KSN KINGSTON RESOURCES LIMITED

Modern Slavery Policy

1. Introduction

At Kingston Resources, we have a zero-tolerance approach to modern slavery and we are fully committed to conducting business ethically and responsibly. We oppose all forms of modern slavery that deprives a person of their freedom. We are committed to identifying, preventing, and addressing modern slavery risks in our operations and supply chains.

2. Scope

This policy applies to all employees, contractors and suppliers of Kingston Resources, and its subsidiaries including, Mineral Hill Pty Ltd.

3. Purpose

This Policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. It is consistent with our ethical framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery and the Australian Modern Slavery Act 2018[1].

4. Definitions

Modern slavery for the purposes of this policy is defined by the Australian Modern Slavery Act 2018 to include eight types of serious exploitation which can be understood as:

1. **Trafficking in persons** - the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs
2. **Slavery** - the offender exercises powers of ownership over the victim
3. **Servitude -** the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work
4. **Forced labour** - the victim is either not free to stop working or not free to leave their place of work
5. **Forced marriage** - coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony
6. **Debt bondage** - the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined
7. **Child labour** - involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs
8. **Deceptive recruiting for labour or services -** the victim is deceived about whether they will be exploited through a type of modern slavery

It can also extend to:

- entering into a commercial transaction involving a slave
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it)

[1] Modern Slavery Act (Cth) 2018. Available from: https://www.legislation.gov.au/Details/C2018A00153

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Indicators of modern slavery include:

- Individuals not being paid for the work they undertake
- Individuals being held in debt-bondage (being told they "still" owe money after having paid off a previous debt)
- An individual's passport being held by their "employer" in order to keep the individual at work
- Multiple benefit claimants having their benefits being paid into the same account
- An individual not having freedom of movement (i.e. Passport being taken)
- Clear exploitation of an individual by another for financial or sexual gain

Suppliers is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

Supply chains is defined as the products and services (including labour) that contribute to our own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

5. Commitment

We are committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as continued in the definition of Modern Slavery in any part of our organisation or in our supply chain.

We welcome transparency and this Policy sets out for the public, our stakeholders, suppliers and employees the approach we are taking in this regard.

6. Approach

We will work proactively to reduce modern slavery within our supply chains and operations and expect all organisations we engage with to do the same.

Recruitment

All employees are provided with a written contract of employment setting out the terms and conditions of employment, including remuneration, working hours, leave and other benefits. Our employment contracts comply with applicable local laws.

All new employees are provided with copies of Kingston's key governance policies (including Code of Conduct (Code), Anti-Bribery and Corruption Policy, Disclosure Policy, Diversity Policy, Securities Trading Policy and Whistleblower Policy) and are expected to read and familiarise themselves with the Code and Policies. The Code and Policies are also available on the Company's internet site.

Operations

We maintain a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on the approach we take to work with suppliers to reduce risks and the range of supports available for when we or a supplier becomes aware that someone is at risk of or affected by modern slavery practices.

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

Risk Areas

As a mining company, we recognise potential risks in labour hire arrangements, subcontracted services, procurement of equipment and materials, and international supply chains.

Our Expectations

All employees and business partners must comply with this policy. Suppliers are expected to maintain labour practices that respect human rights and to provide information when requested. Non-compliance may result in corrective action or termination of engagement.

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Due Diligence

We assess modern slavery risks when engaging new suppliers and periodically review higher-risk relationships. Relevant staff receive guidance on identifying and responding to potential risks.

Suppliers and Supply Chain

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify us as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

If modern slavery is identified, our priority is the safety and wellbeing of affected individuals. We will work with suppliers to address issues and prevent recurrence. Where remediation is not possible or cooperation is lacking, we may end the business relationship.

7. Responding to Concerns

Reporting unethical or unlawful conduct

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

Concerns about compliance or ethical issues or illegal or unethical activities are to be reported in accordance with our Whistleblower Policy.

Responding to concerns of modern slavery practices

Anyone can report suspected modern slavery through our confidential reporting channels. Reports will be investigated promptly, and individuals raising concerns in good faith will be protected from retaliation.

Our People & Culture team can be contacted for further information, advice and options available when a person is at risk of affected by modern slavery practices via email to info@kingstonresources.com.au

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

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

8. References and Forms

- Modern Slavery Act (Cth) 2018
- Kingston Resources Code of Conduct
- Kingston Resources Whistleblower Policy

9. Control and Revision

Kingston reserves the right to vary, replace or terminate this policy from time to time.

10.1 Document information

Approved By	Mick Wilkes
Document Owner	
Effective Date	

10.2 Revisions

Version	Date Reviewed	Review team (consultation)	Nature of amendment
2026.03.26	26/03/2026	Sustainability Committee	New draft policy reviewed as first-cut
2026.03.26	21/05/2026	Board	Approved by Board

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