

2025 MODERN SLAVERY STATEMENT



ILUKA

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ABOUT THIS STATEMENT

This Modern Slavery Statement is made in accordance with section 14 of the *Australian Modern Slavery Act 2018* (Cth) (MSA) for the period 1 January 2025 to 31 December 2025 (the reporting period).

This Modern Slavery Statement is a joint statement issued by and on behalf of the following entities, which have been determined as reporting entities under the MSA for the reporting period:

- Iluka Resources Limited (Iluka) (ACN 008 675 018), the Group's parent company
- Iluka Midwest Limited (ACN 088 763 666), which holds material parts of Iluka's Mid West Western Australian operations and the Iluka Group's US operations.

It describes steps taken by the reporting entities and entities owned or controlled by those entities to mitigate the risk of modern slavery in the entities' operations and supply chain.

This is Iluka's fifth Modern Slavery Statement made under the MSA.

In this Statement, the collective expressions "we", "us", "our", "ourselves", "the company", "the Group", "Iluka" and "the Iluka Group" are used where reference is made, in general, to the reporting entities and their respective subsidiaries. The use of those terms is for convenience only and used where no useful purpose is served by identifying any particular company or companies, and is not intended to convey how the Iluka Group is structured, managed or controlled. Iluka produces group-wide policies and procedures to ensure uniform practices across the Iluka Group. Certain Iluka Group operating subsidiaries have independent policies, procedures and management teams.

Unless stated otherwise, all data presented relates to the 2025 calendar year and parameters are reported for Iluka and Iluka Midwest Limited reporting entities.

Currency is expressed in Australian dollars (AUD) unless otherwise stated.

MANAGING DIRECTOR'S APPROVAL

This Modern Slavery Statement was endorsed by Iluka's Executive and approved by the Board of Iluka Resources Limited on 24 June 2026 on behalf of the reporting entities.



Tom O'Leary

Managing Director of Iluka Resources Limited

24 June 2026

This Statement has been prepared to meet the mandatory reporting criteria in the *Australian Modern Slavery Act 2018* (Cth). The table below identifies where each criterion is addressed in this Statement.

Mandatory reporting criteria	Location of Iluka's response in this Statement
Criterion 1 Identify the reporting entity covered by the Modern Slavery Statement	About this Statement, page 3
Criterion 2 Describe the structure, operations and supply chain of the reporting entity	Our structure, operations and supply chain, page 7
Criterion 3 Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities the reporting entity owns or controls	Risks of modern slavery in our operations and supply chain, page 12
Criterion 4 Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address the risks, including due diligence and remediation processes	Our actions to address modern slavery risks, page 14
Criterion 5 Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing our effectiveness of our actions, page 15
Criterion 6 Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation with owned and controlled entities, page 16
Criterion 7 Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Appendix: Iluka's key policies, standards and procedures, page 17

APPROACH TO HUMAN RIGHTS AND MODERN SLAVERY

HUMAN RIGHTS COMMITMENT

Iluka is committed to upholding human rights across its operations and supply chain, and to ensuring that all individuals are treated with dignity and respect.

Iluka's approach to human rights is guided by its Code of Conduct and Human Rights Policy and is embedded across key frameworks including the People Policy, Indigenous Peoples Policy, and Health, Safety, Environment and Community Policy. Through these policies, Iluka seeks to align its business practices with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Iluka does not tolerate any form of slavery, forced labour or child labour, and takes steps to prevent such practices from occurring within its operations or supply chain.

Iluka has a diverse supply chain that spans multiple sectors and jurisdictions. The company is committed to working collaboratively with suppliers and other stakeholders, including communities connected to its operations, to identify, assess and address supply chain risks and to support the prevention and eradication of modern slavery.

