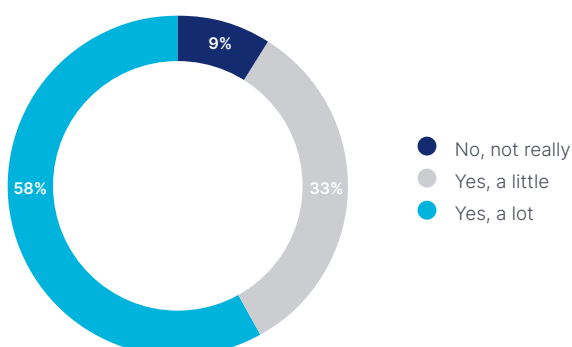
At a minimum, our training package includes:

- definitions and forms of modern slavery
- examples of how modern slavery may arise in our operations and supply chains
- a summary of the Modern Slavery Act 2018 (Cth)
- IGO's obligations under the Act, our actions and our future commitments
- obligations of employees in our business; and
- mechanisms for employees to raise any queries or concerns (e.g. via the IGO Speak Up platform – see section 4.1).

In FY22, we targeted key personnel from across our business who are involved in procurement processes and decision-making. Our dedicated modern slavery resource delivered training to 85% of targeted personnel, which represents around 10% of our overall workforce.

To help us evaluate the effectiveness of our employee training module, we measured whether it improved participants' awareness and understanding of modern slavery risks. 91% of participants reported that the training module improved their understanding of modern slavery.

#### Improved Understanding



#### Internal Communications

In addition to our formal training module, we regularly share internal communications about modern slavery as part of our campaign to build awareness. In FY22, we published several articles for our employee newsletter about our work and progress, how to spot modern slavery and spotlights on specific forms of modern slavery.

#### Professional Development

IGO provides ongoing learning and development opportunities for people to grow their career and thrive. These opportunities also help us understand and assess the quality of our performance, actions and decisions against our peers and the global community to ensure our modern slavery risk management reflects best practice.

Our team undertakes both formal and informal professional development activities including:

- business sustainability management
- webinars, conferences and summits hosted by organisations such as the Australian Border Force, Anti-Slavery Australia and Freedom for Humanity; and
- industry collaboration opportunities.

#### Supplier Engagement

IGO continues to work with our suppliers to address modern slavery issues. While we do not currently deliver any formal supplier training, we share expertise and engage with our suppliers about key issues and actions.

#### Looking Ahead

In FY23, we will continue to deliver targeted, risk-based training to our employees. We will work towards achieving delivery of training to 100% of targeted personnel. We will assess the modern slavery awareness of employees in our newly acquired WSA operations and deliver any additional training as required. Further to our training module, we plan to publish an internal reference sheet for personnel involved in purchasing that identifies higher risk industries and countries relevant to our business.

To ensure the continued effectiveness of our training activities, we will:

- review the criteria used to determine which employees require training to ensure we target the right people
- develop a method for identifying and tracking training requirements for new employees and employees with new purchasing responsibilities; and
- consider what, if any, content changes are necessary to encourage improved understanding of modern slavery.

IGO will begin to develop a longer-term training strategy that considers training currency and frequency requirements and broadening the training offered across our business. For example, by including basic information about modern slavery in employee inductions and providing further training to assist employees to actively address risks.

We recognise that many of our suppliers are small and medium enterprises that may need assistance to manage and address modern slavery risks. As we continue to mature our own approach to modern slavery, we hope to offer additional support to our suppliers.

## 4.5 Collaboration

Modern slavery is a complex issue that traverses many aspects of society. Business attempts to tackle modern slavery must consider affected individuals as well as the impact of governments, industry peers and civil society groups. Collaboration promotes collective, targeted action leading to more effective outcomes in combatting modern slavery. In FY22, we committed to actively seek collaboration opportunities.

### Our Actions and Progress

In FY22, we sought out external collaborations that would help us better understand modern slavery and our own risks. We identified and engaged with two key collaboration opportunities: an industry collective and academia. Our collaborative relationships assisted us to develop strategies to address modern slavery risks and objectively assess the effectiveness of our actions.

#### Industry



**Human Rights Resource and Energy Collaborative**

The Human Rights Resource and Energy Collaborative (**HRREC**) brings together leading companies from across the resource and energy industries to work collaboratively in identifying and addressing human rights and modern slavery issues in our sector. HRREC facilitates development and sharing of expertise between practitioners and provides a platform for engagement between industry, government, non-government organisations and other experts in modern slavery.

IGO joined HRREC in November 2021 and has been an active participant, particularly in the supplier and marine shipping sub-groups. The supplier sub-group is focused on human rights and

related due diligence activities in supply chains. The marine shipping sub-group is addressing seafarer welfare issues that have been exacerbated by global COVID-19 restrictions.

