Sandfire

Modern Slavery Statement

2026



We mine copper sustainably to energise the future.

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About this statement

Sandfire Resources Limited (Sandfire) has prepared this Modern Slavery Statement (statement) to meet the requirements of the *Australian Modern Slavery Act 2018* (Cth) (Australian Act) and the *UK Modern Slavery Act 2015* (UK Act) for the reporting period 1 July 2025 to 30 June 2026.

This is a joint statement made under section 14 of the Australian Act by Sandfire for SANDFIRE (ABN 55 105 154 185), Sandfire Resources Botswana Pty Ltd (ABN 78 003 103 544) and Sandfire Spain Holdings Pty Ltd (ABN 19 652 903 181) which are reporting entities under the Australian Act, as well as its other owned and controlled entities. This joint statement also covers Sandfire UK entities namely, Sandfire Spain Holdings Limited (13597580), Sandfire Spain UK Limited (13647222) and Metal Capital Ltd (09283833). A full list of owned and controlled entities is provided in the Appendix.

This statement details the actions that Sandfire, its reporting entities, and owned or controlled entities have taken to identify, and address, modern slavery risks in Sandfire's operations and supply chains during the reporting period.

This statement has been approved by the boards of the three Sandfire UK companies as per section 54(6)(a) of the UK Act.

This joint statement was approved on 25 August 2026 by the Sandfire Board of Directors (the Board) and signed by Brendan Harris, Chief Executive Officer and Managing Director, and John Richards, Non-Executive Chair, on behalf of the Company and all reporting entities under section 14(2)(d)(ii) of the Australian Act.

John Richards
Non-Executive Chair

Brendan Harris
Chief Executive Officer and Managing Director

In this statement, unless otherwise stated, references to 'Sandfire', the 'Company', the 'Group', 'our business', 'organisation', 'Assets', 'we', 'us', 'our' and 'ourselves' refer to Sandfire Resources Limited and its controlled entities.

All monetary amounts are expressed in US dollars.

Consultation

The drafting of this statement was led by Group Sustainability, in collaboration with Group and Asset functions including Procurement, Legal, Risk and People, on behalf of Sandfire and its reporting entities. Directors of each reporting entity reviewed the statement and provided feedback prior to approval.

The reporting entities are Australian subsidiaries of Sandfire that hold Sandfire's operating Assets, MATSA Copper Operations (MATSA) and Motheo Copper Operations (Motheo), within their ownership structures. These entities oversee Sandfire's international investments and do not undertake procurement or employment activities. Sandfire publishes this statement on their behalf.

Sandfire UK reporting entities are Metal Capital Ltd, Sandfire Spain UK Ltd, and Sandfire Spain Holdings Ltd. Sandfire also publishes this statement on their behalf.

MATSA's ownership Company Board, Minas de Aguas Tenidas, S.A.U. and Motheo's ownership Company Board, Tshukudu Metal Botswana (Pty) Ltd were engaged during the drafting of this statement including on risk mitigation actions. The MATSA shareholder company, Sandfire Resources (E.S.) Sociedad Limitada Unipessoal (SLU) was also briefed on the statement. Each company endorsed and supported the statement.

Sandfire has Group-wide policies and standards that apply across all owned and controlled entities, including those with operating Assets.

Verification

FY26 data contained in this report has been verified via internal processes. Deloitte has provided independent, limited assurance over selected people metrics reproduced in this report, as specified in the Independent Assurance Report, available in the Annual Report.

Forward-looking statements

This statement contains certain statements relating to Sandfire's policies and practices with respect to modern slavery risk management which may constitute forward-looking statements. Any forward-looking statements are based on management's current intentions and expectations held at the date of this statement and reflect judgements, assumptions, estimates and information available at the date of this statement. Actual events may vary from any forward-looking statements because future circumstances and results are subject to known and unknown risks and there is inherent uncertainty in possible policy, market conditions and regulatory developments.

Accordingly, Sandfire cautions against reliance on such statements and makes no representations or warranties in relation to such statements which do not represent guarantees or predictions of future performance. Except as required by applicable law or regulations, Sandfire does not undertake to publicly update or review any forward-looking statements.

This statement forms part of our FY26 Annual Reporting suite which includes:



Annual Report* | Modern Slavery Statement | Corporate Governance Statement | Sustainability Databook

*Incorporating our Climate Statement (Mandatory Sustainability Report) drafted in accordance with AASB S2 and our voluntary sustainability related disclosures.

All reports are available at www.sandfire.com.au

Acknowledgement of Country

Sandfire acknowledges the Traditional Custodians of the land on which we are headquartered, the Whadjuk people of the Noongar Nation, as well as the First Nations peoples of the lands on which Sandfire conducts its business. We pay our respects to Elders, past, present and emerging.

Regulatory disclosure matrix

Australian Modern Slavery Act 2018 (Cth) **Mandatory** Criteria Section 16	***UK Modern Slavery Act 2015*** **Recommended Reporting** Criteria Section 54	**Disclosure references**
Mandatory criteria 1: Identify the reporting entity.	Organisation's structure.	See the 'About this statement' section on page 1.
Mandatory criteria 2: Describe the structure, operations and supply chains of the reporting entity.	Organisation's business and its supply chains.	See the 'About Sandfire' section, page 5 - 8.
Mandatory criteria 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls.	Parts of the business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage the risk.	See the 'Identifying our modern slavery risks' (operations and supply chain risks) section, pages 9 - 13.
Mandatory criteria 4: Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Policies in relation to slavery and human trafficking. Due diligence processes in relation to slavery and human trafficking in its business and supply chains. Training on slavery and human trafficking available to employees.	See the 'Assessing and addressing our modern slavery risks' section, pages 14 - 20.
Mandatory criteria 5: Describe how the reporting entity assesses the effectiveness of such actions.	Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	See the 'Assessing our effectiveness' with metrics and outcomes section on page 21.
Mandatory criteria 6: Describe the process of consultation with any entities that the reporting entity owns or controls.	n/a	See the 'Consultation' section on page 1.
Mandatory criteria 7: Any other information that the reporting entity considers relevant.	n/a	See the 'Continuous improvement' section on page 4 and 'Collaboration and stakeholder engagement' section on page 23.

Ethics Line

Sandfire's Ethics Line is a confidential reporting service hosted by an external third-party provider. It is available (but not limited) to Sandfire employees and contractors and their families, members of the community, suppliers, customers and shareholders to report concerns related to our people or business conduct, including breaches of our Code of Conduct. Reports can be made anonymously and will be treated as strictly confidential.

Contact Ethics Line:

Phone (voice message in your language of choice, Company Code 4347):

Australia:	+ 61 251 142 052
Botswana:	+ 269 8 007 861 099 (only accessible through landline and Botswana's mobile phone services provider, Bemobile)
Portugal:	+ 35 1 304 502 651
Spain:	+ 34 910 477 636
United Kingdom:	+ 44 2 038 850 064

Website: sandfire.integrityline.com

Postal: Australia and Botswana
Sandfire Ethics Line
PO Box 1495
West Perth WA 6872
Australia

Postal: Portugal and Spain
Sandfire Ethics Line
Ctra. HU-7104 Km. 12,2
1330 Almonaster la Real (Huelva)
Spain

Message from the Chief Executive Officer and Managing Director



At Sandfire, respect is a core value, and this value guides how we work as an organisation, how we treat one another, how we work with our business partners, and how we engage with the communities in which we operate.

Respect means recognising the dignity, rights and wellbeing of everyone connected to our business, and it sits at the heart of our approach to human rights and modern slavery.

This shapes how we identify and address modern slavery risks, work with our suppliers and business partners, and continue to build safe and inclusive workplaces across our global operations.

Any risk to the wellbeing, safety or rights of people can have profound consequences, for individuals, communities and our business. That is why we embed respect for people in our decision making, helping us identify, prevent and address human rights risks.

Modern slavery remains a global challenge. We are committed to strengthening our approach, taking meaningful action where risks are identified, and keeping our values at the centre of our decision making.

Respect is not only a value at Sandfire, it forms the foundation of how we protect people, create lasting value for our company, and make a positive and lasting contribution to communities surrounding our global operations.



Brendan Harris
Chief Executive Officer and Managing Director

Read more about our approach to modern slavery

Continuous improvement

Our progress to date

We continue to enhance our human rights due diligence processes to better identify and respond to modern slavery risks across our operations and supply chains.