APPROACH TO MANAGING MODERN SLAVERY RISK

Iluka's approach is centred on three areas:

- **Governance:** Iluka recognises that strong governance underpins effective business and human rights outcomes. This is reflected in policies and processes that are clear, accessible and supported by measurable outcomes. These arrangements promote accountability and transparency in employee conduct. Where gaps or inconsistencies are identified, Iluka addresses them through a structured and systematic approach.
- **Assessing our risk:** Iluka assesses risk across multiple levels to identify potential areas of exposure and respond appropriately. To support a robust understanding of risk, the company undertakes assessments of its direct workforce and employment practices, as well as its suppliers.
- **Action:** Iluka's actions to address and mitigate modern slavery risks are designed to align its business practices with the United Nations Guiding Principles on Business and Human Rights. These actions have been endorsed by Iluka's Executive and the Board of Iluka Resources Limited.



GOVERNANCE FRAMEWORK

Iluka’s governance framework supports the ongoing identification, assessment and management of modern slavery risks. It provides the foundation for implementing controls and actions to prevent and respond to potential modern slavery incidents.

Iluka maintains a suite of policies, standards, procedures and processes that outline the company’s commitments and expectations in relation to respecting human rights, including modern slavery. These documents are detailed in the Appendix on page 17.

ILUKA'S GOVERNANCE FRAMEWORK TO ASSESS AND ADDRESS MODERN SLAVERY RISKS



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

ABOUT ILUKA RESOURCES

Iluka Resources Limited (Iluka or the Company) is a global critical minerals company with capabilities spanning exploration, project development, mining, processing, marketing and rehabilitation.

The Company's objective is to deliver sustainable value.

With more than 70 years of industry experience, Iluka is a leading producer of zircon and high-grade titanium feedstocks, including rutile and synthetic rutile. Through the development of Australia's first fully integrated rare earths refinery at Eneabba in Western Australia, Iluka is positioned to become a globally significant supplier of separated rare earth oxides.

Iluka's products are used across a broad range of applications, including technology, construction, medical, lifestyle, defence and industrial sectors.

As the global economy transitions toward a more sustainable future, demand for Iluka's high-quality Australian critical minerals continues to grow.

In addition to its Australian production base and development pipeline, Iluka operates a globally integrated marketing network. The Company conducts exploration activities both within Australia and internationally and is actively engaged

in the rehabilitation of legacy sites in the United States and Australia. Headquartered in Perth, Western Australia, Iluka is listed on the Australian Securities Exchange (ASX). Iluka holds a 20% stake in Deterra Royalties, the largest ASX-listed resources-focused royalty company.

The company and its subsidiaries employed more than 1000 people during the reporting period, with the majority of employees based in Australia. Iluka's business is supported by a contractor workforce of approximately 270 people.

Iluka Resources Limited is the Group's parent company. Its owned and controlled entities, including the other reporting entity listed on page 3, include those that hold operating mines and processing facilities, development projects, and exploration sites and provide various services to the Group globally.

Read more about Iluka's assets, owned and controlled entities, and investments in Iluka's 2025 Annual Report and at www.iluka.com.



PRODUCTS

ZIRCON - Zr

Iluka is one of the world's largest producers of zircon. From premium-grade zircon to zircon-in-concentrate, Iluka delivers quality products to a wide range of customers around the world utilising its well-developed logistics and distribution capabilities. Applications for Iluka's zircon include ceramics, refractory and foundry, and zirconium chemicals.

Zircon is a high-performing whitener, stable and non-reactive at high temperatures, and resistant to chemical attack, abrasion and corrosion. Zircon's key derivatives such as zirconia materials are highly resistant to thermal shock, highly biocompatible, extremely hard, and provide differentiated functional properties to many applications.

TITANIUM DIOXIDE - TiO₂

Iluka is a leading producer of synthetic rutile, an upgraded, value-added form of the mineral ilmenite. The company also produces natural rutile. Collectively, these products are referred to as high-grade titanium dioxide feedstocks, due to their high titanium content. Primary uses are in the manufacturing of pigment for paints, titanium metal and welding.