Through our HRREC participation we have contributed to the ongoing development of industry-standard approaches and guidance to modern slavery issues.

#### Academia

The University of Western Australia's McCusker Centre for Citizenship runs an annual Approaches to Wicked Problems unit. 'Wicked problems' describe complex challenges with interrelated political, cultural, social and economic dimensions for which there is rarely an easy solution.

IGO was the project sponsor for a team of students and set a challenge about how to improve support and engagement on modern slavery issues across our small and medium sized suppliers. This collaboration opportunity was especially valuable as the benefits were two-fold:

- IGO received some fantastic, well-researched and objective information and advice about our supply chains; and
- We assisted the next generation of industry professionals by building awareness of modern slavery issues and the challenges addressing these issues in a business environment.

IGO will use the students' research and proposed solutions to share insights with our industry peers and inform the development of our future supplier engagement strategies.

#### Looking Ahead

IGO continually explores a broad range of collaboration and partnership opportunities. In FY23, IGO will continue working to identify appropriate external collaboration prospects. Internally, we will consider the establishment of a cross-functional modern slavery working group to drive engagement across our business.



Left to right: Conor Patton, Maddison Wilkinson, Maraya Takoniatis, Danielle Flamiano and Cephas Issa



# Evaluating the Effectiveness of Our Actions



## 5.0 Evaluating the Effectiveness of Our Actions

IGO's modern slavery work is designed to address any adverse impacts to people resulting from our operations and supply chains. To ensure that we address adverse impacts and modern slavery risks appropriately, we must evaluate the effectiveness of our actions.

### Our Actions and Progress

IGO adopts a continuous review and improvement approach to our management of modern slavery risks and this extends to how we evaluate the effectiveness of our actions. In FY22, IGO committed to continue to build our performance monitoring and evaluation system.

In accordance with best practice guidance including the UN Guiding Principles for Business and Human Rights, IGO uses a range of quantitative and qualitative measures to assess the effectiveness of our actions to address modern slavery risks. Detail is provided in Table 3. The measures we utilise draw on feedback from both internal and external sources. We use these outputs and outcomes to verify that our corporate governance, risk assessment and due diligence, remediation, training and collaboration initiatives have been implemented and are operating successfully. We also use these measures to help us identify any areas for improvement.

IGO incorporates the feedback we receive directly from our internal stakeholders (including employees) and external stakeholders (such as our investors) into our governance and risk management processes. As noted in section 4.1, no modern slavery or human rights issues have been raised via our Speak Up platform, but it operates as a strong mechanism for us to obtain anonymous and targeted feedback about the effectiveness of our actions.

**Table 3: Quantitative and Qualitative Measures**

Key Area	Quantitative Measures (Outputs)	Qualitative Measures (Outcomes)
Corporate Governance	External benchmarking and rating of our modern slavery statements	Alignment of governance documents with best practice guidance
Risk Assessment and Due Diligence	<b>Operational Risks</b>	Improved understanding of risk profile and nature of risks
	Findings of annual employee engagement survey (%)	Quality of information obtained via due diligence and audits
	<b>Supply Chain Risks</b>	Potential or actual instances of modern slavery identified
	Number of new and existing suppliers screened (%)	Public reports or other findings of potential or actual instances of modern slavery not identified via risk assessment or due diligence processes
	Number of high-risk suppliers (%)	
	Number of SAQs issued	
Remediation	Supplier SAQ completion rate (%)	
	Number of audits completed	
	Number of grievances relating to modern slavery or human rights issues	Quality of grievance resolution responses and adherence to internal process
	Number of active and resolved Supplier Rectification Plans	Improvements achieved via Supplier Rectification Plans
Training	Number of training hours delivered	Improved level of awareness and understanding of modern slavery and associated risks
	Training completion rate for targeted employees (%)	Improved ability to manage risks
	Training completion rate for total workforce (%)	Ongoing professional development
Collaboration	Number of HRREC meetings attended and hosted	Progress towards targeted HRREC deliverables
	Number of external collaborations achieved	Business engagement with internal collaboration activities Feedback from external stakeholders

### Looking Ahead

IGO recognises that there are areas for improvement with respect to how we measure the effectiveness of our actions. We expect to implement more comprehensive systems as our maturity develops, such as establishing formal processes to review how we define our outputs and outcomes that involves seeking input from key stakeholders across our business.

As noted in section 4.1, in FY23 IGO will review the external reporting functionality of our grievance mechanism and promote it to our suppliers. We will assess the effectiveness of our grievance mechanism against the criteria in the UN Guiding Principles on Business and Human Rights, including its accessibility and the transparency of our process.