- MATSA strengthened its General Purchasing Conditions to include specific requirements relating to human rights and modern slavery. These conditions apply to all purchase orders and contracts.
- MATSA introduced a requirement for higher-risk suppliers to complete an environmental, social and governance (ESG) questionnaire during their onboarding to support enhanced ESG assessment.
- Motheo delivered specialised training on grievance management and remediation, and strengthened our Botswana Grievance Procedure.
- In Australia, we commenced implementation of our revised training program on human rights and modern slavery.

The table below outlines our progress against the FY26 and FY27 priorities we disclosed in our FY25 Modern Slavery Statement.

FY26 and FY27 priorities	FY26 progress
Embed our Procurement and Supplier Group Procedure.	Final approval, implementation and training will be a focus in FY27.
Deploy a digital solution to further streamline supplier onboarding, risk assessment and data tracking.	We are progressing the implementation of a new Enterprise Resource Planning (ERP) system which will address this priority.
Launch our risk-based supplier assessment program.	This is a multi-year program and updates will be provided in annual statements.
Advance supplier engagement to support meaningful dialogue.	We engaged five suppliers to provide additional information on existing controls they have in place to assess modern slavery risks.
Establish baseline metrics and commence internal reporting to track progress, measure effectiveness and inform future improvements.	We are streamlining our internal reporting and introducing additional effectiveness measures.

Looking ahead: FY27 and FY28 priorities

In FY27 and FY28, we will continue to embed our Supply Chain Human Rights Due Diligence Program and progress the practical implementation of our human rights and modern slavery commitments. Our priorities include:

- Reviewing the FY26 pilot of our Sandfire-specific human rights and modern slavery training program, refining content and supporting broader rollout across relevant teams.
- Continuing to work with Group Risk and Assurance to consider how human rights and modern slavery due diligence can be further integrated into risk-based assurance planning.
- Strengthening our approach to monitoring labour conditions of contracted and non-employee workers in higher-risk areas, including seafarer welfare and engagement with specialist partners.
- Reviewing Asset-level grievance mechanisms to assess effectiveness.
- Ongoing collaboration with industry and external stakeholders, including Human Rights in Resources and Energy Collaborative (HRREC), the UN Global Compact Network Australia and relevant investor and civil society forums, to inform our approach and support practical initiatives that improve outcomes for workers in our supply chains.

Together, these priorities support a practical, risk-based and measurable approach to strengthen our modern slavery response, which is aligned with our human rights commitments and regulatory expectations.



About Sandfire

Our business

Sandfire is an Australian Securities Exchange (ASX) listed mining company headquartered in Perth, Western Australia, with a global footprint. The Group comprises 26 owned or controlled entities, including two reporting entities under the Australian Act: Sandfire Resources Botswana Pty Ltd and Sandfire Spain Holdings Pty Ltd. These entities hold our principal operating Assets - Motheo in Botswana and MATSA in Spain.

Our operations focus on the production of copper concentrate and other metals. Motheo, located in the Kalahari Copper Belt in Botswana, commenced production in August 2023 and includes two open-pit mines and a central processing facility. Motheo produces high-quality copper concentrate (containing a silver by-product) from its centralised processing facility that is transported by truck to Walvis Bay, Namibia, for international shipment via vessels chartered by Sandfire under formal shipping agreements.

MATSA is located in the Iberian Pyrite Belt in Spain and includes a central processing facility and three underground mines producing copper, zinc, and lead mineral concentrates (containing a silver by product) that are transported to the port of Huelva, where title and control transfers to the customer under offtake agreements.

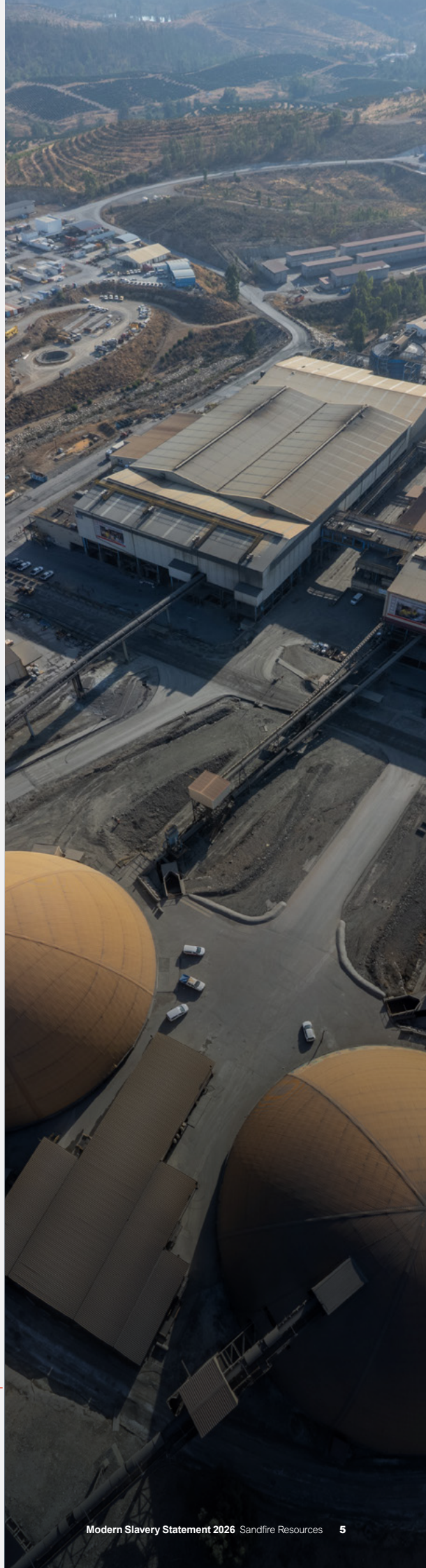
Our Australian Asset, the DeGrussa Operations (DeGrussa), is in care and maintenance, with closure and rehabilitation activities commencing.

Exploration is a core component of our strategy. We maintain active exploration programs in Botswana, Portugal, Spain and South Australia, which aim to extend mine life and support long-term resource development. These programs are designed to leverage our position in the Iberian Pyrite Belt and Kalahari Copper Belt and extend the longevity and value of our processing hubs. The Kalkaroo Copper-Gold Project and broader exploration program in the Curnamona Province in South Australia, have the potential to underpin a large-scale, long-life and low-cost operation in another preferred jurisdiction.

We mine copper sustainably to energise the future

Learn more about our purpose, strategy, values and The Sandfire Way

Sandfire



Our workforce

Our workforce includes directly employed personnel and those engaged through third-party contracting firms across five countries. As of 30 June 2026, we had 1,503 direct employees and approximately 3,285 full time equivalent (FTE) contractors working across our Assets, Exploration and in our Perth Corporate office.

As of 30 June 2026, we employed 129 people in our Perth office who perform professional, technical and administrative roles.

In addition, a small workforce of individuals fly in and out of Perth to our DeGrussa site. All are engaged under individual contracts in line with national awards.

As of 30 June 2026, we directly employed 392 people in Botswana and 955 people in Spain to support our operations and exploration activities. These roles include professionals, technical and administrative staff. We also directly employed seven people in Portugal.

Operational activities at both MATSA and Motheo are partly delivered through third-party contracting firms, engaged under formal agreements. The majority of Motheo's contractor workforce is involved in open-pit mining, site services and drilling activities, including near-mine exploration. At MATSA, most contracted personnel are involved in underground mining and processing activities.