Titanium and titanium dioxide are favoured for their high strength to weight ratio, high melting point, corrosion and chemical resistance, high refractive index, biocompatibility, and UV blocking abilities (absorption and reflection).

RARE EARTHS - Nd, Pr, Dy, Tb

Iluka has established a significant position in rare earths elements. Rare earths are essential inputs to defence systems, electric and hybrid vehicles, robotics, renewable energy, and consumer, industrial and agricultural applications. The strong outlook for these applications is expected to drive growing market demand for Iluka's rare earth oxides, particularly neodymium, praseodymium, dysprosium and terbium. Global rare earth production is highly concentrated, which creates inherent risks. Iluka's Eneabba refinery in Western Australia is an important step in increasing the resilience of global rare earths supply chains.

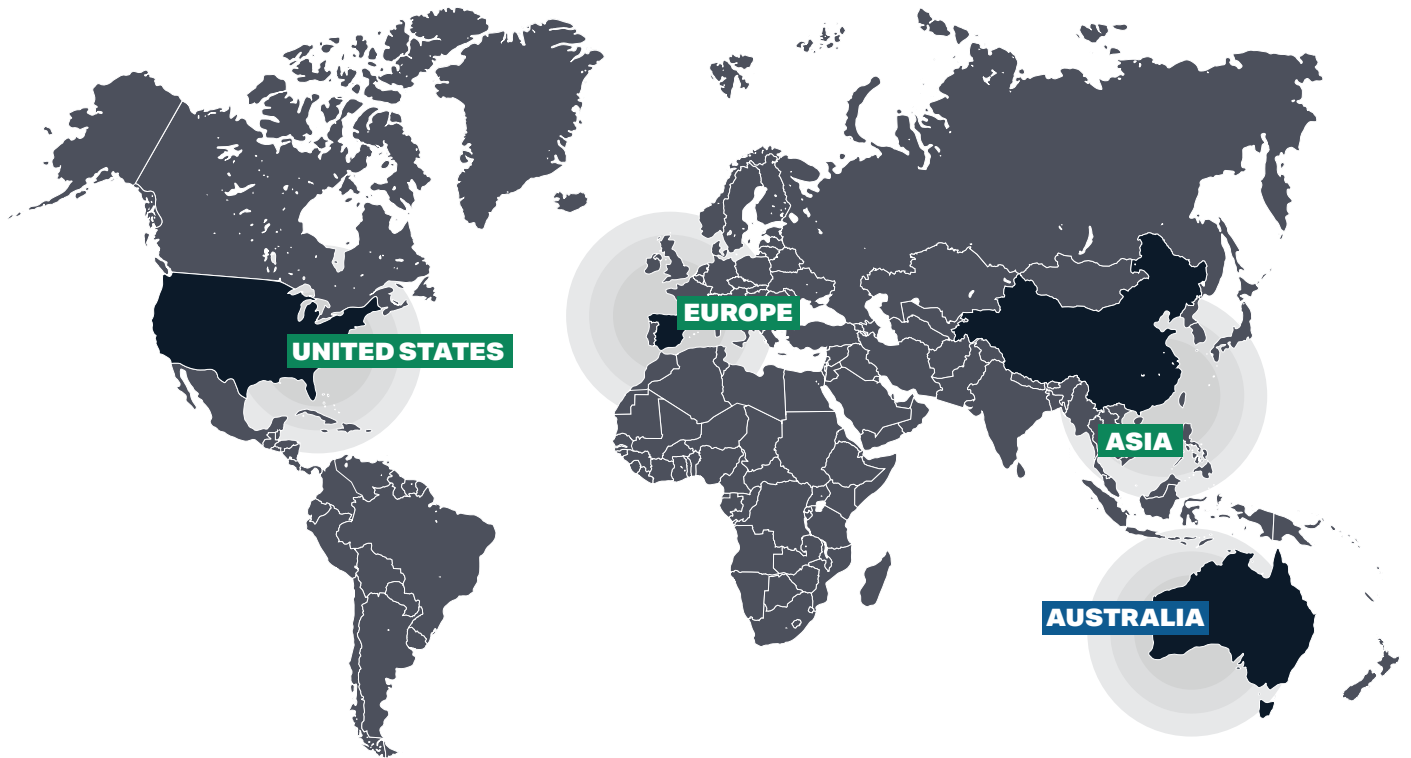
OTHER

Iluka recovers and markets products produced as part of its processing activities, including activated carbon, gypsum and iron concentrate.



