



# Modern Slavery Voluntary Statement



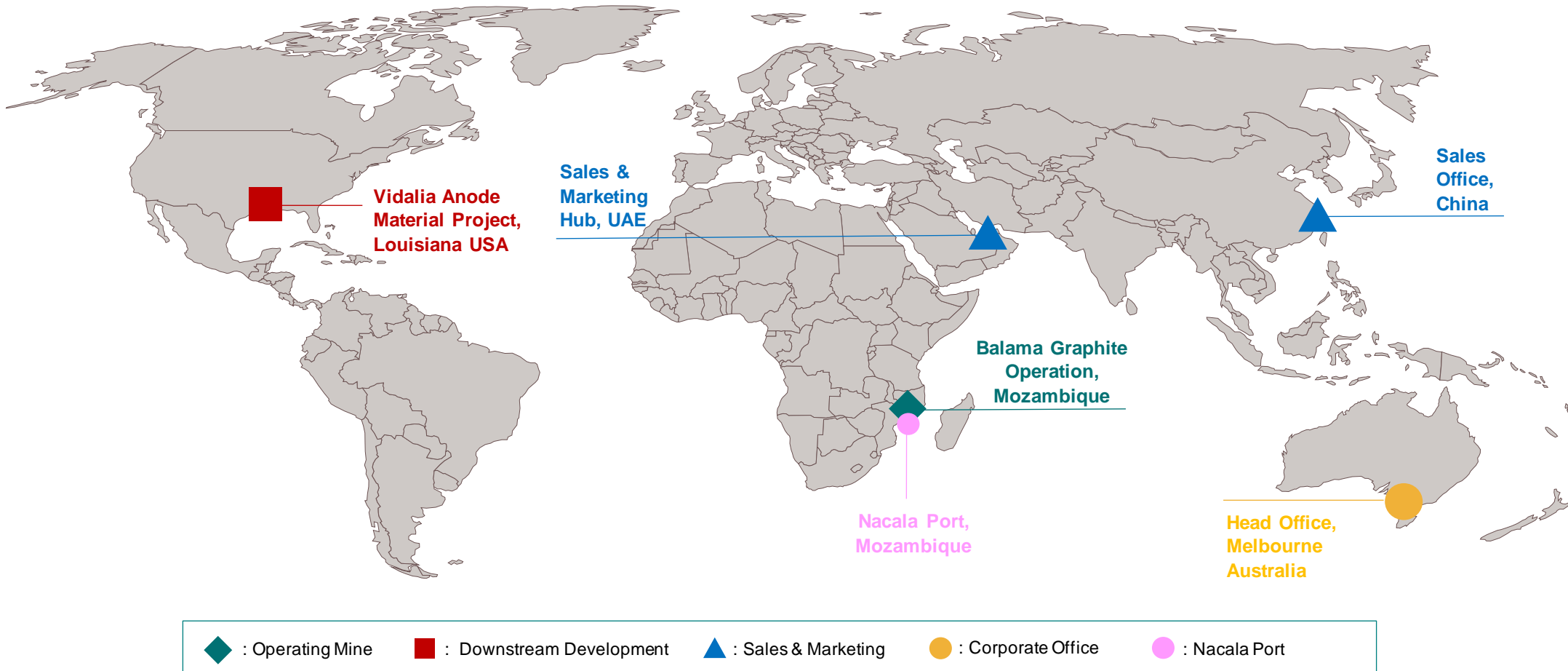
**SYRAH** RESOURCES

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## 1. SYRAH RESOURCES – GEOGRAPHICAL SNAPSHOT



## 2. INTRODUCTION

Syrah Resources (“Syrah” or “the Company”) is an Australian Stock Exchange listed industrial minerals and technology company with its flagship Balama Graphite Operation (“Balama”) in Mozambique and a downstream Active Anode Material Project in the United States. Syrah’s vision is to be the world’s leading supplier of superior quality graphite products, working closely with customers and the supply chain to add value in battery and industrial markets.

Balama is a high grade, long life asset (>50 years) and is the largest integrated natural graphite mine and processing plant globally. Balama is positioned to become vertically integrated with Syrah’s downstream processing plant in Vidalia, Louisiana producing Active Anode Material (“AAM”). A recent Bankable Feasibility Study undertaken confirms robust economics for anode production in the USA and Syrah remains on track to become the first vertically integrated producer of AAM outside of China.