4,788

Total workforce



1,503

Direct employees



Employees covered by collective agreements

Australia

All of our Australian employees are covered under individual contracts aligned with national awards

Botswana - 64%

Under enterprise bargaining agreements

Spain - 100%

Under enterprise bargaining agreements

Direct employee distribution by role

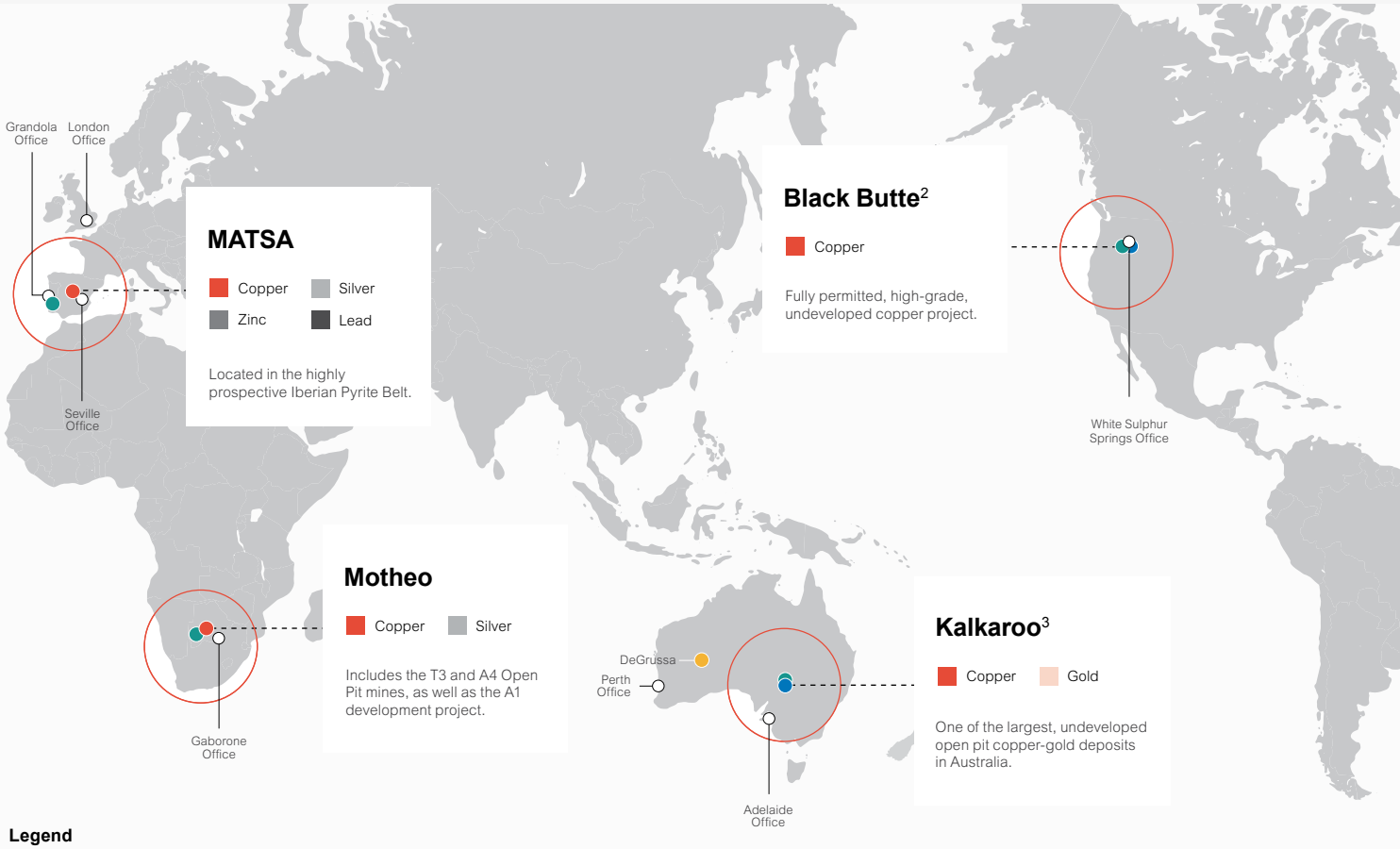


For more information about our workforce, see our FY26 Sustainability Databook.

A safe, respectful and inclusive workforce is central to how we uphold human rights and manage modern slavery risks across our operations, partnerships and supply chains.

1 Senior leadership positions include the Executive Leadership Team and senior leaders.

Where we operate



Our supply chain

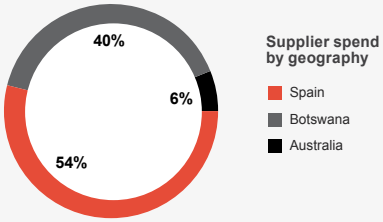
In FY26, we spent approximately $884.1M on goods and services across all operations, a 16 per cent increase on our FY25 spend of $742.4M. We work with close to 1,900 global suppliers, ranging from large multinational corporations to small, community-based providers.

The goods and services we procure support a wide range of activities across exploration, mining and corporate services. The largest proportion of our spend was directed toward underground and open pit mining services.

Our top spend categories were determined based on their share of total procurement spend across all operations.

FY26 supplier spend

$884.1M



Category	Definitions	Top direct sourcing countries
Mining services	Underground and open pit mining services	Botswana, Spain
Energy	Power supply	Australia, Botswana, Spain
Equipment	Mining and processing equipment	Botswana, Spain

2 Sandfire's effective interest in Black Butte is held via an 87 per cent equity stake in TSX listed Sandfire Resources America Inc. (TSX-V: SFR), which owns 100 per cent of Black Butte.
3 Sandfire holds an exclusive right to acquire an 80 per cent interest in the Kalkaroo Copper-Gold project in South Australia.

Our value chain

We create value by supplying copper which is used in many aspects of modern life and is a critical metal for global economic growth.

1.



Exploration and discovery

We seek to materially increase the life of our modern processing hubs and identify valuable deposits through our targeted exploration activities.

2.



Develop and acquire

We undertake careful planning to ensure we maximise efficiencies and minimise negative impacts to the environment and the community, and add attractive options for the future by undertaking selective and disciplined M&A activity.

3.



Mine and process

We seek to optimise output through the use of innovation and technology where safety is our number one priority.

4.



Transport to customers

Our metal concentrates are transported to nearby ports where they are shipped by third parties to customers across the globe.

5.



Sales and marketing

We use our expertise to understand demand and ensure our product meets the requirements of our customers.

6.



Closure and rehabilitation

We undertake mine closure planning throughout the life of our Assets to create safe, stable, non-polluting, and self-sustaining land post closure.

Identifying our modern slavery risks

We are committed to respecting all human rights, including the right to freedom from slavery. To meet this commitment, we work to identify, assess and address modern slavery risks throughout our operations and supply chain.

Our integrated Risk Management Framework

Our integrated Risk Management Framework (RMF) reflects the risk appetite set by our Board and forms the cornerstone of our Governance Framework. It outlines accountabilities for the identification, assessment and management of risks across the business, including human rights and modern slavery risks.

The RMF incorporates our Risk Management Policy and Risk Management Group Standard and supports a consistent approach to risk management across our global operations. It is aligned with the International Standard for Risk Management AS/NZS ISO 31000:2018 and includes ongoing monitoring of internal and external factors that may impact our operations, supply chains and stakeholders.

Through the RMF, we focus on continuous improvement and the early identification of emerging risks and opportunities. This supports informed decision-making, prioritisation of controls and compliance with applicable legal and regulatory requirements.

Our approach to identifying, assessing and managing modern slavery risks is guided by the RMF. We are continuing to embed human rights considerations into enterprise risk processes, supplier due diligence, operational decision-making and governance structures.

Read more about our approach to risk management



Our salient human rights issues

Labour rights have been identified as one of our seven salient human rights issues; those that are most severe in terms of potential negative impact through our business activities. We report on these salient issues in the Human Rights section of our Voluntary Sustainability Report, within our FY26 Annual Report. This statement focuses on labour rights, including risks related to modern slavery, child labour, excessive working hours, and restrictions on freedom of association.

Recognising labour rights as a salient issue reflects our belief that modern slavery is a fundamental human rights concern, not solely a compliance issue. This continues to inform our due diligence approach and how we prioritise action across our operations and supply chains.

Consistent with the UNGPs, we apply the 'continuum of involvement' to assess whether Sandfire may cause, contribute to, or be directly linked to adverse human rights impacts.

Our assessment indicates that we are more likely to be directly linked to, or contribute to, modern slavery risks within our extended supply chains rather than through our direct operations. These findings are reflected in our risk categorisation (see page 12).

Our Group-wide salient human rights issues remain unchanged from those reported in FY24 and FY25.

Continuum of involvement

We apply the UNGPs 'continuum of involvement' to assess and describe our risk of involvement in modern slavery and other impacts to human rights.

Cause

A business may cause modern slavery or other human rights harm where its actions directly result in modern slavery occurring.