OUR LOCATIONS

Iluka's production is located exclusively in Australia. The company has a global marketing network and is conducting rehabilitation activities in Australia and at former mine sites in the United States.



AUSTRALIA

WESTERN AUSTRALIA

- Narngulu processing
- Cataby mining and concentrating
- Capel synthetic rutile processing
- Corporate support centre
- Rehabilitation

SOUTH AUSTRALIA

- Jacinth-Ambrosia mining and concentrating
- Jacinth-Ambrosia satellite deposits
- Rehabilitation
- Corporate support centre

NEW SOUTH WALES

- Balranald project

VICTORIA

- Wimmera project
- Hamilton processing (idle)
- Rehabilitation

GLOBAL

UNITED STATES

- Marketing and distribution
- Rehabilitation

EUROPE

- Marketing and distribution

ASIA

- Marketing and distribution

OUR SUPPLY CHAIN

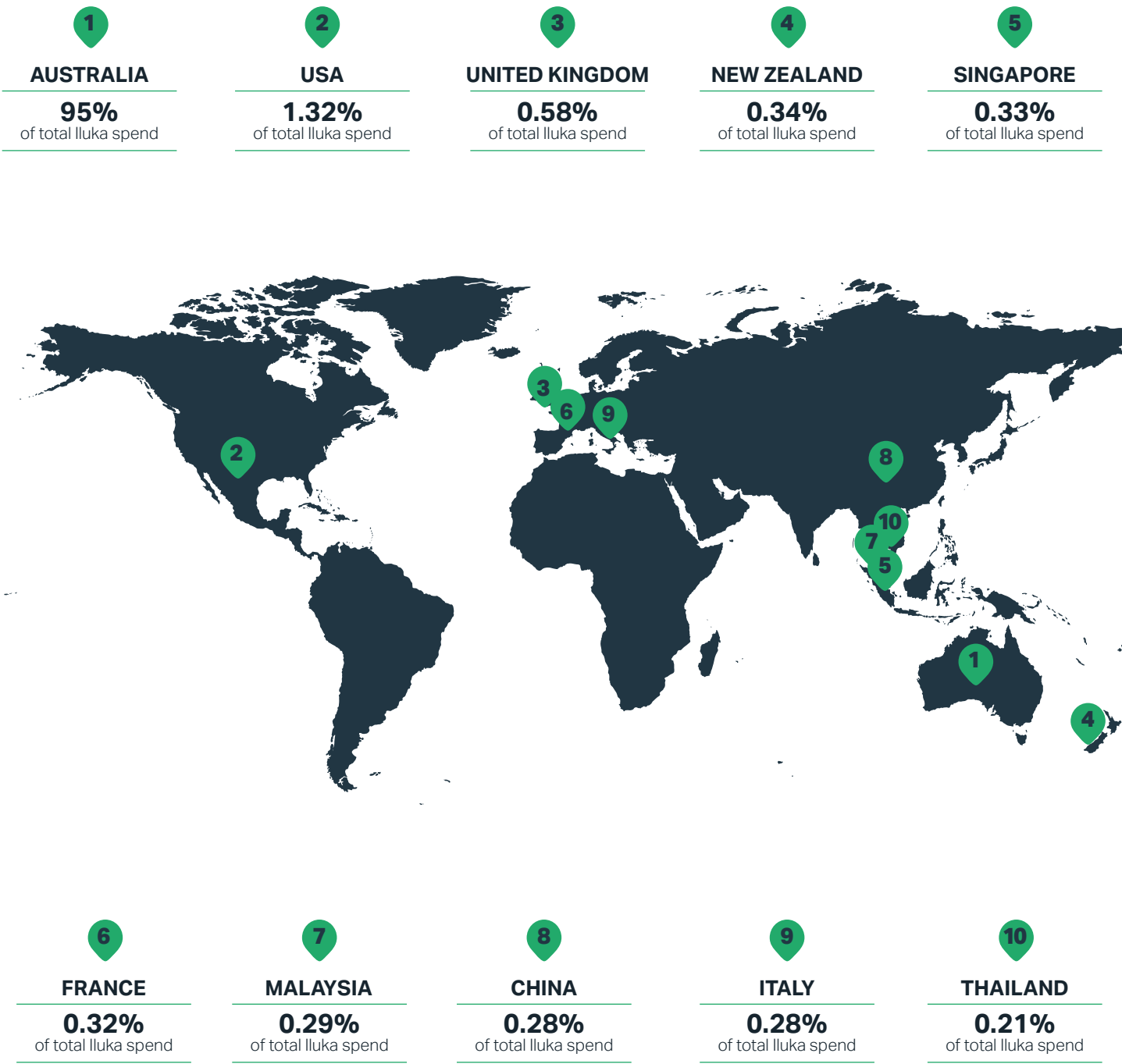
In 2025, the total invoiced spend was \$1,584,145,495. Iluka's supply chain spans 33 countries, with approximately 95% of the company's spend local to our operations in Australia.

