

MODERN SLAVERY POLICY

Scope

Andromeda Metals Limited (Andromeda) is committed to contributing to the ending of all forms of modern slavery and the policy outlines the Company's approach to reducing the risk of modern slavery practices within our supply groups and our operations.

The Australian Modern Slavery Act 2018 took effect on 1 January 2019 and requires Andromeda to make annual public reports (Modern Slavery Statements) on the actions to address modern slavery risks.

The purpose of this Policy is to ensure that the Andromeda:

- is compliant with local, national and other applicable laws and regulations in the areas in which the company operates.
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social and environmental practices.
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

Overview

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour, and
- deceptive recruiting for labour or services.

Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers, though these practices are also harmful and may be present in some situations of modern slavery.

Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business and can pose significant legal and reputational risks to entities.

Andromeda has a responsibility to respect human rights in their operations and supply chains, as outlined in the **United Nations Guiding Principles on Business and Human Rights**. This includes taking steps to assess and address modern slavery risks.

Limiting the risk of modern slavery practices through our Supply Chains

Andromeda will work proactively to reduce modern slavery within our supply chains. We expect all companies we engage with to do the same. All existing and new suppliers will comply with the principles set out in this policy and our *Code of Conduct*. It is our expectation that all suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed. Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify Andromeda as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

Limiting the risk of modern slavery practices through our operations.

Andromeda maintains a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within operations. The Policy provides guidance on the steps the Company will take to work with suppliers to reduce risks and the range of supports available for when a Company employee becomes aware that someone is at risk of or affected by modern slavery practices.

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

Communications, Engagement and Training.

Employees will be provided with communications and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery. Our *Modern Slavery Policy* will assist with awareness and will inform our employees the Company approach to limiting the risk of modern slavery within our supply chains and operations. We recognise the need to build the capability of our employees, particularly our procurement practitioners to identify potential red flags of modern slavery and human trafficking and the actions required to respond appropriately.

Reporting concerns of modern slavery

A key part of supporting ethical standards is enabling Andromeda employees and other people (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that people/companies or organisations are not acting ethically or in accordance with laws and obligations.

Concerns about compliance or ethical issues or illegal or unethical activities can be reported to **STOPline**, our whistle-blower hotline run by an external and independent third party. It is possible to make a report to **STOPline** via the following ways:

- Phone: 1300 30 45 50 if within Australia
- Email: makeareport@stopline.com.au
- Website: www.andromet.stoplilereport.com.au
- Post: PO Box 403, Diamond Creek, Victoria 3089

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

Governance

This policy has been approved by the Andromeda Metals Limited Board of Directors and the Executive Management Team are responsible for regularly reviewing the effectiveness of this policy.

Date:

28 May 2021

Record of reviews and relevant changes or amendments and/or reasons below:

Date	Version	Changes Made/Reasons for Changes	Changed By