- We have assessed that we have a low risk of causing modern slavery at our operations.
- We acknowledge that modern slavery still exists in our countries of operation and that a low prevalence of modern slavery does not negate the risk of it occurring.

Contribute

A business may contribute to modern slavery or other human rights harm where its actions or inactions facilitate or incentivise modern slavery.

- We could contribute to modern slavery if we imposed conditions on suppliers such as timeframes and pricing that could only be met by exploiting their workers.

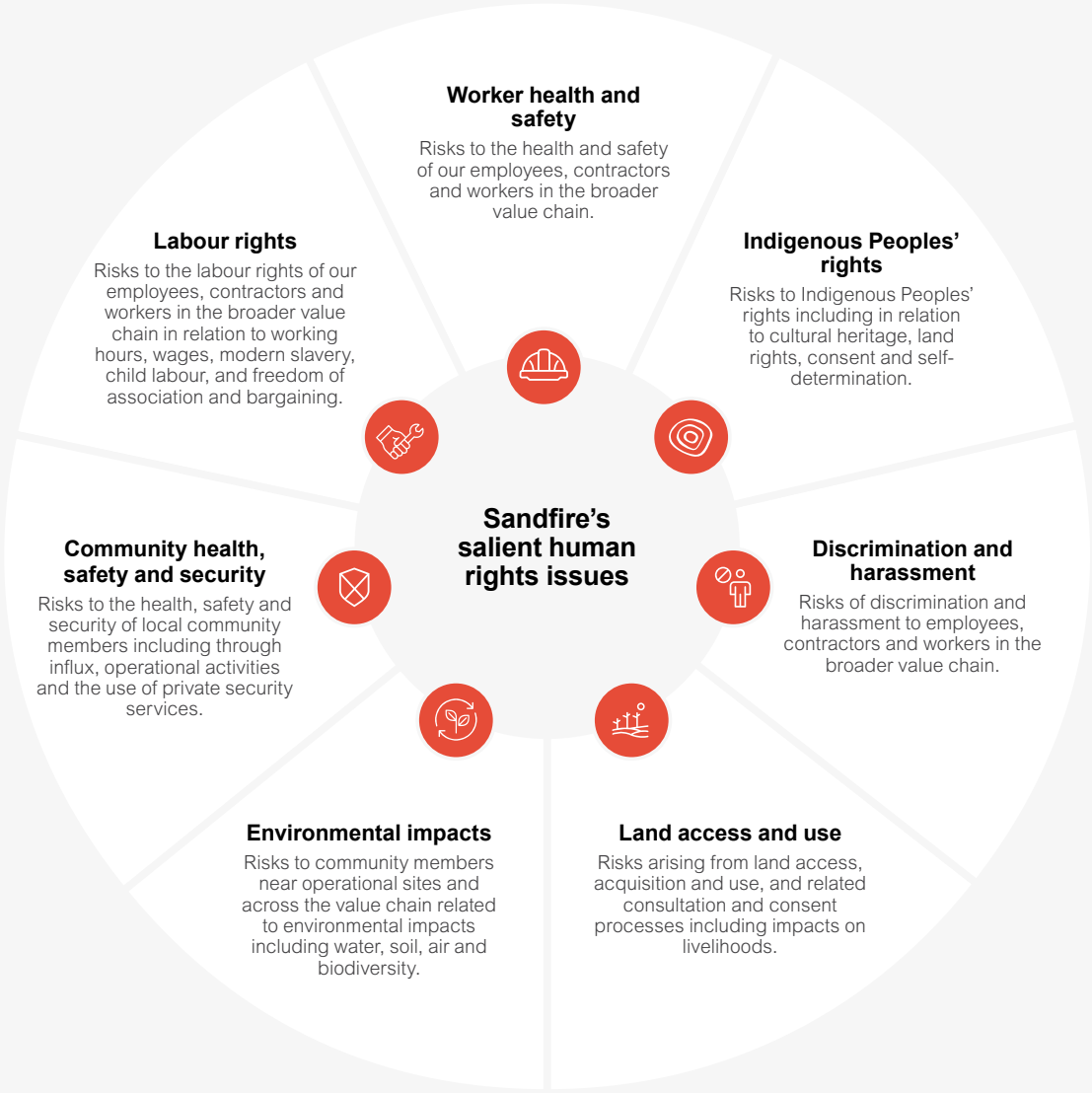
Directly linked

A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in our extended supply chain.

- We may be directly linked to modern slavery, where we are connected to exploitation through our business relationships including and beyond our Tier 1 suppliers.

Identifying and managing human rights and modern slavery risks across our workforce, partnerships and supply chains is central to responsible business.

Sandfire's salient human rights issues



Modern slavery risks in our operations

The extractive industry is widely recognised as having an elevated risk of modern slavery due to its presence in some jurisdictions with weaker labour protections, reliance on contract labour, and complex supply chains. This assessment is supported by the UN Principles for Responsible Investment and the International Labour Organization.

Based on our salient human rights assessment, our direct operations continue to present a lower risk profile relative to other contexts within the extractive sector, that may be more vulnerable to human rights abuses.

Our global operations in Australia, Botswana and Spain and exploration activities in Portugal, have been assessed against the Walk Free Global Slavery Index as having lower prevalence of modern slavery and stronger government responses.

Our mining and production methods, characterised by advanced infrastructure, skilled workforces and controlled operating environments, further reduce our exposure to modern slavery risks in our direct operations.

Regardless, we recognise that risks may still arise, particularly in areas where visibility and oversight are more limited.

Modern slavery risks in our supply chain

The following factors have been identified as having the greatest potential to elevate modern slavery risks in our supply chain:

Industry: Sectors with complex supply chains and reliance on low-skilled or temporary labour.

Type of product or service: Goods and services with high-risk production methods or raw materials.

Geography: Regions with weak labour protections or vulnerable populations.

Supply chain model: Use of subcontracting, labour hire, or cost-driven procurement models that may increase the risk of exploitative practices.

We completed a high-risk procurement assessment of our Tier 1 suppliers using our Modern Slavery Risk Assessment Matrix (MSRAM). The assessment showed only a minor shift in risk categories compared with the previous year, with most categories remaining unchanged.

Category	Potential risk factors	Potential risk exposure	Potential linkage
Mining and technical services	• Reliance on contractors, subcontractors and labour hire • Remote workforces with limited visibility over conditions • Recruitment and cost pressures may increase labour risks	Contracted specialist services supporting mining, processing and maintenance activities	Directly linked
Energy (including renewable energy)	• Sourcing of critical minerals (e.g. cobalt, polysilicon) from high-risk regions with reported forced or child labour • Limited transparency in supply chains	Procured through multiple suppliers to support operational activities at our Assets	Directly linked
Mining and processing equipment	• Sourcing of raw materials and components from suppliers with limited transparency and potential exposure to labour rights violations	Procured through multiple suppliers to support operational activities at our Assets	Directly linked
Transport, haulage and logistics (includes shipping and road haulage)	• Reliance on low-skilled, often migrant labour • Limited visibility over labour conditions in subcontracted maritime transport services • Limited visibility over labour conditions in subcontracted road freight services	Chartering vessels for international transport of copper concentrate Engaging haulage contractors at Motheo and MATSA	Contribute, directly linked
Fuel	• Sourcing from regions with weak labour protections and limited transparency in extraction and refining processes • Complex logistics chains with limited visibility	Fuel is one of our largest operational inputs, procured through third-party suppliers for use across our sites	Directly linked
Exploration drilling	• Reliance on specialist contractors and subcontractors • Remote workforces with reduced visibility over labour conditions	Exploration drilling contractors engaged across project areas	Directly linked
Cements	• Sourcing from regions with weak enforcement of labour rights • Use of subcontracting in lower tiers where oversight is limited	Used in underground operations and projects	Directly linked
Facilities management (catering and cleaning)	• Outsourced service models with limited oversight • Roles often filled by migrant or seasonal workers in low-paid, gendered positions	Contractors engaged at mine sites, office cleaning managed by landlords	Contribute, directly linked
Construction	• Use of labour hire and subcontracting • Reliance on low-skilled work • Raw materials sourced from high-risk regions (those identified by the Walk Free Global Slavery Index 2023)	Direct and subcontracted workers at Motheo and MATSA	Contribute, directly linked
Financial services (including insurance)	• Exposure through financing, insurance and investment relationships • Outsourced or offshore providers with limited visibility over conditions • Complex service supply chains, including technology and claims support	Banking, insurance, brokerage and other financial services used to support corporate, operational and project activities	Directly linked
Consulting	• Reliance on specialist services, subcontractors and outsourced teams • Offshore support centres with limited visibility over conditions • Project cost and time pressures may increase labour risks	Professional advisory, technical, legal, assurance and project support services engaged across corporate functions and operations	Directly linked
Electrical products, components and IT services/ software	• Manufacturing in low-regulation jurisdictions • Use of conflict minerals (e.g. cobalt, tin, gold) • Limited supply chain transparency	Procured for operations (e.g. laptops, instrumentation) via multiple suppliers	Directly linked

In action

Strengthening our vessel screening approach

In FY26, we reviewed supply chain activities within our sales and marketing function through a human rights lens, with a particular focus on the shipping arrangements of copper concentrate from Motheo.

