



# Modern Slavery Statement 2022

## **1. Introduction**

Nickel Industries Limited ('Nickel Industries', 'the Company') and its controlled entities (together 'the Group') oppose modern slavery in its forms, including forced labour, bonded labour, child labour, prison labour, and trafficked labour. In addition, we expect our suppliers to prohibit modern slavery in their own supplier and subcontractor networks.

Nickel Industries recognises that slavery and human trafficking remain challenging for the global society and acknowledges its responsibility to Australia's Modern Slavery Act 2018. The Company will identify the modern slavery risks and ensure transparency within its value chain to ensure modern slavery is not happening anywhere in its operations. In line with its Sustainability Policy and Human Rights Policy, Nickel Industries will (but is not limited to):

- maintain zero tolerance for slavery and human trafficking;
- encourage its employees to report concerns, protect whistleblowers, and not tolerate retaliation of any kind toward individuals who report to the Company in good faith;
- provide appropriate supervision and management of its contract and identify concerns if they arise;
- audit and review its processes to ensure ethical behaviour in the workplace and implement steps to mitigate any gaps that may be identified;
- use standard contractual clauses with suppliers to prevent modern slavery practices; and
- endorse training on human rights and modern slavery to relevant staff.

## **2. About this Statement**

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) (the Act). Under the Act, Nickel Industries Limited is a reporting entity and is required to submit a Modern Slavery Statement for the year ended 31 December 2022. In order to prepare this statement, we engaged with the reporting entities covered by this statement and consulted the entities we own or control.

## **3. About Nickel Industries**

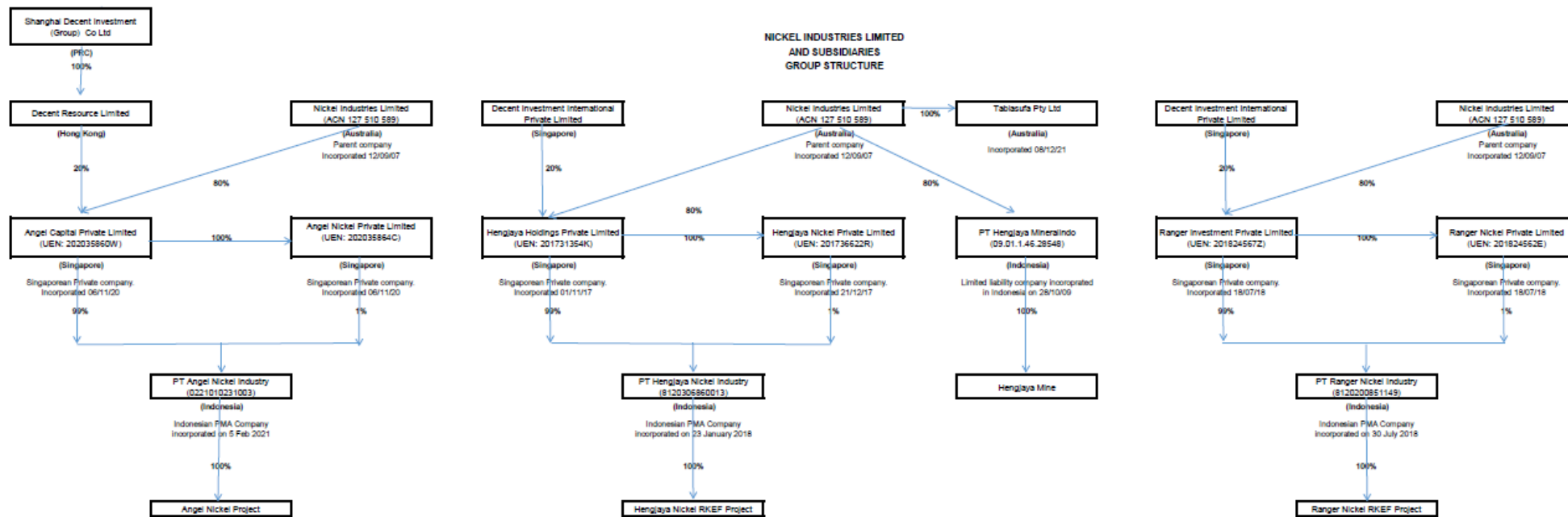
Nickel Industries (original name Nickel Mines Limited) was incorporated on 12 September 2007 under the laws of the State of New South Wales, Australia. The Group has become a globally significant, low-cost producer of nickel pig iron ('NPI'), a key ingredient in stainless steel production.

The Group's principal operations, located in Central Sulawesi, Indonesia, are the Hengjaya Nickel, Oracle Nickel and Ranger Nickel rotary kiln electric furnace ('RKEF') projects located within the Indonesia Morowali Industrial Park ('IMIP'), the Angel Nickel RKEF Project at the Indonesia Weda Bay Industrial Park ('IWIP') and the Hengjaya Mine, a large tonnage, high grade nickel laterite deposit in close proximity to the IMIP. At year end, the Company held an 80% interest in each of the Angel Nickel, Hengjaya Nickel and Ranger Nickel projects and the Hengjaya Mine and a 70% interest in the Oracle Nickel project. On 31 December 2022, the Group consists of the following entities:

<i>Parent entity</i>	<b>Ordinary shares – Group interest 31 December 2022 %</b>
<b>Nickel Industries Limited</b>	
<i>Controlled entities</i>	
PT Hengjaya Mineralindo (incorporated in Indonesia)	80
Hengjaya Holdings Private Limited (incorporated in Singapore)	80
Hengjaya Nickel Private Limited (incorporated in Singapore)	80
PT Hengjaya Nickel Industry (incorporated in Indonesia)	80
Ranger Investment Private Limited (incorporated in Singapore)	80
Ranger Nickel Private Limited (incorporated in Singapore)	80
PT Ranger Nickel Industry (incorporated in Indonesia)	80
Angel Capital Private Limited (incorporated in Singapore)	80
Angel Nickel Private Limited (incorporated in Singapore)	80
PT Angel Nickel Industry (incorporated in Indonesia)	80
Oracle Development Private Limited (incorporated in Singapore)	70
Oracle Nickel Private Limited (incorporated in Singapore)	70
PT Oracle Nickel Industry (incorporated in Indonesia)	70
Tablasufa Pty Ltd (incorporated in Australia)*	100

\* Dormant.

The chart below shows the Group structure on 31 December 2022.