Syrah’s head office is located in Australia and its Sales & Marketing division is based in the United Arab Emirates, with a sales liaison office in China. Although geographically dispersed, we operate under a single governance framework and are guided by strong organisational values.

## 3. OUR COMMITMENT

The Company recognises that, due to the geographical spread of its operations, the inherent nature of business activities, our labour-force structures and prevailing socio-political and environmental conditions, modern slavery risks exist throughout the Company’s supply chain.

Modern slavery risks may include:

- Forced labour
- Violations of minimum wage and working conditions
- Debt bondage
- Child Labour
- Domestic servitude
- Sex trafficking
- Forced marriage

We acknowledge our responsibility, as a responsible and ethical corporate citizen, to proactively identify and mitigate modern slavery risks across the business in collaboration with our employees, contract partners, suppliers, communities and stakeholders. We also recognise that protecting and respecting human rights is fundamental to ethical business performance and maintaining our social license to operate.

By protecting the rights of all people, the Company is best positioned to create long term value for its shareholders and mutual benefit for the communities in which we operate, or impact through the value chain.

Importantly, we also understand that by working collaboratively with governments and institutions we can help strengthen their capacity to eradicate modern slavery and contribute to sustainable development in these regions.

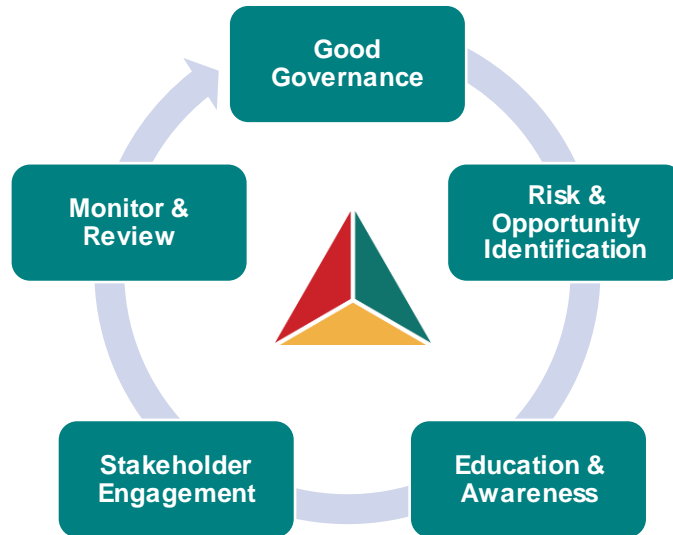
## 4. OUR APPROACH

As a maturing organisation we recognise that opportunities exist to strengthen our industry / corporate partnerships, systems, processes and assurance frameworks to safeguard against modern slavery and to ensure exposures are identified and remedied quickly. For our early stage of

development, we have adopted a simple approach to addressing the eradication of modern slavery which we will continue to strengthen over the coming years.