Under current contractual arrangements, Sandfire retains responsibility for transporting copper concentrate by road transport from Motheo to Walvis Bay, Namibia, and ocean freight from Walvis Bay to the customer's nominated destination port.

Shipping presents a high potential risk area for human rights and modern slavery due to well-documented labour rights violations and worker vulnerabilities within the maritime industry.

We charter individual vessels based on each shipment, contract and customer arrangement, with limited or no reliance on a single vessel, operator or fixed shipping route. Each shipment involves different counterparties, vessels, ownership structures, flags, routes, destination ports, and due diligence must be undertaken on a transaction-by-transaction basis. Due diligence includes screening each proposed vessel and reviewing the relevant charter party and customer arrangements before the shipment proceeds.

Our vessel screening process assesses risks relating to sanctions, vessel safety, vessel ownership transparency, flag state, regulatory compliance and insurance.

We recognise that these factors may provide indicators of broader governance and labour risks, including those relating to seafarer welfare, working conditions, recruitment practices and access to remedy. Where screening identifies potential concerns, we seek additional information before proceeding with commercial arrangements.

To support this process, we use multiple third-party screening tools and external databases to review proposed vessels and related parties. This is supported by an independent shipping specialist, who provides additional detail and verification as required.

Our charter party documentation requires vessels to:

- Comply with applicable international maritime conventions
- Maintain valid certification under the International Safety Management (ISM) Code and the International Ship and Port Facility Security (ISPS) Code
- Hold protection and indemnity insurance
- Comply with applicable sanctions and regulatory requirements
- Adhere to International Transport Workers' Federation (ITF) acceptable crew employment conditions.

These requirements help establish baseline expectations in relation to vessel governance, safety, regulatory compliance and crew welfare. They also provide a contractual mechanism for communicating our expectations on responsible shipping practices and labour conditions.

We recognise that contractual requirements and vessel screening alone do not eliminate the risk of modern slavery or other adverse human rights impacts in shipping. This work however has helped us build a clearer understanding of where risks may arise, the types of indicators that require closer review, and how we can consistently apply due diligence across individual shipping arrangements.

We will continue to strengthen our approach over time and our priorities in FY27 and FY28 include:

- Enhancing vessel monitoring for indicators relating to seafarer working conditions.
- Continued engagement with independent shipping specialists and partners to provide practical, on-the-ground support where required.

"Every shipment gives us an opportunity to reinforce our expectations for responsible shipping. By taking a transaction-by-transaction approach to due diligence, we can better understand potential risks and ask the right questions."

Ben Hooper, Sales Manager



Assessing and addressing our modern slavery risks

Governance

Sandfire is committed to fostering a culture of good corporate governance underpinned by ethical behaviours and robust systems and processes.

Board of Directors

Our Board represents the Company's shareholders and is appointed to act in the best interests of Sandfire while promoting sustainable long-term value. The Board operates under a Charter that sets out its role and responsibilities, including approving the Company's strategic direction.

The Board has oversight of sustainability and human rights matters, including modern slavery. On recommendation from the Sustainability Committee, the Board reviews and approves Sandfire's annual Modern Slavery Statement.

In FY26, the Board received updates on Sandfire's human rights and supply chain due diligence programs, including progress made over the previous 12 months.

Board Committees

The Board's oversight of human rights-related matters is supported by the Sustainability Committee and Audit and Risk Committee. Committee Chairs report to the Board following each committee meeting. Directors are given access to all committee briefing papers and minutes and are invited to attend all meetings.

Sustainability Committee

The Board's Sustainability Committee oversees Sandfire's policies and practices related to sustainability, including human rights and modern slavery. The Committee is responsible for monitoring compliance, assessing related risks, and ensuring appropriate governance and reporting frameworks are in place.

In FY26, the Committee received updates on a number of human rights matters including how the risks of modern slavery are being addressed in our value chain and our attendance at the Australian Act review consultation session with the Attorney General's Department and the Australian Anti-Slavery Commissioners' position paper on legislative reform.

Audit and Risk Committee

The Board's Audit and Risk Committee oversees enterprise risk management, including human rights and modern slavery risks, as part of operational and reputational risk considerations.

Good governance is essential to maintaining our social licence to operate.

Read more abour our approach to governance

CEO and Executive Leadership Team

The CEO has overall accountability for sustainability, including human rights and modern slavery. This responsibility is delegated to the Chief Sustainability Officer (CSO), who leads our human rights approach with core accountability for standards, due diligence programs and reporting.

The CSO oversees the integration of human rights and modern slavery considerations across relevant business activities, including risk management, supplier due diligence, grievance mechanisms, training and disclosures.

This includes:

- Reporting key risks, actions and progress to the Board and relevant committees.
- Supporting due diligence for acquisitions, divestments and material operational or supply chain changes.
- Advising the Executive Leadership Team (ELT), Board and Investor Relations function on relevant risks, expectations and reporting requirements.

The CSO works with the ELT, Group functions and Assets to monitor controls, support due diligence and escalate material human rights or modern slavery risks through established governance channels.

Sustainability Functional Leadership Team forums also provide a mechanism for senior leaders to discuss human rights, due diligence, grievance management, training, assurance activities and progress against agreed work programs.

Relevant members of the management team are responsible for considering human rights and modern slavery risks in business planning, procurement, operational decision-making and stakeholder engagement, supported by Group standards and procedures.

The role of our teams

We operate under a decentralised model, where Group functions set the strategy and minimum requirements through policies, standards, and procedures, while Assets are accountable for meeting these requirements and managing risks at the operational level.

Our modern slavery response is supported by an integrated effort between Group functions and Assets.