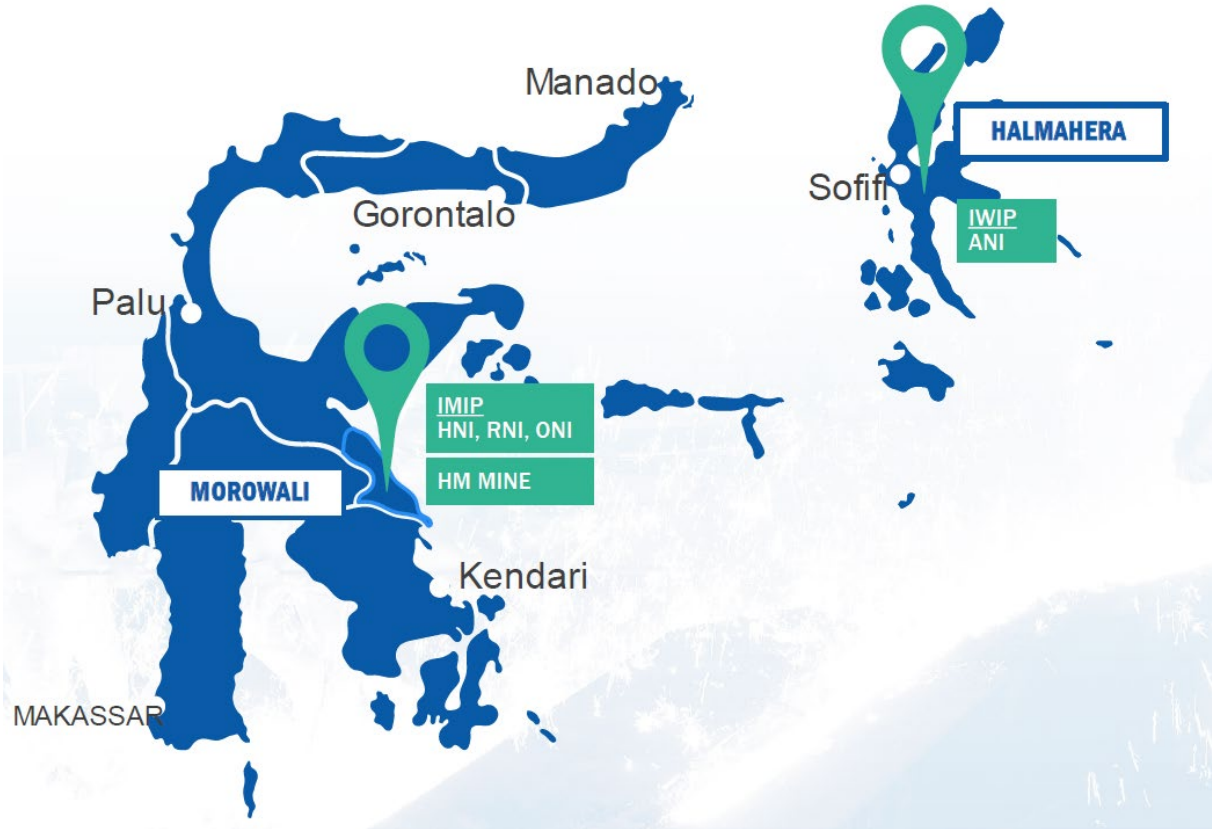


**4. About Our Operations and Supply Chain**

Throughout 2022 we held an 80% interest in the Hengjaya Nickel, Ranger Nickel, and Angel Nickel RKEF projects via our 80% interest in the paid-up share capital of Hengjaya Holdings Private Limited, Ranger Investment Private Limited, and Angel Capital Private Limited, being the respective Singaporean domiciled holding companies that wholly own PT Hengjaya Nickel Industry and PT Ranger Nickel Industry, the Indonesian PMA companies that in turn own 100% of the Hengjaya Nickel and Ranger Nickel projects.

Over the course of 2022, we also acquired a 70% interest in the Oracle Nickel RKEF project via an acquisition of 70% paid-up share capital of Oracle Capital Private Limited, the Singaporean domiciled holding Company that wholly owns PT Oracle Nickel Industry, the Indonesian PMA company that in turn owns 100% of the Oracle Nickel project.

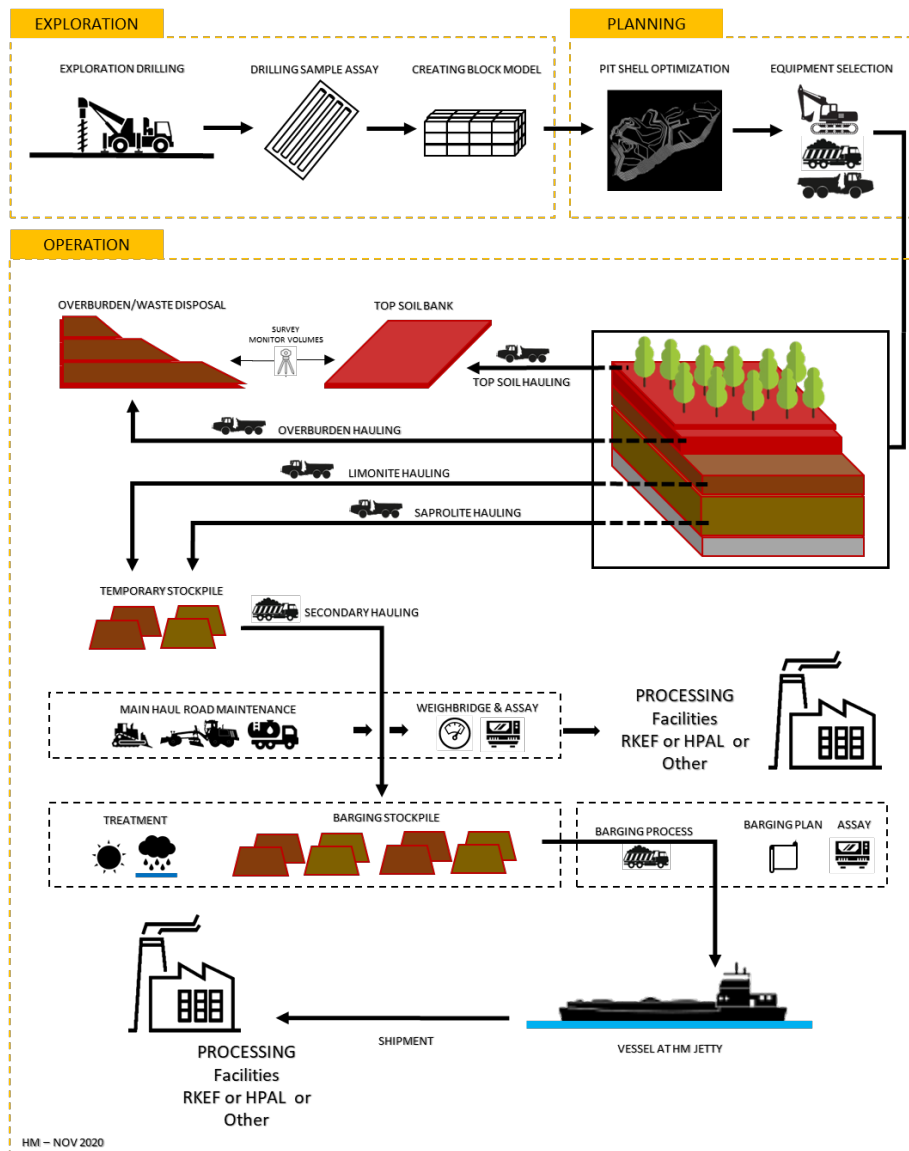
Additionally, the Company holds an 80% interest in PT Hengjaya Mineralindo, the owner of 100% of the Hengjaya mine, with the remaining 20% interest owned by the Company's Indonesian partner. The mine is located approximately 12 kilometres from the IMIP in the Morowali Regency, Central Sulawesi, Indonesia.



**a. Nickel ore mining operations**

Nickel Industries completed its acquisition of an 80% interest in the Hengjaya Mine in Central Sulawesi in March 2012, with the production of nickel ore commencing in October 2012 and the first shipment of ore sailed in February 2013. However, ore shipments and production ceased in December 2013, ahead of Indonesia's introduction of a ban on unprocessed mineral exports.

Production at the Hengjaya Mine was recommenced in 2015 following the establishment of the IMIP in close proximity to the mine. The mine continued supplying saprolite nickel ore to stainless steel and nickel pig iron producers operating at IMIP through 2019. In addition, 2019 saw the construction and successful commissioning of the Hengjaya Nickel and Ranger Nickel RKEF projects within the IMIP, projects in which Nickel Industries would also move to an 80% interest. The typical process in the Hengjaya Mine is explained in the chart below:



All saprolite nickel ore sales from the Hengjaya Mine in 2022 were to PT Hengjaya Nickel Industry and PT Ranger Nickel Industry, the operating entities of the Hengjaya Nickel and Ranger Nickel projects. Limonite ore was supplied to the Huayue Nickel-Cobalt project located within the IMIP.