# See Beyond

In FY23, we aim to achieve the following actions in support of our commitment to continuous improvement of our modern slavery risk management.



### Corporate Governance

Finalise and publish our Supplier Code of Conduct and review the functionality of our external grievance mechanism



### Risk Assessment and Due Diligence

#### Operational Risks

Undertake a review of our commercial practices and decision-making processes

#### Supply Chain Risks

Implement a new modern slavery screening tool to provide better insights into our operational and supply chain risks



### Remediation

Review best practice guidance and begin to formulate our remediation and response framework



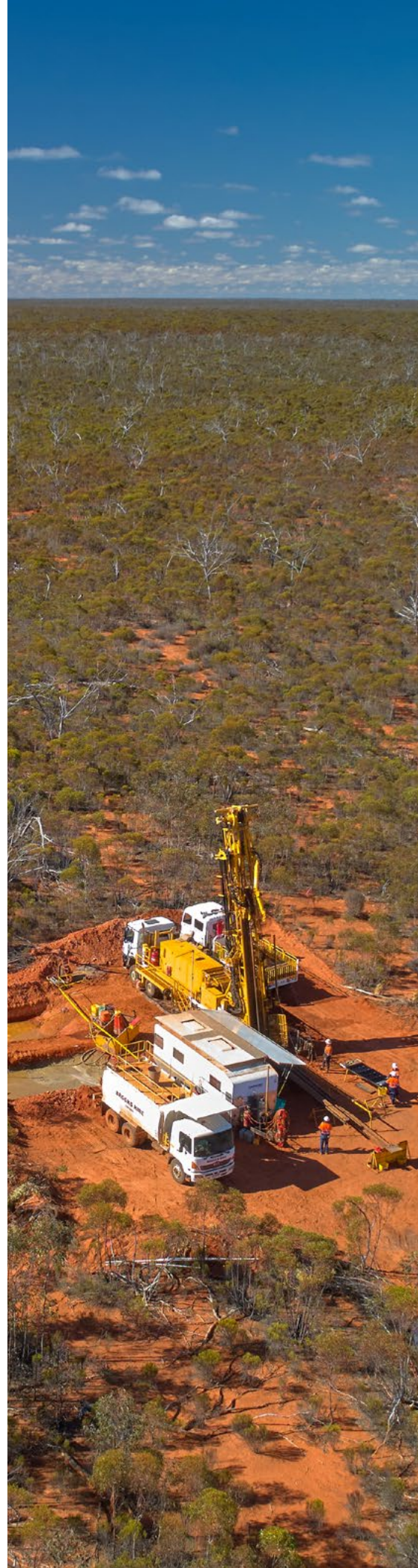
### Training

Continue to deliver targeted, risk-based training for departments within our business



### Collaboration

Pilot an internal modern slavery working group



## Section 7

# Consultation Process

IGO's Board is the governing body for IGO Limited. All IGO subsidiaries are supported by centralised shared services including our Legal, Finance, Corporate Procurement and IT teams.

All IGO Group entities are governed by the same risk management framework and governance practices. To prepare our modern slavery statement, the process of consultation involves our Board, our executives and relevant personnel and departments embedded throughout our business.

The IGO Group includes:

- IGO Limited (ACN 092 786 304)
- Flinders Prospecting Pty Ltd (ACN 146 899 863)
- IGO Newsearch Pty Ltd (ACN 142 192 701)
- IGO Stockman Parent Pty Ltd (ACN 124 695 549)
- IGO Stockman Project Pty Ltd (ACN 124 695 567)
- IGO Nickel Holdings Pty Ltd (ACN 167 644 519)
- IGO Nova Holdings Pty Ltd (ACN 009 150 083)
- IGO Nova Pty Ltd (ACN 146 091 527)
- IGO Windward Pty Ltd (ACN 158 432 270)
- IGO Lithium Holdings Pty Ltd (ACN 633 371 249)
- IGO Copper Holdings Pty Ltd (ACN 657 572 793)
- IGO Cobar Pty Ltd (ACN 657 573 398)
- Western Areas Limited (ACN 091 049 357)
- Western Areas Nickel Pty Ltd (ACN 122 522 696)
- Australian Nickel Investments Pty Ltd (ACN 111 599 323)
- BioHeap Ltd (ACN 009 225 398)
- Western Platinum NL (ACN 097 742 580)
- IGO Canada Holdings B.C. Ltd (FBN 722556701BC001)
- IGO Better Futures Pty Ltd (ACN 662 648 277)

## Section 8

# Approval

This statement was prepared in consultation with key personnel from each entity within the IGO group and approved by IGO's Board of Directors on 6 December 2022.



**Michael Nossal**

Chair

IGO Limited





**MAKING A  
DIFFERENCE**