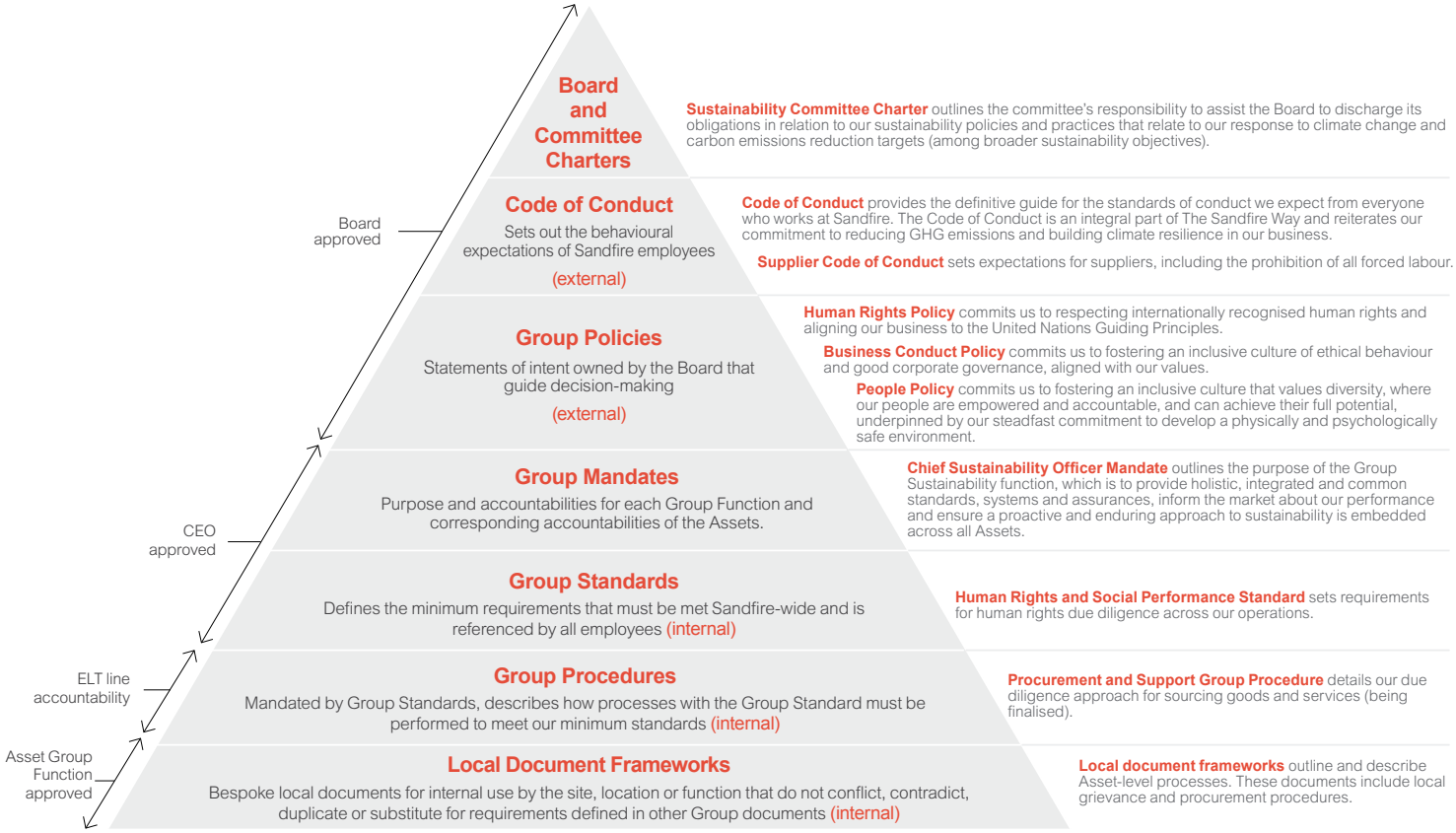
Team	Role in modern slavery response
Group Sustainability	Maintains our Human Rights Policy and sets minimum standards for human rights, including due diligence. Acts as the subject matter expert on modern slavery and guides the Assets on response, remedy and new requirements. Coordinates the annual Modern Slavery Statement and ensures alignment with regulatory and policy commitments.
Group Procurement	Maintains Group Procurement and Supplier standards and procedures, including minimum requirements for supplier pre-qualification, onboarding and management, and governance of procurement processes across the Group, including compliance with human rights requirements and management of supply chain risks.
Group Legal and Compliance	Provides legal guidance on modern slavery, including contractual clauses in supplier agreements. Supports the investigation of modern slavery-related complaints received through the Ethics Line.
Group Risk and Assurance	Maintains the Risk Management Policy and Risk Management Group Standard which sets minimum requirements and performance standards for assessing and managing risks. Provides regular updates to the Board and its committees on risk, which can include risks relating to modern slavery and human rights. Maintains the Assurance Group Standard which sets minimum requirements and performance standards for assurance, which may include assurance activities relating to human rights and modern slavery risks.
Group People	Maintains Our People Policy and standards. Upholds labour rights, including freedom of association and non-discrimination for Sandfire employees.
Assets	Implements modern slavery and human rights due diligence actions at the operational level, including supplier engagement, risk mitigation, control verification, while ensuring all reporting is aligned with Group standards and procedures.



Policies, standards and procedures

Our policies, standards and procedures set clear expectations for respecting human rights and managing modern slavery risks across our operations and supply chain. Our key policies, including the Code of Conduct and Supplier Code of Conduct, are publicly available on our website, while internal documents are accessible via our intranet.

All documents are available in English and Spanish to support consistent understanding and application across the Group.



Procurement and Suppliers Group Procedure

In FY26, we progressed the development of a Procurement and Suppliers Group Procedure to strengthen how modern slavery and broader human rights risks are considered in supplier onboarding and management.

We also continued to support implementation of our MSRAM, which is designed to help determine the level of due diligence required for suppliers based on risk indicators such as sector, goods or services provided, geography and other relevant factors.

In FY27, we will finalise the procedure and support implementation through targeted human rights and modern slavery training.



Addressing labour rights risks in our workforce

Our salient human rights assessment determined the likelihood of modern slavery occurring in our direct workforce to be low. However, we recognise that labour rights risks can still exist and to proactively manage these risks, we apply the following measures when engaging direct employees:

- Identity and age verification: We conduct identity and age checks prior to employment for compliance with legal working age requirements. In accordance with mining legislation in Botswana, Spain and Australia, we cannot employ anyone under the age of 18 at our Assets, because mining is classified as hazardous work in all three jurisdictions.
- Employment contracts: All employees receive a written employment contract in their preferred language, clearly outlining terms and conditions, including shift arrangements for operational roles.
- Fair remuneration: Employees are paid their full legal entitlements on time. Payslips detail all payments, deductions and leave balances for transparency. We conduct an annual salary review against industry benchmarks to check for competitiveness and fairness. Every two years we undertake a wage compliance audit against enterprise bargaining agreements and legislative requirements.
- Training and induction: Employees undergo mandatory Code of Conduct training and site-specific inductions to understand their rights, responsibilities and workplace expectations.
- Grievance mechanisms: We offer multiple channels for employees and contractors to raise concerns, including a third-party service accessible to employees, contractors and their families.
- Health screening: Pre-employment medical assessments are required for all personnel to establish baselines, including hearing and respiratory function.
- Employee Assistance Programs: Free, confidential support services are available to employees and their families to provide support and promote mental health and wellbeing.
- Accommodation: At our drive-in, drive-out (DIDO) or fly-in, fly-out (FIFO) operations and exploration sites, we provide food and safe, clean accommodation and facilities.
- Equal conditions for contractors: Contractor personnel and labour hire workers who work on our sites, work under the same safe conditions and standards as Sandfire employees.

In FY27 and FY28, we will undertake a review of labour conditions for contracted workers in higher-risk work areas, including contractors engaged at our Assets. This review will be undertaken with key partners and will focus on identifying practical opportunities to strengthen due diligence, monitoring and access to grievance mechanisms for non-employee workers.

"Respecting human rights isn't just a responsibility, it's a commitment we demonstrate through every decision we make. When we champion fairness, inclusion and equal opportunity for every person, we don't just strengthen our culture we build a safer, more ethical and more sustainable organisation."

Iris Belliot, Principal People Partner



Addressing supply chain risk

Supply chain human rights due diligence program

We are committed to aligning with the UNGPs, including the Protect, Respect and Remedy framework. In FY25, we developed a three-year Supply Chain Human Rights Due Diligence (HRDD) Program to guide how we identify, assess and address the potential for exposure to modern slavery and broader labour rights risks in our supply chain.

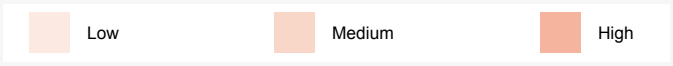
In FY26, we continued to implement and enhance this program, building awareness across the Group and providing practical support to identify and manage human rights risks. We reviewed and updated the program, undertook supplier demonstrations for risk assessment tools, conducted a pilot training session with key stakeholders, and worked with Assets to support their due diligence requirements.

Modern Slavery Risk Assessment Matrix

Our MSRAM was developed to provide a clear and consistent process for assessing supplier risk.

Risk level	Sector risk	Goods and service risk	Geographic risk
Low	1	1	1
Medium	2	2	2
High	3	3	3

Overall score 3: Low risk
Overall score 4-6: Medium risk
Overall score 7-9: High risk



	Description	Potential example
Sector risk	Certain industries are structurally higher risk due to their reliance on low-skilled labour, hazardous work, or complex supply chains. For example, sectors such as construction, mining, cleaning and electronics may be assigned a score of 3.	A construction contractor engaged for major works may be assessed as higher risk because the sector often relies on subcontracting, temporary labour and physically demanding work in time-pressured environments.
Goods and service risk	Certain goods or services may present elevated risk regardless of sector, particularly where production methods involve vulnerable workers. For example, items such as PPE, cement, fuel and electrical components, and services such as labour hire and transport, may be assigned a score of 3.	PPE or electrical components sourced through multiple tiers of suppliers may present elevated risk where manufacturing involves outsourced production, low-paid labour or limited visibility over recruitment and working conditions.
Geographic risk	Risk may also vary depending on the country of origin of goods or the location of service delivery. We use the Walk Free Global Slavery Index (2023) to inform country risk ratings. For example, countries such as China, India and Bangladesh may be assigned a score of 3, while Australia, Spain and Botswana may be assigned a score of 1.	A supplier that manufactures goods in a country with weaker labour protections or higher prevalence of forced labour may receive a higher geographic risk score than an equivalent supplier operating in Australia, Spain or Botswana.