**b. RKEF operations**

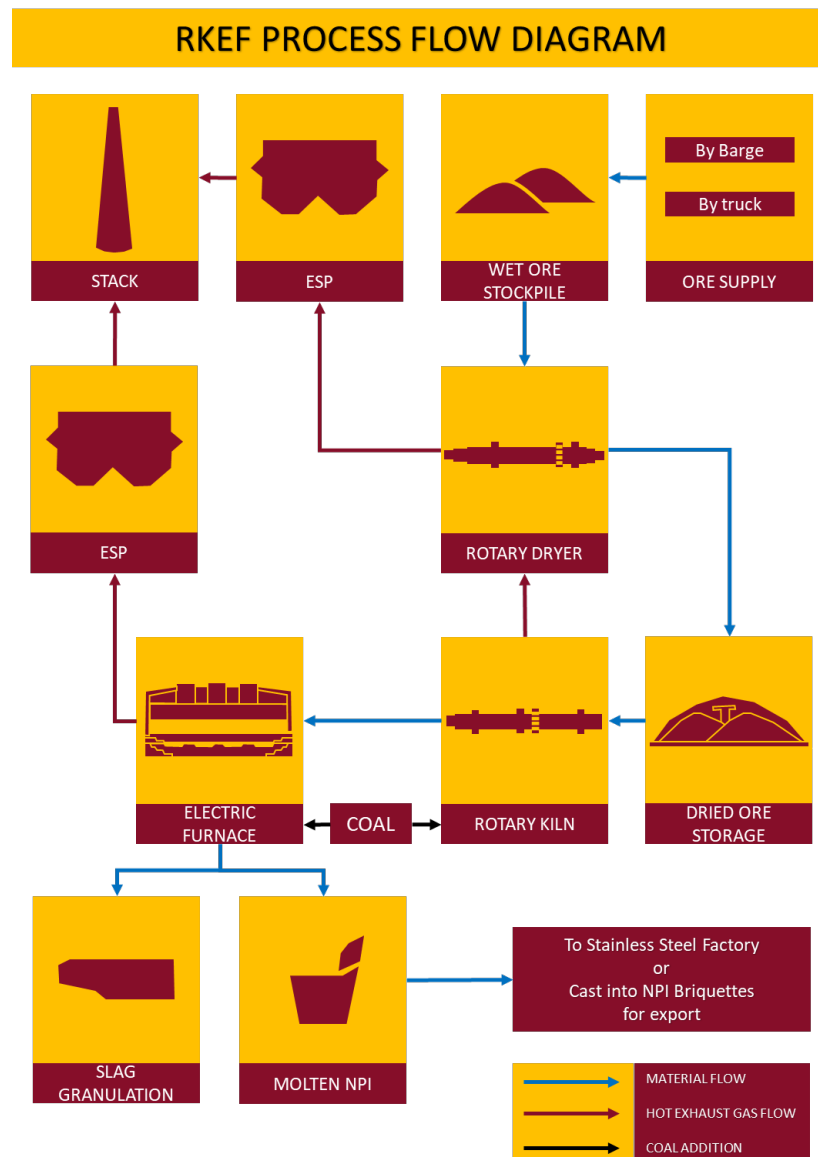
Nickel Industries' three fully operational RKEF projects in 2022 were the Hengjaya Nickel ('HNI'), Ranger Nickel ('RNI') and Angel Nickel ('ANI') RKEF projects. The first two projects completed construction and commissioning in 2019 and are located within the IMIP in Central Sulawesi, Indonesia, while the latter is located in the IWIP, North Maluku. The IMIP commenced construction in 2013, an endeavour of Tsingshan, the world's largest nickel and steel producer. Tsingshan pioneered the RKEF process to produce low-cost NPI and is now the dominant player in the Indonesian NPI industry and a global leader in NPI processing technology. The four RKEF lines of ANI underwent commissioning during 2022, with the first line commencing at the end of January 2022 and the fourth line in the middle of May 2022, which is when commercial sales commenced following receipt of the project's commercial sales licence. The 380MW power plant at ANI commissioned in August 2022;

Additionally, the Company acquired a 70% interest in the Oracle Nickel ('ONI') project that was under construction throughout 2022. ONI is a development project within the IMIP on Sulawesi Island in Indonesia's Central Sulawesi province. It is a joint collaboration with Shanghai Decent, the Company's largest shareholder, comprising:

- four 54 RKEF lines with an annual nameplate production capacity of 36,000 tonnes of nickel metal (in NPI); and
- ancillary facilities required for the operation of each of the RKEF lines.

ONI is separately undertaking the construction of a 380MW power plant that will support the Company's RKEF lines and the IMIP's overall grid power requirements.

The Company does not have formal contractual agreements for the supply of ancillary services within the IMIP and IWIP that support the RKEF operations (for example, power and access to ports). However, to facilitate the operations of HNI, RNI, ANI and now ONI within the industrial parks, Shanghai Decent have, in Collaboration Agreements (CAs) entered into with the Company, agreed that its related companies that supply such services within the area will provide such services to HNI, RNI, ANI and ONI in accordance with the 'principle of non-discrimination, substantially the same manner, with the same degree of care and at the same price without discrimination of any kind (such as priority of entry) as it does for users within the industrial parks. Our RKEF operations consist of some activities in the chart below:





## 5. Modern Slavery Risks in Nickel Industries Operations and Supply Chains

Whilst Nickel Industries is an Australian Company, the Group's operations are primarily based in Indonesia. These operations can be divided into two segments: nickel ore mining and NPI and nickel matte production at the Group's RKEF operations.

Nickel Industries recognises that slavery and human trafficking remain challenging for the global society and acknowledges its responsibility to Australia's Modern Slavery Act 2018. The Company will identify the modern slavery risks and ensure transparency within its value chain to ensure modern slavery is not happening anywhere in its operations.

Nickel Industries acknowledges that there are enhanced risks of operating in Indonesia. The country was one of more than half of the G20 countries yet to enact formal laws, policies or practices to stop businesses and governments from sourcing goods and services produced by forced labour.<sup>1</sup> The Indonesian Government's response to modern slavery was rated BB by the Global Slavery Index 2018, placing it in the percentile 50 to 59.9.<sup>2</sup>

The policies of the Hengjaya Mine, the Company's RKEF operations, the IMIP and the IWIP are to prioritise local suppliers to sustainably contribute to the livelihoods and well-being of the communities around our areas of operations. Additionally, the Company aims to implement due diligence processes by following the core components below:

- to identify human rights risks in all the Company's operations by considering all stakeholders involved, particularly rights-holders such as employees, indigenous people, local communities, human rights defenders, supply chain workers and business partners;
- to encourage human rights as a topic for every employee throughout the business;
- to prevent and mitigate human rights and modern slavery issues by taking appropriate actions and integrating findings from impact assessments across relevant Company processes. This step is taken to ensure that human rights are upheld and protected against all forms of human violation in its business operations and sourcing;
- to ensure compliance with all local laws and adopt relevant codes of practice relating to human rights; and
- to maintain meaningful stakeholder engagement in all human rights policy planning and implementation.

---

<sup>1</sup> The Global Slavery Index 2018, page 5.

<sup>2</sup> The Global Slavery Index 2018, page 45.

**6. Assessing and Mitigating Modern Slavery Risks**

Nickel Industries established the Audit and Risk Management Committee in 2018 with specific responsibilities, including reviewing whether the Company has any material exposure to any economic, environmental and social sustainability risks, such as modern slavery, and developing strategies to manage those risks by following the recommendations from our board.

Moreover, Nickel Industries commissioned JRP Advocates, an external and independent law consultant, to conduct a human rights assessment of its operations in 2022 by detailing the gaps and recommendations related to Human Rights and Modern Slavery in the Company's business operations, as well as the extent to which the Company has been implementing Human Rights values and avoiding Modern Slavery practices, as well including its risk assessment.

Based on the Company's evaluation of the provided Company policies, interviews and observations made during site visits at the Hengjaya Mine and HNI and RNI, we have determined that the Company has complied with the mandatory requirements per Human Rights and Modern Slavery laws and is therefore deemed to have upheld Human Rights values and prevented modern slavery practises in its business operations in accordance with the Australian Modern Slavery Act 2018. The Company intends to expand this evaluation process in 2023 to include ANI and ONI.