Iluka procures a wide range of goods and services across multiple sectors to support its exploration, project development, research and analysis, mining, processing, marketing and logistics, rehabilitation and closure, and corporate support activities.

Procurement is managed through a centralised function based at Iluka's Perth corporate office. This function is responsible for procurement governance and for managing strategically important, high-risk or complex categories in accordance with Iluka's Procurement Standard.



2025 TOP 10 ILUKA SUPPLIER COUNTRIES BY TOTAL ILUKA SPEND



ASSESSING RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

ASSESSING RISK IN ILUKA'S OPERATIONS

Iluka recognises that its operations and supply chain could potentially cause, contribute or be directly linked to modern slavery practices. As identified on page 7, Iluka's workforce is predominately based in Australia with 24 employees based in the United States, China and Spain. The Global Slavery Index identifies Australia as a low-risk country for modern slavery, reflecting strong labour laws and enforcement frameworks. As a result, the risk of modern slavery occurring within Iluka's direct operations in Australia is considered low.

The company is supported by a contractor workforce of 270 people. Iluka recognises that contractor workforces may be exposed to a higher inherent risk of modern slavery-type practices. In particular, third-party contractors that engage recruitment agencies or labour brokers can present elevated modern slavery risks. Iluka seeks to manage these risks through its supplier due diligence and procurement processes, as outlined below.

In accordance with the Iluka Health, Safety, Environment and Community Management System, the reporting and classification of hazards and incidents are governed by a Group guideline. This guideline includes examples of modern slavery incidents that require internal reporting, supporting visibility and appropriate escalation of any modern slavery occurrences that may be identified in connection with Iluka's business.

ASSESSING RISK IN ILUKA'S SUPPLY CHAIN

Iluka's 2025 modern slavery supply chain risk analysis was undertaken internally and is based on two primary criteria: the country of origin of goods, and the category of commodity or service provided. Each criterion captures a distinct element of supplier risk, which are then combined to determine an overall risk rating.

