

## MODERN SLAVERY POLICY

Diatreme Resources Limited ACN 061 267 061 (**'Diatreme, we, us or our'**) recognises the importance of acting ethically and with integrity in our business dealings and relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our business or in any of our global supply chains.

This Policy affirms our commitment to addressing and mitigating modern slavery practices and risks through identifying, preventing and reporting on our practices and any such risks within Diatreme's operations and supply chain.

We encompass strong ESG values and focus on ensuring we remain ethically and socially responsible for our practices. This Policy aims to establish awareness and consideration within Diatreme of modern slavery, in particular fair labour practices, and protecting workers within our operations and supply chains from exploitation.

This Policy supports international treaties, protocols and conventions, such as the United Nations (UN) Sustainable Development Goals and the UN Declaration of Human Rights, along with relevant laws, principles and standards. Diatreme are committed to ensuring continual compliance with all requirements of the Modern Slavery Act 2018 (Cth) (**'Act'**), whilst also considering any relevant global guidelines and standards.

This Policy applies to all persons working for Diatreme or on our behalf in any capacity, including Employees at all levels, directors, officers and Contractors.

We have consulted with the necessary operational areas across Diatreme whilst preparing this Policy.

### MODERN SLAVERY PRACTICES

Modern slavery practices may take several different forms including slavery, servitude, forced and compulsory labour, forced marriage, debt bondage, the worst forms of child labour, deceptive recruiting for labour or services and trafficking in persons. The common feature among each of these is the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Modern slavery within the Act also extends to business conduct which involves exercising control or direction over, providing finance for, or entering a commercial transaction involving slaves or an act of slave trading.

Diatreme strives to conduct its business interactions with integrity and in an ethical, honest and transparent manner, ensuring all Employees, are provided with a healthy, safe and sustainable workplace, as demonstrated by our workplace health and safety policies and procedures. We do not tolerate any instances of modern slavery within the workplace.

Diatreme conducts its own self-assessment of its supply chain to monitor and ensure modern slavery practices do not take place within its supply chains or business.

## **MODERN SLAVERY RISKS**

The main modern slavery risks we face are indirectly through our supply chain relationships, particularly in relation to:

- the lack of supply chain traceability and transparency;
- externally purchased materials (such as equipment and resource extraction), products, services and equipment from countries with a higher modern slavery risk profile; and
- supplies and consumables, including chemicals, oils and solvents used in machinery and operations.

We will continue to take proactive steps to mitigate and address the risk of modern slavery in our supply chains and operations, and we expect all entities we engage with to also implement such measures.

## **OBJECTIVES AND OPERATIONS**

Our corporate governance oversees our commitment to ensuring our Employees, Contractors, customers and suppliers not only understand modern slavery risks, but take action to minimise modern slavery risks.

We have a range of existing Diatreme policies and procedures we have implemented which assist in addressing modern slavery risks. Such policies and procedures include our Code of Conduct which outlines our expectations around Employee, Contractor and directors' standards and behaviour, our Whistleblower Policy and other relevant policies and procedures.

Diatreme conducts a self-assessment of modern slavery risks within supply chains. A supply chain register ensures the evaluation of all risks.

## **COMMUNICATION, ENGAGEMENT AND TRAINING**

This Policy will be published on the Company's website, on Employment Hero and provided to all suppliers and Contractors upon request.

We will provide focussed training sessions to key personnel on modern slavery practices and this Policy. This will include training on how to identify and report on modern slavery practices and the particular parts of our business and supply chains which are subject to a greater risk of modern slavery practices. This training will also form part of the onboarding process for relevant individuals, whether as a new Employee or a new Contractor.

Our commitment to addressing the issue of modern slavery in our business and supply chains will be communicated to all suppliers, Contractors and business partners at the outset of any business relationship and reinforced as appropriate on an ongoing basis.

## **COMPLIANCE AND REPORTING**

Employees and Contractors must read, understand and comply with this Policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees and Contractors must avoid any activity that might lead to, or suggest, a breach of this Policy.

Employees and Contractors must notify Alastair Bauer (General Manager - Development Projects), as soon as possible if they believe or suspect that:

- a conflict with, or breach of, this Policy has occurred, or may occur in the future; or

- there is modern slavery in any part of our business or supply chains of any supplier tier.

If Employees and Contractors are unsure if a particular action, the treatment of workers more generally or their working conditions within Diatreme's operations (including any tier of our supply chains) constitutes any of the various forms of modern slavery, you should raise it with Lauren Phelps (People and Development Coordinator)

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an Employee or Contractor believes that they have been treated in this manner, they should raise their concerns in accordance with our Whistleblower Policy.

In the event of an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.

## **RESPONSIBILITY FOR THE POLICY**

The Board constitutes our principal governing body and has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under their control comply with it. The Board is also responsible for approving any annual Modern Slavery Statement and ensuring it complies with our disclosure obligations under the Act.

Lauren Phelps (People and Development Coordinator) has primary and day-to-day responsibility for implementing this Policy and dealing with any queries about it.

Alastair Bauer (General Manager - Development Projects) is responsible for monitoring the use and effectiveness of this Policy, with responsibilities extending to:

- monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations;
- monitoring and consulting with our suppliers, Contractors and business partners to identify risks of modern slavery practices in our supply chains;
- developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations; and
- monitoring the effectiveness of those measures.

Management at all levels are responsible for ensuring those reporting to them:

- understand and comply with this Policy; and
- are issued with the Policy to understand modern slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.

We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our operations and supply chain. We therefore encourage and seek feedback, comments, suggestions and queries in relation to this Policy, which should be addressed to Lauren Phelps (People and Development Coordinator).

If you require any further guidance regarding this Policy, please contact Lauren Phelps (People and Development Coordinator).

## **BREACHES OF THIS POLICY**

Any Employee or Contractor who breaches this Policy may face disciplinary action, including the termination of the Employee's employment or Contractor's contract. The particular circumstances will dictate the remedial action that we take.

We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy. In all circumstances, at first instance, we endeavour to engage in remedial action and processes with other individuals and organisations before resorting to termination.



**Neil McIntyre**

**Chief Executive Officer**

Diatreme Resources Limited

Issued: April 2025

Review Date: April 2026