The detailed results are shown in the table below:

**1. Hengjaya Mine**

<b><u>RIGHT TO LIVE:</u></b>	
<b>Each person has the right to live, defend their life, improve their living conditions and have the right to freedom and survival.</b>	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
1. The Company shall regulate and provide decent housing, meals and beverages facilities to workers who are stationed in mining areas.	<p>In Nickel Industries' Policy, the Company has stated its commitment to have a decent working environment for its workers and the local community, but this has not been reflected in more concrete regulations on housing, meals and beverages facilities for the workers who are stationed in mining areas.</p> <p>Based on observations on the site, the Company has provided decent housing, meals and beverages facilities for workers who are stationed in the mining area.</p>

<p>2. The Company shall regulate and provide Occupational Health and Safety (OHS) equipment and/or facilities and install them in mining areas.</p>	<p>The Company Regulations have governed the availability of health and safety equipment and/or facilities, which include:</p> <ul style="list-style-type: none"> <li>a. Company provides Personal Protective Equipment (PPE) and OHS equipment.</li> <li>b. Workers are required to wear PPE and OHS equipment.</li> </ul> <p>The Company has developed SOP related to Occupational Health and Safety, which was compiled based on recommendations from Employment Agency.</p>
<p>3. The Company shall regulate and provide decent health facilities in the mining area, including medicine, ward and medical personnel.</p>	<p>The Company Regulations have governed the availability of health facilities in the mining area, which is to provide the workers with the right to utilise the clinic facility in the mining area at no charge.</p> <p>The Company has provided health facilities in the mining area.</p>
<p>4. The Company shall see to the sustainability of the environment and local communities in operating the mining business.</p>	<p>In Nickel Industries' Policy, the Company has stated its commitment to operate its business while respecting the local communities by performing certain actions, including:</p> <ul style="list-style-type: none"> <li>a. Employing the local residents as workers or suppliers in its operational activities.</li> <li>b. Being transparent in the governance, regulations and practices in carrying out its business activities to parties with interests.</li> <li>c. Develop mutually beneficial agreements with local communities regarding land, water and the environment.</li> </ul> <p>The Company has implemented a CSR program properly by compiling and implementing a master plan for Community Development and Empowerment for a 10-year period which exceeds the requirement determined by the prevailing law.</p>

<p>5. The Company shall regulate worker training in order to improve the skills, competencies and careers of the workers.</p>	<p>The Company Regulations have governed Worker Training, including:</p> <ul style="list-style-type: none"> <li>a. Providing equal opportunity to all workers to participate in mentoring, motivation, training and development programs.</li> <li>b. Bonding period of six months for workers who take part in training and self-development.</li> </ul>
<p>6. The Company shall register the workers in health insurance and employee social security programs.</p>	<p>The Company Regulations have governed the health insurance program and employment social security program, such as:</p> <ul style="list-style-type: none"> <li>a. Workers are entitled to health insurance and employee social security.</li> <li>b. The Company is obligated to register workers in health insurance and employee social security programs.</li> </ul>
<p>7. The Company shall add a clause in the agreement between the Company and the contractor that regulates the contractor's obligations to provide decent housing, meals and beverages, as well as toilet facilities to their workers who are stationed in mining areas.</p>	<p>We did not receive any agreements between the Company and the contractor.</p> <p>Although the contractor's workers are legally the responsibility of the contractor, it is important to remember that they are working in the Company's mining area. Therefore, when a Human Rights issue occurs, the Company will get involved.</p>

**RIGHT TO NOT BE TORTURED:**

**Every person has the right to be free from all forms of torture and cruel treatment or punishment that degrade human dignity.**

Requirements	Assessment Results and Mitigation Strategies
<p>1. The Company shall regulate internal issues handling, both between workers and between workers and Company.</p>	<p>The Company Regulations have governed internal issues handling, including:</p> <ul style="list-style-type: none"> <li>a. The Company is entitled to impose sanctions, either verbally/written or in a warning letter, to workers who violate the Company's rules and regulations.</li> <li>b. The Company is entitled to deduct wages if the worker is absent from work without reason.</li> <li>c. The Company is entitled to suspend workers who are currently in the Last Warning Letter period and make another mistake.</li> </ul>

<p>2. The Company shall regulate the handling of workers who are suspected of committing criminal acts.</p>	<p>The Company Regulations have governed the handling of workers who are suspected of committing criminal acts, which are:</p> <ol style="list-style-type: none"> <li>a. Giving First and Last Warning Letters if the worker is suspected of committing criminal acts, such as sexual harassment, carrying firearms/sharp weapons/explosives, intimidating the management, etc.</li> <li>b. Lay off workers who commit serious acts, such as fraud, theft, embezzlement, false statement, immoral acts, etc.</li> </ol>
<p>3. The Company shall have a land acquisition mechanism that considers the prevailing laws and regulations.</p>	<p>The Company has templates on land acquisition in accordance with the recommended draft from the Land Authority, but the Company should have a mechanism/SOP for the actual implementation based on those drafts.</p>
<p>4. The Company shall have a mechanism for conflict handling and resolution with third parties (other than land acquisition conflicts) that considers the prevailing laws and regulations.</p>	<p>In practice, the Company has implemented dispute resolution methods that respect Human Rights values.</p>

**RIGHT TO PERSONAL FREEDOM, THOUGHT AND CONSCIENCE:**  
**Every person has the right to personal freedom, to embrace a religion that they have faith in, to choose their political aspirations, and to express and disseminate opinions according to their conscience.**

<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
<p>1. The Company shall have a channel to collect aspirations and complaints from the workers.</p>	<p>The Company Regulations have governed channels to collect workers' aspirations and complaints, such as:</p> <ol style="list-style-type: none"> <li>a. Workers are entitled to give ideas and constructive feedback to build and advance the Company.</li> <li>b. Any worker complaints can be discussed with superiors verbally or written via HR and/local Manpower Office.</li> </ol> <p>In practice, the HR Department and direct supervisor of each worker have become a channel to collect aspirations and complaints from the workers.</p>

2. The Company shall have rules on worker resignation.	The Company Regulations have governed worker resignations, which is by submitting a letter of resignation at least 30 (thirty) days before the resignation date, and Workers are entitled to Severance Pay and Entitlement Pay.
3. The Company shall provide Workers with the opportunity to participate in the election of political figures at the village, district/city, provincial and national levels without interfering with the Company's operational activities.	In practice, the Company allows the employee to participate in the election of political figures at the village, district/city, provincial and national levels without interfering with the Company's operational activities.
4. In the Company Regulations or in the Company internal policy, it is recommended to add rules/affirmations regarding the freedom for Workers to embrace their respective religion and/or belief, as long as they do not conflict with prevailing laws and regulations.	The recommendation is being considered.
<p><b><u>RIGHT TO RELIGIOUS BELIEF:</u></b>  <b>Every person is free to embrace their religion and belief, free to worship according to their religion and belief and have access to worship facilities.</b></p>	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
1. The Company shall provide the Workers with the opportunity to worship according to their religion and belief as long as it does not interfere with Company's operational activities.	In practice, the Company has provided opportunities for the workers to conduct worship according to their religion and belief.
2. The Company shall provide a place of worship in the mining area.	The Company has provided a mosque for Muslim workers, and for the non-Muslem/Christians, the Company has provided opportunities to go out of the mining area once a week for worship.
3. The Company shall provide the Workers with the right to worship and religious holiday allowance according to their own religion.	The Company Regulations Article 34 and Article 36 have governed the granting of leave for Workers who perform the Hajj pilgrimage and provide religious holiday allowance and child circumcision or baptism.

**RIGHT TO NOT BE ENSLAVED:**

**Every person has the freedom to voluntarily perform a job they desire and to refuse a job they do not desire.**

<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
1. The Company shall explain and disseminate information on the rights and obligations of the Company and Workers in the Employment Agreement, Company Regulations and other regulations owned by the Company.	The Company Regulations have governed the rights and obligations of the Company and Workers, which are: a. To guarantee and confirm the rights and obligations of the Company and Worker. b. Company to provide Company Regulations to all Workers to be known and implemented properly.  The Company has socialised and distributed the Company Regulations to the workers in the form of a booklet.
2. The Company shall provide wages to Workers according to the Regional Minimum Wage (UMR) at the minimum.	In the Nickel Industries' Remuneration Committee Charter, the Company has a remuneration committee tasked with determining and reviewing workers' wage adjustments according to their roles, abilities and performance.  The Company has provided wages to Workers at least in accordance with the provisions of the Regional Minimum Wage.
3. The Employment Agreement shall clearly govern the job description and responsibilities of the Workers.	The Employment Agreement has clearly governed the job description and responsibilities of the Workers.
4. The Company shall apply the wage rules for sick workers in accordance with the prevailing laws and regulations.	The Company Regulation <b>Article 32</b> has governed wages for sick workers, which are: a. Sick Workers are required to submit a medical certificate no later than 2 (two) days after the worker returns to work. b. Failure to provide a medical certificate will result in a deduction of leave entitlement. If the worker does not have any more leaves, then the wage will be deducted. c.