Supplier assessment

In early FY26, we completed a supply chain risk assessment supported by active supplier data from FY25 from our core locations in Botswana, Spain and Australia. We applied a risk-based approach in an initial assessment of the 20 highest-spend suppliers from Australia, Botswana and Spain. Each supplier was assessed using the MSRAM, with additional screening applied to consider broader human rights risks. These suppliers represent approximately three per cent of our global supplier base of approximately 1,900 suppliers and 79 per cent of FY25 total spend.

Of these 60 suppliers, 14 recorded an MSRAM score of six or above and were subject to enhanced due diligence. This process included a London Stock Exchange Group (LSEG) compliance check, review of contractual terms and conditions, company analysis, a low-level review of tier one supply chain information, and an assessment of human rights and labour risks within, or connected to, each supplier. The assessment was undertaken by a specialist to support a more nuanced understanding of supplier-specific risk.

Based on the outcome of this assessment, five suppliers were issued a supplier self-assessment questionnaire (SAQ) to obtain further information on their governance, policies, labour practices, subcontracting arrangements, grievance mechanisms and modern slavery controls. We continue to engage with these suppliers regarding their modern slavery programs of work.

Building on the assessment, we will work with our internal Procurement teams to support proactive supplier engagement. We will also develop guidance to manage suppliers that do not respond or where controls are inadequate. This may include further requests, engagement with contract owners, supplier meetings, corrective action plans, enhanced contractual controls or a review of future procurement decisions. We will continue to progress automation of the supplier risk screening process so internal resources can focus on complex assessments, supplier engagement and mitigation planning.

Contract terms and conditions

Contractual obligations are a key mechanism for embedding human rights due diligence in our supply chain. Our standard contract templates in Australia and Botswana require compliance with our Supplier Code of Conduct and include modern slavery clauses requiring suppliers to take reasonable steps to prevent modern slavery in their operations and supply chains, and to support us in meeting our legislative obligations.

In Spain, our contracts are being revised to include provisions related to forced labour and require compliance with the MATSA Supplier Code of Conduct. In FY27, MATSA's General Purchasing Conditions, which are attached to all purchase orders and contracts, will include specific requirements relating to human rights and modern slavery. Suppliers considered to be higher risk will be required to complete an ESG questionnaire as part of their onboarding, covering specific risk areas that address modern slavery. As the program develops, consideration will be given to extending it more broadly across the supplier database.

In FY26, Group Legal reviewed our standard modern slavery clauses and confirmed they were compliant, fit for purpose and appropriately required suppliers to take reasonable steps to ensure that its personnel and supply chain do not engage in any conduct which would constitute a modern slavery practice or an offence under any modern slavery law.

"Every procurement decision is an opportunity to influence better outcomes. For me, this means looking beyond price and delivery to consider the impact our decisions have on people, communities and long-term business resilience. By keeping human rights risks front of mind and being clear with suppliers about our expectations, we can support ethical, sustainable and responsible business practices."

Jo Reynolds, Contracts Specialist (Projects)



Grievance management and remedy

We are committed to addressing any adverse human rights impacts either caused or contributed to by our business activities. An effective grievance mechanism assists with the identification, investigation and remediation of possible issues.

We provide two primary channels for raising complaints and grievances[4]:

- Community grievance mechanism: This mechanism is available to anyone within the communities where we work that may be impacted by our activities. It outlines how grievances are assessed and resolved, including expected response timeframes.
- Ethics Line: This hotline is accessible to our workforce, including employees, contractors, their families and our suppliers. Information about the hotline is communicated through our Code of Conduct, during onboarding inductions, and prominently displayed posters in our offices, work areas, website and intranet. Information about the availability of the hotline is also communicated via our Supplier Code of Conduct.

In FY26, 29 potential breaches of the Code were reported, triaged and where appropriate investigated. We received zero grievances and 40 complaints via our community mechanisms in FY26. One complaint related to the underpayment of subcontractors which is a potential indicator of modern slavery. This is still under investigation.

In FY27, we will review our grievance mechanisms to assess effectiveness and continue building internal capability.

Training and awareness

Training and awareness are key controls we use to manage modern slavery risks. We aim to build internal capability, so our employees are equipped to identify, assess and respond to human rights risks across our operations and supply chain.

In FY26, we discontinued our United Nations Global Compact (UNGC) *Operationalising the UNGPs* training, shifting to a tailored program.

We reviewed our existing training programs and developed a Sandfire-specific business and human rights training program, with a dedicated module on modern slavery. We implemented a pilot of the structured plan with key internal stakeholders in FY26 to help strengthen and better integrate human rights training, including modern slavery, across the Company. As a result of the pilot training program, some further adjustments will be made ahead of a broader rollout in FY27.

We strengthened related training programs including our mandatory Code of Conduct and security training to better incorporate human rights considerations and align with the Voluntary Principles on Security and Human Rights.

We also facilitated an awareness session on grievance mechanisms and human rights remedy for our Sustainability Community of Practice.

Targeted training sessions were also conducted with employees to support capability building where needed. For example, in FY26 our Botswana team received training focused on grievance management, to ensure contracted workers were included and provided an additional channel for reporting potential labour-related risks.

In action

Strengthening community and worker grievance mechanisms

In FY26, we completed a review of Motheo's grievance mechanisms. This review sought to ensure the mechanisms remain consistent, accessible and effective for our communities and broader stakeholders.

To improve accessibility, we expanded the scope of the mechanism to allow anyone to raise a concern, including contractors and supply chain workers.

We also developed a bilingual (English and Setswana) graphic to clearly communicate the grievance process and strengthened internal reporting processes to support more accurate and consistent record-keeping.

The review was undertaken by Group Sustainability in collaboration with the Motheo and Botswana Exploration teams. Targeted training was introduced to build internal capability in grievance management and reinforce the consistent application of the process.

Bi-lingual graphic of Botswana Grievance Mechanism



Submit grievance
Rola ngongorego
Report an issue

Acknowledge and assess
Amogela o dire tshekatsheko
Review and classify

Discuss and resolve
Tshwara puisanyo le tharabololo
Find a solution

Implement action
Dira tiro
Agree and act

Close and follow up
Latedisa kgang o o e tswale
Confirm resolution and finalise

4 See page 25 for definition of complaint and grievance.

Assessing our effectiveness

We assess the effectiveness of our approach to managing modern slavery risks through a combination of performance monitoring, risk analysis and stakeholder engagement. This helps us understand whether our actions are driving meaningful outcomes and where further improvement is required.

We do this by:

- Monitoring progress against our commitments and key initiatives, including those set out in this statement and our broader human rights program.
- Tracking and analysing trends across Asset and Group-level grievance mechanisms to identify emerging issues and areas for improvement.
- Undertaking risk assessments that incorporate human rights considerations, including modern slavery risks within our operations and supply chains.
- Seeking feedback from internal and external stakeholders to inform continuous improvement of our approach.
- Reviewing external assessments and benchmarks relevant to our modern slavery disclosures to identify opportunities to strengthen transparency and performance.