The evaluation of supplier data to identify modern slavery indicators utilised externally-developed tools and indices including:

- Walk Free Global Slavery Index (GSI)
- US Department of Labour List of Goods Produced by Child Labour or Forced Labour

In 2025, the supply chain risk assessment indicates a predominantly low risk profile, with 99.5% of goods and services procured from countries with a low or medium risk score.

Iluka's purchasing included suppliers from two high-risk countries representing approximately 0.002% of total spend. These high-risk countries are South Africa and India, where the main goods and services procured were professional and contracted services, and bulk and general freight and cartage services.

Three countries within Iluka's supply chain—China, Thailand and Indonesia—fall outside the defined Global Slavery Index (GSI) thresholds for low (≤ 40) or high (≥ 50) risk. Collectively, these countries account for approximately 0.5% of total invoiced spend in 2025.

2025 TOP 10 HIGH-RISK CATEGORIES

High-risk category	Iluka purchasing material groups
Employment services	Apprentice labour Labour hire - admin, corporate and office support Labour hire - electrician and other electrical trades Labour hire - IT roles and functions Labour hire - mechanical trades Labour hire - operators, production support Labour hire - other functions Labour hire - security and medical personnel Supplementary labour
Textile, clothing and footwear wholesaling	Uniforms and clothing Helmets, visors, gloves, glasses
Grocery, liquor and tobacco product wholesaling	Coffee, tea, paper cups, water, hydrolytes, food Field rations and food
Electrical equipment manufacturing	Cable and conduit, saddles, joins, adaptors Coils, bushing, connectors Fuses, circuits, terminals, switches, plugs, sockets Isolation, lockout, tape, respirator, Modules, PLCs Transformers Tubes, fittings
Building cleaning, pest control and gardening services	Building maintenance, gardening, cleaning, camp management
Timber and hardware goods wholesaling	Construction and building materials
Other transport support services	Bulk freight and cartage General freight and cartage services
Fuel retailing	Coal Fuel-diesel Fuel-ULP Marine fuel oil
Telecommunications services	Communications - mobile Communications - other Communications - telephone Communications - video conferencing facilities Computer network charge
Pharmaceutical and toiletry goods wholesaling	Soaps, paper towels, toilet paper

ACTIONS TO ADDRESS MODERN SLAVERY RISKS

APPROACH TO DUE DILIGENCE

Iluka expects all new and existing suppliers to meet or exceed the minimum standards set out in its policies and Code of Conduct. Suppliers are expected to develop and implement policies aligned with Iluka's policies and Code, and to encourage similar standards across their own supply chains. Iluka's procurement contracts require suppliers to comply with these policies and guidelines.

Iluka seeks to identify and address potential human rights risks associated with its activities, including instances of modern slavery within its supply chain. Human rights due diligence is embedded within Iluka's procurement processes, including enhanced supplier selection and screening procedures. This includes:

- Daily screening of the entire existing supplier database using a Dow Jones Risk Centre screening tool using data from Iluka's procurement system
- The requirement for all international suppliers to complete a modern slavery questionnaire, in addition to any national suppliers identified as potential high-risk
- For-cause supplier assessment conducted upon receipt of credible information justifying accelerated assessment

When procuring from suppliers located in higher-risk countries, Iluka applies the due diligence measures outlined above and, in most cases, has also established long-standing supplier relationships supported by regular engagement and familiarity with supplier operation.

REMEDiation OF NON-CONFORMANCES

In 2024, Iluka developed and implemented the Iluka Modern Slavery Remediation Procedure. This Procedure is aligned with the Iluka Human Rights Policy and seeks to ensure consistent, effective and timely remediation of any modern slavery incidents that may arise.

Where a modern slavery incident is identified, Iluka will take steps to mitigate and address the issue in accordance with its values, policies and standards, and through the application of its internal incident management systems, including the modern slavery remediation protocol. Actions taken may include:

- Cessation of the action causing the harm
- Use of leverage to mitigate any harm
- Remediation for those who have been impacted

GRIEVANCE AND WHISTLEBLOWER MECHANISMS

Iluka's Social Performance Standard sets out the process for identifying social impacts that may be caused or contributed to by its operations. In line with Iluka's Grievance Management Procedure, all Iluka sites are required to maintain a locally appropriate grievance mechanism that seeks to align with the United Nations Guiding Principles on Business and Human Rights.