<p>5. The Company shall govern and implement working days, holidays, working hours, break time, additional working days/additional work responsibilities in accordance with prevailing laws and regulations.</p>	<p>The Company Regulations have governed working days, holidays, working hours, break time, additional working days/additional work responsibilities, which are:</p> <ol style="list-style-type: none"> <li>a. The Company has the authority to assign Workers to make official trips to certain areas based on an Official Travel Order/Assignment Letter. If there is no letter, then the trip will be deemed to be invalid and is a violation and is subject to sanctions.</li> <li>b. Head Office Workers who go on business trips on Saturdays and Sundays will have their meals replaced with a day off.</li> <li>c. Implement working days, holidays, working hours, break time and overtime.</li> </ol>
<p>6. The Company shall govern the schedule of holidays for Workers and give Workers the right to enter and exit the mining area during holidays.</p>	<p>Company Regulations have governed the holidays and national holidays.</p> <p>In practice, the Company has implemented the six working weeks work and two weeks off mechanism or ten working weeks and two weeks off, with a day off in between working weeks.</p>
<p>7. The Company shall have regulations on and provide annual leaves and additional leaves other than annual leaves when Workers marry, marry off their children, circumcise their children, baptise their children, the wife gives birth or miscarriages, spouse/parent/parent-in-law/child/child-in-law and/or family members living in the same household passed away.</p>	<p>The Company Regulations have governed leave rights, including:</p> <ol style="list-style-type: none"> <li>a. Annual leave, periodic leave and special leave.</li> <li>b. Maternity leave and miscarriage leave.</li> <li>c. Hajj pilgrimage leaves.</li> </ol>
<p><b><u>RIGHT TO BE ACKNOWLEDGED AND EQUALITY BEFORE THE LAW:</u></b>  <b>Every person has the right to receive the opportunity, recognition, justice, legal certainty, and equality before the law.</b></p>	
<p><b>Requirements</b></p>	<p><b>Assessment Results and Mitigation Strategies</b></p>
<p>1. The Company shall govern the recruitment and provide opportunities for everyone to be accepted as Workers and occupy a position in the Company,</p>	<p>In Nickel Industries' Diversity Policy, it has been emphasised that diversity does not only include gender but also age, religion, ethnicity, language, marital status, socio-cultural and disability, and it recognises that diversity contributes to the</p>



<p>irrespective of gender, ethnicity, race and religion.</p>	<p>success of the Company and benefits each individual stakeholder and shareholder. Additionally, this rule also emphasises the equal opportunity to all Workers based on ability and performance.</p> <p>The Company Regulations have governed the recruitment of Workers and provide an opportunity for everyone to be accepted as a worker and occupy a position in the Company irrespective of gender, ethnicity, race and religion.</p>
<p>2. The Company must respect differences and give equal rights and obligations to all Workers irrespective of gender, ethnicity, race and religion while still considering each role/position and Employment Agreement.</p>	<p>In the Nickel Industries Code of Conduct on Employment Practices, the Company intends to provide a working environment where all personnel can excel irrespective of race, religion, age, disability, gender, sexual orientation and marital status. The Company will maintain regulations regarding the work environment and diversity. All personnel must understand and ensure compliance with said regulations.</p> <p>The Company Regulations have governed/respected differences and provided equal rights and obligations to all Workers without discrimination:</p> <ol style="list-style-type: none"> <li>a. Implement and place all rights and obligations according to their portion.</li> <li>b. Give equal treatment, and respect and appreciate diversity in all Workers.</li> </ol>
<p>3. The Company shall govern the acceptance and treatment of prospective Workers/Workers with physical limitations/disabilities.</p>	<p>Although the Company does not employ people with disability, the Company should have a mechanism/SOP regarding the treatment of workers with disabilities. This exhibits the implementation of equality before the law.</p>
<p>4. The Company shall have regulation/SOP on the collection, usage, storage and processing of workers' personal data in order to maintain its confidentiality.</p>	<p>In Point 5 of Nickel Industries Code of Conduct, it is stipulated that every personnel is prohibited from using all information obtained from work for personal gains or the benefit of other parties or, on the contrary, with someone's privacy.</p>

5. The Company is obligated to provide legal protection to Workers for all legal consequences arising from the Company's operational activities with consideration of prevailing laws and regulations.	The Company Regulations have governed that the Company provides protection to Workers for all legal consequences arising due to Company's interest as long as it is carried out by the worker in accordance with the applicable system and procedures in the Company.
6. The Company is required to have a mechanism for termination of employment.	The Company Regulations have governed the termination of employment with various circumstances and causes, including death, retirement, resignation and so on.
<b><u>RIGHT TO NOT BE PROSECUTED BASED ON RETROACTIVE LAW:</u></b> Every person can only be prosecuted based on the prevailing law at the time of the occurrence of the offence.	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
The Company can only sue/take action/punish Workers based on prevailing laws.	A retroactive law is not implemented in the Company.

## 2. Hengjaya Nickel and Ranger Nickel ('the Companies')

<b><u>RIGHT TO LIVE:</u></b> Each person has the right to live, defend their life, improve their living conditions and have the right to freedom and survival.	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
1. The Company shall regulate and provide decent housing, meals and beverages facilities to workers who are stationed in mining areas.	In Nickel Industries Policy, the Company has stated its commitment to have a decent working environment for its workers and the local community, but this has not been reflected in more concrete regulations on housing, meals and beverages facilities for the workers who are stationed in the industrial park.
2. The Company shall regulate and provide Occupational Health and Safety (OHS) equipment and/or facilities and install them in mining areas.	IMIP has developed SOP related to Occupational Health and Safety, which was compiled based on recommendations from Employment Agency.

<p>3. The Company shall regulate and provide decent health facilities in the mining area, including medicine, ward and medical personnel.</p>	<p>IMIP has provided proper health facilities in the area.</p>
<p>4. The Company shall see to the sustainability of the environment and local communities in operating the mining business.</p>	<p>In Nickel Industries Policy, the Company has stated its commitment to operate its business while respecting the local communities by performing certain actions, including:</p> <ul style="list-style-type: none"> <li>a. Employing the local residents as workers or suppliers in its operational activities.</li> <li>b. Being transparent in the governance, regulations and practices in carrying out its business activities to parties with interests.</li> <li>c. Develop mutually beneficial agreements with local communities regarding land, water and the environment.</li> </ul> <p>IMIP has implemented a CSR program properly in the local communities in accordance with the prevailing law.</p>
<p>5. The Company shall regulate worker training in order to improve the skills, competencies and careers of the workers.</p>	<p>The training is provided as listed on the following pages.</p>
<p>6. The Company shall register the workers in health insurance and employee social security programs.</p>	<p>Based on the interview with IMIP representatives, the workers are entitled to health insurance and employee social security.</p> <p>The Company has registered its workers in health insurance and employee social security programs.</p>
<p>7. The Company shall add a clause in the agreement between the Company and the contractor that regulates the contractor's obligations to provide decent housing, meals and beverages, as well as toilet facilities to their workers who are stationed in mining areas.</p>	<p>Although the contractor's workers are legally the responsibility of the contractor, they are working in the Company's area. Therefore, when any Human Rights issue occurs, the Companies will get involved.</p>