Response area	How we assess effectiveness	FY26 key outcomes
Governance	Regular review and update of policies and standards.	All sustainability standards and procedures are up to date as per their review schedules.
	Assurance against policies and standards.	People data was subject to limited assurance and further assurance activities will continue in FY27 and FY28.
	Number of Board and Sustainability Committee meetings with human rights briefings including on modern slavery.	Updates on modern slavery/human rights occurred at two Board and four Sustainability Committee meetings.
Strategy	Achievement of public commitments.	All commitments have progressed with delivery expected in FY27 and FY28.
Our workforce	Number of employees covered by collective bargaining agreements.	100% of employees in Spain and 64% of employees in Botswana are covered under collective bargaining agreements.
Supplier due diligence	Number of suppliers screened.	82% of our high-risk suppliers have been screened.
	Completion of SAQ responses.	89% of our SAQs issued in FY26 were completed by suppliers.
	Number of high-risk suppliers subject to further due diligence.	16 identified high-risk suppliers were subjected to further due diligence and we continue to engage with these suppliers.
Complaints and grievances	Number of complaints or grievances raised through community grievance mechanism.	Zero grievances and 40 complaints were raised in FY26. One complaint included an indicator of modern slavery.
	Number of potential breaches raised through Ethics Line.	29 potential breaches of the Code of Conduct were raised in FY26. None were related to modern slavery.
Training and competency	Number of employees receiving human rights training.	13 employees were part of a pilot for a specialist human rights and modern slavery training course.
	Number of employees receiving specific modern slavery training.	15 employees completed modern slavery training at the Perth office.
Collaboration and engagement	Number of external meetings attended relating to modern slavery or broader human rights.	Sandfire representatives attended four HRREC and three external meetings.
	Number of engagements with external stakeholders relating to modern slavery or human rights.	Attended four United Nations GCNA Modern Slavery Community of Practice meetings. Information on our management of modern slavery was provided to a key investor group at their request.
	Results from external assessments of our modern slavery disclosures.	Monash University rated Sandfire's FY24 Modern Slavery Statement as 'A' (the highest rating), as reported in December 2025.

Collaboration and stakeholder engagement

We actively seek opportunities to engage and collaborate with internal and external stakeholders to strengthen our approach to managing modern slavery risks.

During the reporting period, we participated in the following engagements:

- A roundtable with the Commonwealth Anti-Slavery Business Engagement Directors and the HRREC, gaining insights into evolving expectations for modern slavery risk management and human rights due diligence.
- Consultation events with the Commonwealth Attorney-General's Department on proposed reforms to the Australian Act.
- Multiple UNGC events, including the Modern Slavery Community of Practice series and UNiting Business Live. We are also part of the GCNA Advanced Human Rights Diligence Working Group.
- Multiple HRREC meetings and the Remediation Consultation Series, and contributed as a Steering Committee member, including hosting an event.
- Several internal awareness sessions for employees on modern slavery topics, including insights on sustainable chocolate and The Chocolate Scorecard (a study led by Be Slavery Free).
- Discussions with investor groups on sustainability, human rights and modern slavery, including responding to investor queries and questionnaires.

Visit our website to provide any feedback



Appendix

FY26 Group structure

Entity	Unique company identifier	Description
Sandfire Resources Limited	105 154 185	Australian ASX listed ultimate parent company. Reporting entity for the purposes of the *Modern Slavery Act 2018 (Cth)*
Sandfire Resources Botswana Pty Ltd	003 103 544	Holding company of Metal Capital Ltd, Metal Capital Exploration Ltd and MOD Resources (Botswana) Pty Ltd. Reporting entity for the purposes of the *Modern Slavery Act 2018 (Cth)*
Sandfire Spain Holdings Pty Ltd	652 903 181	Australian holding company for European investments. Reporting entity for the purposes of the *Modern Slavery Act 2018 (Cth)*
MOD Resources (Botswana) Pty Ltd	120 820 028	Wholly owned Australian incorporated subsidiary
Sandfire Australia Holdings Pty Ltd	649 757 111	Wholly owned Australian incorporated subsidiary
Sandfire Australia Investments Pty Ltd	693 486 556	Wholly owned Australian incorporated subsidiary
Sandfire Australia Pty Ltd	649 757 102	Wholly owned Australian incorporated subsidiary
Sandfire BC Holdings (Australia) Pty Ltd	601 379 846	Wholly owned Australian incorporated subsidiary
Sandfire Management Services Pty Ltd	685 940 096	Wholly owned Australian incorporated subsidiary
Sandfire SA Holdings Pty Ltd	693 497 988	Wholly owned Australian incorporated subsidiary
Sandfire South Australia Pty Ltd	693 498 467	Wholly owned Australian incorporated subsidiary
MOD Resources Botswana (Pty) Ltd	BW00001045522	Wholly owned Botswana incorporated subsidiary
Tshukudu Exploration (Pty) Ltd	BW00000844026	Wholly owned Botswana incorporated subsidiary
Tshukudu Metals Botswana (Pty) Ltd	BW00000844918	Wholly owned Botswana incorporated subsidiary
Sandfire BC Holdings Inc	BC1011861	Wholly owned Canadian incorporated subsidiary
Sandfire Resources America Inc	0001464928	Partly owned Canadian incorporated and TSX listed subsidiary
Sandfire Mineira Portugal, Unipessoal Lda.	515608033	Wholly owned Portugal incorporated subsidiary
El Potroso, S.L.	B21570916	Wholly owned Spain incorporated subsidiary
Minas de Aguas Tenidas, S.A.U.	A81336877	Wholly owned Spain incorporated subsidiary
Sandfire Resources (ES), S.L.U.	B06862510	Wholly owned Spain incorporated subsidiary
Metal Capital Exploration Limited	11417276	Wholly owned UK incorporated subsidiary
Metal Capital Limited	09283833	Wholly owned UK incorporated subsidiary
Sandfire Spain Holdings Limited	13597580	Wholly owned UK incorporated subsidiary
Sandfire Spain UK Limited	13647222	Wholly owned UK incorporated subsidiary
Sandfire UK Finance Limited	15451900	Wholly owned UK incorporated subsidiary
Tintina Montana Inc.	4587889	Delaware incorporated fka Tintina Alaska Exploration Inc. fka Mantra Alaska Exploration Inc.



Glossary of terms

Term	Definition
Cause	Where a company's actions or omissions directly result in the impact occurring.
Complaint	An objection to something, or a statement that something is unsatisfactory or unacceptable related to Sandfire's business activities and/or business relationships.
Contractor	An employee of a company contracted by the employer to do work on its behalf and under its control with respect to location, work practices and application of health and safety standards.
Contribute	Where a company's actions or omissions facilitate or incentivise the impact occurring (often through the demands placed on a third-party).
Directly linked	Where a company's operations, products or services are directly linked to an adverse human rights impact through the activities of a third party, such as a supplier or customer.
Employee	A person directly employed by Sandfire.
Grievance	A concern raised by an individual or group who has experienced or is at risk of experiencing, an adverse human rights impact due to Sandfire's business activities and/or business relationships.
Human rights	Human rights are universal and inalienable rights and freedoms that every person is entitled to regardless of race, sex, nationality, ethnicity, language, religion or any other status. Human rights recognise the inherent value of each person, based on principles of dignity, equality and respect. We are committed to respecting all internationally recognised human rights as set out in the International Bill of Human Rights (comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.
ISM	ISM stands for the International Safety Management Code for the Safe Operation of Ships and for Pollution Prevention. It is an international standard developed by the International Maritime Organization that requires shipping companies and vessels to establish and maintain a Safety Management System.
ISPS	ISPS stands for the International Ship and Port Facility Security Code. It is a mandatory international framework established by the International Maritime Organization to enhance the security of ships and port facilities engaged in international trade.
Local procurement[5]	We consider local procurement at Motheo as national spend and local to the operation. MATSA apply a concentric circle approach prioritising suppliers in the neighbouring communities.
Modern slavery	Modern slavery includes serious human exploitation such as human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.
OECD Due Diligence Guidance for Responsible Business Conduct	Provides practical support to enterprises on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain-language explanations of its due diligence recommendations and associated provisions. Implementing these recommendations can help enterprises avoid and address adverse impacts related to workers, human rights, the environment, bribery, consumers and corporate governance that may be associated with their operations, supply chains, and other business relationships. The Guidance includes additional explanations, tips and illustrative examples of due diligence.
Severe	Most severe is defined in the United Nations Guiding Principles on Business and Human Rights UNGPs as those impacts that would be greatest in terms of: a) Their scale: the gravity of the impact on the human right(s) b) Their scope: the number of individuals that are or could be affected c) Their remediability: the ease with which those impacted could be restored to their prior engagement of right(s).
United Nations Guiding Principles on Business and Human Rights (UNGPs)	The authoritative global standard setting out business' responsibility to respect human rights.
Workforce	All employees and contractors working on any Sandfire Asset.

5 Details available in the FY26 Sustainability Databook.