Iluka's Whistleblower Policy outlines the avenues available for employees, suppliers, contractors and members of the public to report concerns relating to actual or suspected misconduct. Reports can be made through STOPline, an external and independent whistleblower service.

TRAINING AND CAPACITY BUILDING

All employees who hold relevant roles within the business gain awareness of human rights implications for the company by completing Iluka's mandatory human rights and modern slavery training module.

ENGAGEMENT AND COLLABORATION

Iluka recognises the value and advantages of a collaborative effort in addressing common modern slavery risks.

Iluka actively participates in the Australia-based Human Rights Resource and Energy Collaborative, which provides a forum for organisations across the resources and energy sectors to connect and share knowledge on respecting human rights, including implementation of the *Modern Slavery Act*. Throughout 2025, Iluka continued its engagement with the Human Rights Resource and Energy Collaborative.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

REVIEWS AND AUDITS

A third-party review of Iluka's management of modern slavery risks within its workforce was completed in 2022. The review found that Iluka had adequately defined and managed modern slavery risk within its Australian workforce. The report also highlighted the opportunity to continue to provide capability building for both internal and external stakeholders where appropriate.

HUMAN RIGHTS AND MODERN SLAVERY TRAINING

Iluka tracks the completion rate for internal mandatory human rights and modern slavery awareness training. In 2025, the completion rate for internal mandatory modern slavery training was approximately 84%.

GRIEVANCE AND WHISTLEBLOWER MECHANISMS

Iluka monitors and reviews complaints raised in accordance with its Whistleblower Policy and locally-appropriate grievance mechanisms. In 2025, there were no grievances raised via the whistleblower service or other reporting avenues in relation to modern slavery.



CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Reporting entities covered by this Statement all share the same Company Secretary, who was consulted in developing the Statement, including reviewing a draft version of the Statement. Consultation was also undertaken with owned and controlled entities through engagement at Company Secretary level.

The development of this Statement was led by members of Iluka's cross-functional Modern Slavery Steering Committee. Inputs were provided by the Communities, Sustainability, Procurement, Legal, Risk and People functions.

In finalising this Statement, Iluka's Executive Sustainability Committee has reviewed and endorsed the draft. The Board of Iluka Resources Limited, the parent entity of the Group, has approved this Statement, and a responsible member of Iluka has signed this Statement on behalf of Iluka and Iluka Midwest Limited. Refer to the Managing Director's approval on page 3.



APPENDICES

APPENDIX 1 – ILUKA'S KEY POLICIES, STANDARDS AND PROCEDURES

The following table lists key policies, standards and procedures that set out Iluka's commitments and expectations in relation to respecting human rights, including modern slavery. These apply across the Group.

Policy, standard or procedure
Code of Conduct*
Supplier Code of Conduct*
Anti-Bribery and Corruption Policy*
Diversity and Inclusion Policy*
Health, Safety, Environment and Community Policy*
Human Rights Policy*
Indigenous Peoples Policy*
People Policy*
Procurement Policy*
Risk Management Policy*
Whistleblower Policy*
Social Performance Standard
Training and Awareness Standard
Procurement Standard
Hazard, Incident Emergency Classification Guideline
Equal Employment Opportunity, Bullying and Harassment Procedure
Flexible Work Arrangements Procedure
Grievance Procedure
Recruitment Procedure
Social Performance Procedure
Iluka's Risk Appetite Statement
External independent whistleblower service STOPline
Iluka Resources Online Reporting Externally Managed Disclosure Portal (stoplinereport.com)

*Available at www.iluka.com



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