<b><u>RIGHT TO NOT BE TORTURED:</u></b>	
<b>Every person has the right to be free from all forms of torture and cruel treatment or punishment that degrade human dignity.</b>	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
1. The Company shall regulate internal issues handling, both between workers and between workers and Company.	IMIP has implemented dispute settlement in accordance with the prevailing law. In the event of a dispute, IMIP will assist the Companies in solving the issue.
2. The Company shall regulate the handling of workers who are suspected of committing criminal acts.	IMIP has implemented dispute settlement in accordance with the prevailing law. In the event of a dispute, IMIP will assist the Companies in solving the issue.
3. The Company shall have a land acquisition mechanism that considers the prevailing laws and regulations.	Not applicable since the factories are located in an industrial area.
4. The Company shall have a mechanism for conflict handling and resolution with third parties (other than land acquisition conflicts) that considers the prevailing laws and regulations.	In practice, the IMIP has implemented dispute-resolution methods that respect Human Rights values.
<b><u>RIGHT TO PERSONAL FREEDOM, THOUGHT AND CONSCIENCE:</u></b>	
<b>Every person has the right to personal freedom, to embrace a religion that they have faith in, to choose their political aspirations, and to express and disseminate opinions according to their conscience.</b>	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
1. The Company shall have a channel to collect aspirations and complaints from the workers.	In practice, the work unit of each worker becomes a channel to collect aspirations and complaints from the workers. The work unit will report to HR, which will then be escalated to the IMIP.
2. The Company shall have rules on worker resignation.	In practice, IMIP has implemented procedures in accordance with the prevailing law.

3. The Company shall provide Workers with the opportunity to participate in the election of political figures at the village, district/city, provincial and national levels without interfering with the Company's operational activities.	In practice, the Company provide the opportunity for the workers to participate in the election of political figures at the village, district/city, provincial and national levels without interfering with the Company's operational activities.
4. In the Company Regulations or in the Company internal policy, it is recommended to add rules/affirmations regarding the freedom for Workers to embrace their respective religion and/or belief, as long as they do not conflict with prevailing laws and regulations.	In practice, the Company provides freedom for Workers to embrace their respective religions and/or belief as long as they do not conflict with prevailing laws and regulations.
<p><b><u>RIGHT TO RELIGIOUS BELIEF:</u></b>  <b>Every person is free to embrace their religion and belief, free to worship according to their religion and belief and have access to worship facilities.</b></p>	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
1. The Company shall provide the Workers with the opportunity to worship according to their religion and belief, as long as it does not interfere with Company's operational activities. 2.	In practice, IMIP has provided the opportunity for the workers to conduct worship according to their religion and belief.
3. The Company shall provide a place of worship in the mining area.	IMIP has provided a Mosque for Muslim workers as the majority of Workers.
4. The Company shall provide the Workers with the right to worship and religious holiday allowance according to their own religion.	IMIP implements the granting of leave for Workers who perform the Hajj pilgrimage and provides religious holiday allowance and child circumcision or baptism.
<p><b><u>RIGHT TO NOT BE ENSLAVED:</u></b>  <b>Every person has the freedom to voluntarily perform a job they desire and to refuse a job they do not desire.</b></p>	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
1. The Company shall explain and disseminate information on the rights and obligations of the Company and Workers in the Employment Agreement, Company Regulations and other regulations owned by the Company.	<p>All Company Regulations and Employment Contract in the IMIP area is of the same template and in accordance with the prevailing Employment Law.</p> <p>Special conditions other than those regulated in the Company Regulations and Employment</p>

	Contract will be informed by IMIP's Board of Directors directly.
2. The Company shall provide wages to Workers according to the Regional Minimum Wage (UMR) at the minimum.	The Companies have provided wages to Workers at least in accordance with the provisions of the Regional Minimum Wage.
3. The Employment Agreement shall clearly govern the job description and responsibilities of the Workers.	In the Nickel Industries' Remuneration Committee Charter, the Company has a remuneration committee tasked with determining and reviewing workers' wage adjustments according to their roles, abilities and performance.
4. The Company shall apply the wage rules for sick workers in accordance with the prevailing laws and regulations.	The Employment Agreement standard applied in the IMIP area is in compliance with the prevailing law.
5. The Company shall govern and implement working days, holidays, working hours, break time, additional working days/additional work responsibilities in accordance with prevailing laws and regulations.	This has been implemented in accordance with Employment Law.
6. The Company shall govern the schedule of holidays for Workers and give Workers the right to enter and exit the mining area during holidays.	This has been implemented in accordance with Employment Law.
7.	
8. The Company shall have regulations on and provide annual leaves and additional leaves other than annual leaves when Workers marry, marry off their children, circumcise their children, baptise their children, the wife gives birth or miscarriages, spouse/parent/parent-in-law/child/child-in-law and/or family members living in the same household passed away.	In practice, IMIP has implemented holiday schedules in accordance with the Employment Law.

**RIGHT TO BE ACKNOWLEDGED AND EQUALITY BEFORE THE LAW:**

**Every person has the right to receive the opportunity, recognition, justice, legal certainty, and equality before the law.**

Requirements	Assessment Results and Mitigation Strategies
1. The Company shall govern the recruitment and provide opportunities for everyone to be accepted as Workers and occupy a position in the Company, irrespective of gender, ethnicity, race and religion.	In Nickel Industries' Diversity Policy, it has been emphasised that diversity does not only include gender but also age, religion, ethnicity, language, marital status, socio-cultural and disability and recognises that diversity contributes to the success of the Companies and benefits each individual stakeholder and shareholder. Additionally, this rule also emphasises the equal opportunity to all Workers based on ability and performance.
2. The Company must respect differences and give equal rights and obligations to all Workers irrespective of gender, ethnicity, race and religion while still considering each role/position and Employment Agreement.	In the Nickel Industries' Code of Conduct on Employment Practices, the Company intends to provide a working environment where all personnel can excel irrespective of race, religion, age, disability, gender, sexual orientation and marital status. The Company will maintain regulations regarding the work environment and diversity. All personnel must understand and ensure compliance with said regulations.
3. The Company shall govern the acceptance and treatment of prospective Workers/Workers with physical limitations/disabilities.	IMIP has employed people with disability for low-risk work, such as taking care of the Mosque.
4. The Company shall have regulation/SOP on the collection, usage, storage and processing of workers' personal data in order to maintain its confidentiality.	Point 5 of Nickel Industries' Code of Conduct stipulates that every personnel is prohibited from using all information obtained from work for personal gains or the benefit of other parties or, on the contrary, with someone's privacy.
5. The Company is obligated to provide legal protection to Workers for all legal consequences arising from the Company's operational activities with consideration of prevailing laws and regulations.	IMIP has legal representatives available for all companies and workers in IMIP Area.
6. The Company is required to have a mechanism for termination of employment.	In practice, IMIP has implemented a mechanism in accordance with the prevailing law.
<b><u>RIGHT TO NOT BE PROSECUTED BASED ON RETROACTIVE LAW:</u></b>	

<b>Every person can only be prosecuted based on the prevailing law at the time of the occurrence of the offence.</b>	
<b>Requirements</b>	<b>Assessment Results and Mitigation Strategies</b>
The Company can only sue/take action/punish Workers based on prevailing laws.	A retroactive law is not implemented in the Company.



Nonetheless, to further demonstrate compliance with human rights and prevention of modern slavery practises to external parties and/or regulators, the Company will develop additional policies and/or internal regulations to demonstrate that it upholds human rights and prevents modern slavery. To ensure the proper implementation of these standards, the Company will implement the following actions:

- a. Identify human rights risks in Nickel Industries' operations and value chain actors  
The Company commits to ensuring that the implementation of this policy is continuous and consistent. We take steps in assessments and evaluations to improve mechanisms and ensure the full implementation of this policy. The following steps can be done but are not limited to the following:
  - assessing the risks that might happen in Nickel Industries' current practices based on the relevant laws and regulations. It must cover all issues found in the mining industry, such as land acquisition conflict with local people, mining workers' exploitation, hazard in the workplace, harassment, etc.;
  - integrating human rights risk assessment into all environment and social assessment processes; and
  - performing regular audits to ensure that human rights violence is not taking place.
- b. Maintain the rights of indigenous peoples and other local communities.  
We commit to ensuring that the implementation of this policy covers the rights of indigenous people around the mining area, particularly the criteria mentioned in this policy.
- c. Support and empower women, youth and vulnerable groups in the Company. At a minimum, the following steps would be conducted by the Company:
  - evaluate all of the Company's employment processes considering the participation of women, youth and other vulnerable groups;
  - monitor all grievances submitted by all employees, then conduct root cause analysis to find the closure mitigation plan. This is particularly related to equality, sexual harassment and other human rights violence practices; and
  - create a Corporate Social Responsibility ('CSR') plan that involves vulnerable groups in the local communities.

Some of our initiatives in 2022 were:

**a. Governance**

Nickel Industries is committed to conducting its business activities and governing the Company by best corporate governance practices to the appropriate extent to the size and nature of the Company's operations. As a publicly-listed company, the Company complies with the recommendations set out in the Corporate Governance Principles and Recommendations of the ASX Corporate Governance Council. The Company always tries to be transparent in its business activities' governance, regulations and practices and to prevent any forms of modern slavery in its operations.

In 2022, the Company governed the risks of modern slavery in our operations by implementing some approaches below:

- emphasised the importance of maintaining our relations with local communities and promoting corporate social responsibility programs for the surrounding villages;
- complied with laws and regulations in our operational areas and established good relations with the Government, employees, local communities, shareholders and all stakeholders; and
- committed to improving the quality of products to meet local and international trade standards and formulated a corporate management system in line with the Company's long-term vision.

**b. Working conditions**

Nickel Industries regards employees as the Company's most important assets and devotes itself to stimulating employees' positive energy and growth by providing them with a broad career platform, good corporate culture, equal employment opportunities and competitive compensation packages to retain and attract the best talents in the market. By the end of 2022, 4,411 employees worked for the Company's operations in Indonesia.

The Company strictly complies with Indonesian labour laws, establishes a standardised employment system, and prohibits illegal workers' employment (including child labour). Also, we continued to improve and optimise our human resources management system to protect the rights of employees and preserve their health and safety at the workplace. Furthermore, we opposed forced labour and discrimination in the workplace by providing contracts for our employees following relevant regulations.

The Company is strongly committed to diversity and recognises the value of attracting and retaining personnel with different backgrounds, knowledge, and expertise. We are focused on fostering an inclusive culture and creating a more diverse, inclusive team at every level. We aim to set the tone at the top through a diverse board and executive team. The Company recognises that diversity not only encompasses gender but extends to age, ethnicity, cultural background, language, marital or family status, and disability.

In accordance with the Company's policy, we provide legal and health protection to our employees, fair remuneration based on employees' performance, paid leave, overtime payments and other related rights for the employees under the standards in Indonesia. Also, we granted permission for the employees to participate in the election of political figures at the village, district/city, provincial and national levels without interfering with the Company's operational activities. Moreover, the Company ensured the workers had the right to conduct worship according to their religion and belief in line with the local regulations.

Lastly, all employees are registered with national health and labour insurance as required by Indonesia's national policy.

### c. Training and development

In the last three years, our staff at HNI and RNI and in 2022 at ANI have undertaken relevant training and workshops, such as first-aid simulation, firefighter skills, the safety of handling chemical substances, and many others, to ensure that our personnel have sufficient knowledge and skills to run our operations safely. In addition, our personnel have attended some training as listed in the table below:

#### OHS Training and Education – Hengjaya Mine

OHS Training for Employees						
Type of Training	2022		2021		2020	
	Total Participants	Total Training Hours	Total Participants	Total Training Hours	Total Participants	Total Training Hours
Working at Height	0	0	0	0	5 Contractor	4 Hours
Near Miss Report	40 HM	80 Hours	27 HM 9 Contractor	2 Hours	12 HM	2 Hours
HIRADC	4 Contractor	8 Hours	4 Contractor	4 Hours	0	0
Incident Investigation (ICAM Method)	0	0	0	0	0	0
ERT Training (Basic Life Support)	15 HM	60 Hours	28 HM 1 Contractor	4 Hours	15 HM 3 Contractor	4 Hours
ERT Training (Fire Fighting)	24 HM 35 Contractor	118 Hours	0	0	62 HM 12 Contractor	4 Hours
ERT Training (Kendrick Extrication Devices)	0	0	8 HM	4 Hours	0	0
ERT Training (Emergency Reporting)	9 HM 5 HM	118 Hours	0	0	0	0
Confined Spaces	0	0	0	0	0	0
Lock Out Tag Out (LOTO)	37 Contractor	74 Hours	0	0	0	0

#### OHS Training and Education – Hengjaya Nickel

Employee Occupational Health and Safety Training						
Training Type	2022		2021		2020	
	Total Number of Participants	Total Training Hours	Total Number of Participants	Total Training Hours	Total Number of Participants	Total Training Hours
Working at Heights	24	1	16	1	0	0
Occupational Health and Safety Certification	47	1	35	1	0	0
5S Management Training	142	1	61	1	48	1
Safety Management Basic Knowledge Training	148	1	76	1	0	0
Safe Operating Procedures	97	1	30	1	44	1
Environmental Management Knowledge Training	93	1	33	1	0	0
Special Operations Personnel Management Training	50	1	38	1	0	0
Fire Safety Training	196	1	34	1	8	1
Accident Case	105	1	39	1	0	0
Security Management	38	1	26	1	14	1

OHS Training and Education – Ranger Nickel

Employee Occupational Health and Safety Training						
Training Type	2022		2021		2020	
	Total Number of Participants	Total Training Hours	Total Number of Participants	Total Training Hours	Total Number of Participants	Total Training Hours
Working at heights	16	1	10	1	0	0
Occupational Health and Safety Certification	31	1	23	1	0	0
5S management training	94	1	41	1	32	1
Safety management basic knowledge training	98	1	51	1	0	0
Safe Operating Procedures	64	1	20	1	29	1
Environmental management knowledge training	62	1	23	1	0	0
Special Operations Personnel Management Training	50	1	25	1	0	0
Fire Safety Training	130	1	24	1	6	1
Accident case	70	1	20	1	0	0
Security Management	25	1	17	1	10	1

OHS Training and Education – Angel Nickel

OHS Training for Employees		
Type of Training	2022	
	Total Participants	Total Training Hours
Working at Height	448	448
Lifting & rigging	7	14
Defensive Driving	254	254
Safety Rigging & Lifting	80	120
Safety Training on the Third Level	58	58
Safe Working Heavy equipment	7	14
Field Introduction Safety	197	394
Hand Injury Risk	185	185
Safety Walking in the working area	152	76
HSE Management Responsibility	166	166
Ferronickel Production Process Safety	1,040	1,560
JCC <Job Cycle Check>	130	195
PPE Requirement on site	186	93
Single Crane	42	84

Employee Occupational Health and Safety Training		
Training Type	2022	
	Total Number of Participants	Total Training Hours
Double and Mutual Insurance Joint Insurance Management System	31	1
Employee Safety Behavior Standard Double Mutual Insurance System	301	1
Reporting and Registration Management System for Driving Up and Down	13	1
Chain Labor System	37	1
Employee Code of Conduct	44	1
5S Management Training	41	1
The Management System of the Person in Charge of Safety Production	45	1
Basic Knowledge Training of Environmental Protection	48	1
High Voltage and High-Temperature Work Training	47	1
Discipline Training	36	1
Departmental Accident Case Training	32	1
Firefighter Safety Knowledge Training	40	1
Lockout and Outage Regulations Training	43	1
Order and Security	56	1

To meet the development needs of Nickel Industries, the Company constructed a management team with a proportionate ratio of Australian, Indonesian and other international nationalities. In addition, we also prepared career development and trained the local staff to carry out their responsibilities at the Company. Our training plan enables our team to meet the requirements of the management position of the Company; thus, we also contribute to the human capital development of people in our operational areas. In total, the training hours for our personnel at Hengjaya Mine have been increased from 1,288 hours in 2021 to 3,440 hours in 2022.

**d. Benefits and facilities**

We provided competitive compensation for our staff, above the regional standards in our operational areas, and increased their packages in line with the Company's employees' performance and growth. As a result, there is no difference in the basic salary and remuneration women and men earn. Also, we did our best to prevent the transmission of COVID-19 in our sites by implementing a strict health protocol, distributing epidemic prevention materials to employees, and disinfecting the canteen, office, production area and other places to minimise the risk of virus transmission. Some additional health services and facilities provided by the Company to employees are:

- provision of first aid station facilities according to standards;
- health clinics;
- medical checkup for all employees;
- COVID-19 vaccination;
- vitamins; and
- annual health risk assessments by the Company's doctor.

Additionally, through our collaboration at IMIP, we provide an emergency hospital where ill employees or work-related accidents can be picked up and transported to the clinic via an ambulance to receive medical treatment. This facility is open 24 hours and provides outpatient polyclinic, inpatient, and emergency unit services for the staff.

The Company has provided decent housing, food and beverages for workers stationed in the mining area. Also, meals were given during working hours for the staff at HNI/RNI along with other facilities such as supermarkets, barber shops, sewing rooms, reading rooms and gymnasiums to maintain their mental health. In addition, the living area is equipped with a basketball court (including an indoor basketball hall), a football field, a badminton court, and an entertainment and leisure area. At the same time, we also improved the quality of local roads and infrastructures to contribute to the local society.

To facilitate the routine prayer of Muslim staff, prayer rooms and mosques are located near the workplace. The prayer room was equipped with a sink, sound system, bookshelf, air conditioning, sermon podium, shoe, and a hat shelf. Furthermore, every department cleans the prayer rooms daily to ensure employees a comfortable prayer environment. In addition, monthly health inspections were conducted by staff to maintain the hygiene and cleanliness of these prayer rooms. Lastly, buses are also available for staff transportation.

**e. Occupational health and safety**

Nickel Industries regards health and safety as a top priority; it is paramount in our industry. We are committed to upholding rigorous health and safety standards, keeping our workplaces injury- and illness-free, and actively promoting a zero-accident work culture in every aspect of our operations. Our objective is to achieve 'Zero-Harm' for our employees, contractors, and the communities in which we operate.

Our commitment to a safe work environment is reflected in our Occupational Health and Safety (OHS) policies designed to protect our employees, contractors, suppliers, and other workers. Effective implementation of OHS policies demonstrates our commitment as a global company. Consistent OHS performance in the Company is achieved by cultivating employee habits that prioritise OHS; when good habits are practised repeatedly and continuously, they become ingrained in our behaviour and culture.

The Company's approach to preventing and mitigating the negative impact of OHS is to educate employees about OHS standards to protect their health, increase work efficiency, and avoid workplace accidents and diseases. The benefits include the ability to anticipate the presence of hazard-causing factors and take preventive measures in advance, comprehend the various types of hazards present in the workplace, assess the level of hazards present, and control the occurrence of risks.

The Company has implemented an Occupational Health and Safety Management System by adhering to applicable OHS laws and regulations, implementing risk management procedures, and adhering to OHS standards.

We maintain a compliant OHS management system for all employees, contractors, visitors, and other stakeholders. Our OHS management system is based on the following principles: policy, planning, organisation and personnel, implementation, evaluation and follow-up, documentation, and management review. The implementation of the OHS management system aims to ensure the safety and health of all employees and contractor/supplier workers in our operations. Our OHS policies cover the following aspects:

- i. conducting hazard identification and risk assessment for all Company activities and determining risk controls to reduce risk to the accepted levels;
- ii. determining OHS targets objectives and regularly evaluating their achievement;
- iii. developing and implementing OHS programmes by involving all employees to prevent incidents, including occupational illness;
- iv. developing safe work procedures, providing appropriate personal protective equipment and safety equipment, and facilitating training and capacity development for our employees in every aspect of OHS;
- v. reporting unsafe events and conditions and 'stopping the job' until corrective actions have been made;
- vi. enforcing continuous improvement by evaluating OHS management system performance through internal and external audits and follow-up of any non-conformances; and
- vii. implementing the emergency response and preparedness procedures, providing resources and regular testing to ensure their effectiveness.

Nickel Industries provided OHS training to both employees and contractors throughout 2022. Due to the COVID-19 pandemic, some activity was conducted online, while face-to-face workshops were held with strict health protocols. One of the sessions we ran last year was basic life support training. This workshop equips participants with the knowledge and skills necessary to maintain life when facing life-threatening situations. This course focuses on performing CPR (Cardiac Pulmonary Resuscitation) and is designed to educate individuals who encounter cases/incidents of cardiac arrest or respiratory arrest on the job or in the surrounding region. In addition, this CPR serves as a reminder to all employees of the critical nature of OHS.

Furthermore, we invested scientifically and effectively in enhancing the working environment, purchasing labour protection supplies, adding new safety monitoring systems, maintaining and upgrading firefighting facilities and equipment, and rectifying hidden dangers of significant accidents.

In June 2022, Nickel Industries was very pleased to receive notification that the Occupational Health & Safety Management Systems had been assessed and found to meet the requirements of ISO 45001:2018.



**f. Supplier management**

In order to protect the rights and interests of suppliers and to prevent modern slavery in our value chain, our purchasing team continuously optimises the workflow, explores new methods, seeks new ideas, and improves the working mechanism, which effectively protects our suppliers, such as:



**i. Procurement due diligence and transparency**

The Company uses a purchasing system that can connect suppliers. This system includes supplier qualification confirmation, open inquiry, platform quotation and system supervision by the procurement team to ensure that the process is transparent and follows appropriate due diligence steps. Some examples of our best practices are available below:

- Open inquiry system and a unified format of inquiry letters to make all registered suppliers receive the Company's purchase information timely, entirely and consistently, as well as to avoid secondary costs caused by unequal information and human errors, which can lead to unnecessary losses for the suppliers.
- The use of a quotation platform, in certain conditions, can also be referred to as a quotation list to reduce the discretion of purchasing staff so that we can improve the confidentiality of our purchase order. Thus, a fair and just environment could be enabled for our suppliers.
- System supervision to prevent anti-competitive behaviour between suppliers. In the selection process, no interpersonal relationship should be considered besides product performance and service quality.
- The use of a procurement platform displays information about our procurement resources and checks the qualifications of participating suppliers in bidding processes. Data recording and tracking are also used to ensure transparency and standardisation of every activity in procurement practices. At the same time, this platform also reduces the risks in the transaction and creates fair and just competition for suppliers.

**ii. The establishment of a supplier management system**

This system enabled us to collect and organise all supplier information and record and classify suppliers through due diligence, which will be helpful in the screening process. In addition, this system also enacted our anti-corruption policies and provided the fair and ethical business with suppliers.

**iii. Direct communication channels between suppliers and senior purchasing management**

- Authorised departments in the Company could establish direct communication channels with all suppliers to improve their working efficiency.
- The suppliers have the right to complain about any department to the senior management about any request for bribes, negative working attitudes, improper behaviour, and unfair treatment. Any reports will be treated in good faith and confidential.
- Once the report and complaint are verified, the senior management will take the required actions and prevent retaliation against the suppliers.

iv. **Local suppliers' prioritisation**

- We are committed to contributing to sustainable development in our operational areas and, more broadly, across the globe to create a positive legacy for future generations. We help stimulate economic growth in our operational regions by prioritising hiring local suppliers as long as they can deliver and meet the quality and price required in our projects.
- Nickel Industries also supported the development of local suppliers through knowledge sharing and technology utilisation to develop them gradually so they could become reliable partners of the Company.

## **7. Assessing the Effectiveness of Nickel Industries Modern Slavery Compliance Initiatives**

This document is Nickel Industries' third Modern Slavery Statement under the Australian Modern Slavery Act. The Company will regularly evaluate the effectiveness of this statement and its integration with other policies to evaluate whether the approach we have taken remains proportionate and in compliance with the Modern Slavery Act 2018.

## **8. Statement Approval**

This Modern Slavery Statement has been approved by the Board of Directors of the Company on 19 June 2023.

Signed by:



Justin Werner  
Managing Director