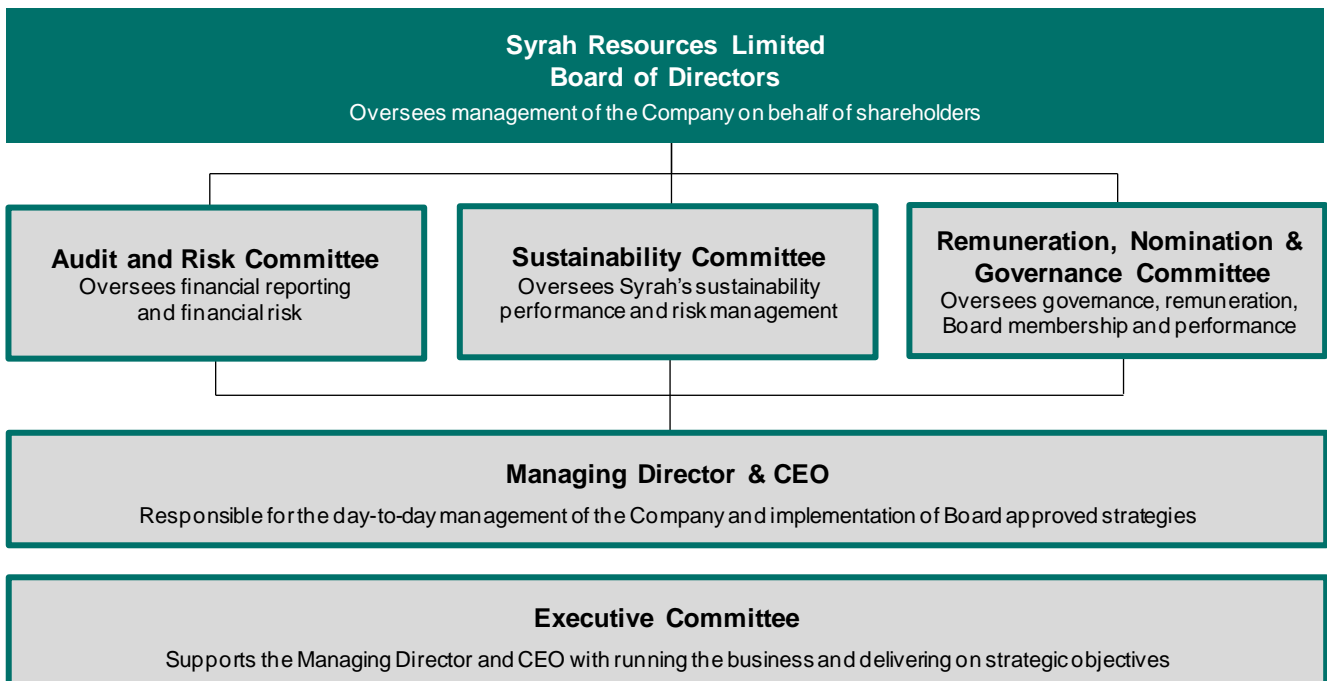
At all times our approach will be guided by international leading practice including the United Nations (UN) Guiding Principles on Business and Human Rights and other relevant domestic and international legislation, standards and guidelines.

Our approach is outlined below:



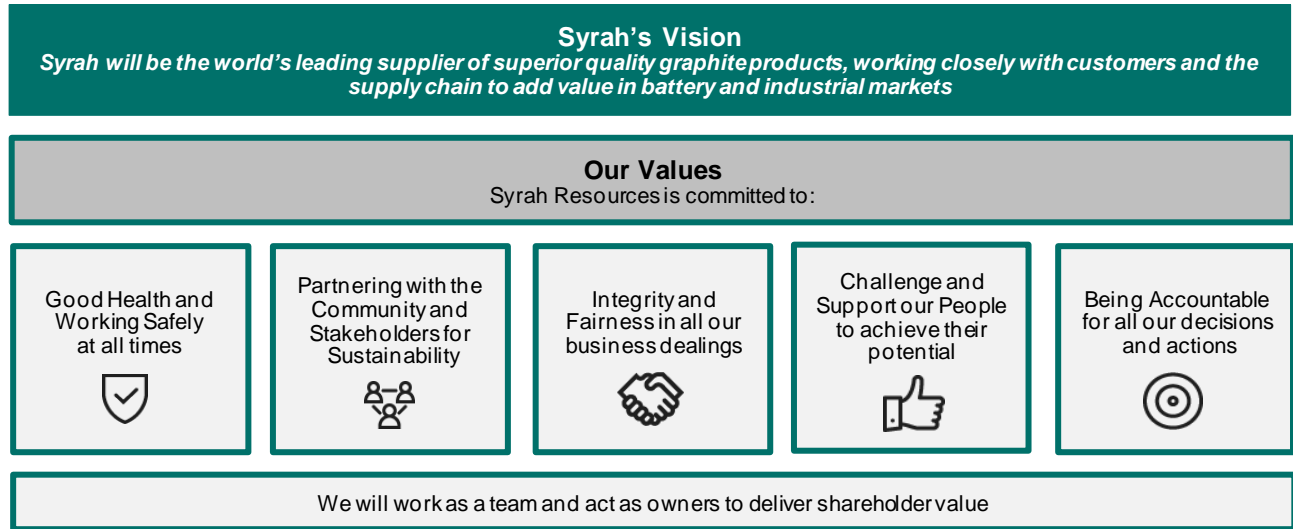
## 5. CORPORATE GOVERNANCE

A robust Corporate Governance Framework has been established at Syrah to ensure the effective oversight of all business activities and decisions. This framework ensures a strong Board and Executive commitment exists for respecting and protecting human rights and lays the foundation of our approach to eradicating modern slavery from our business and supply chain.



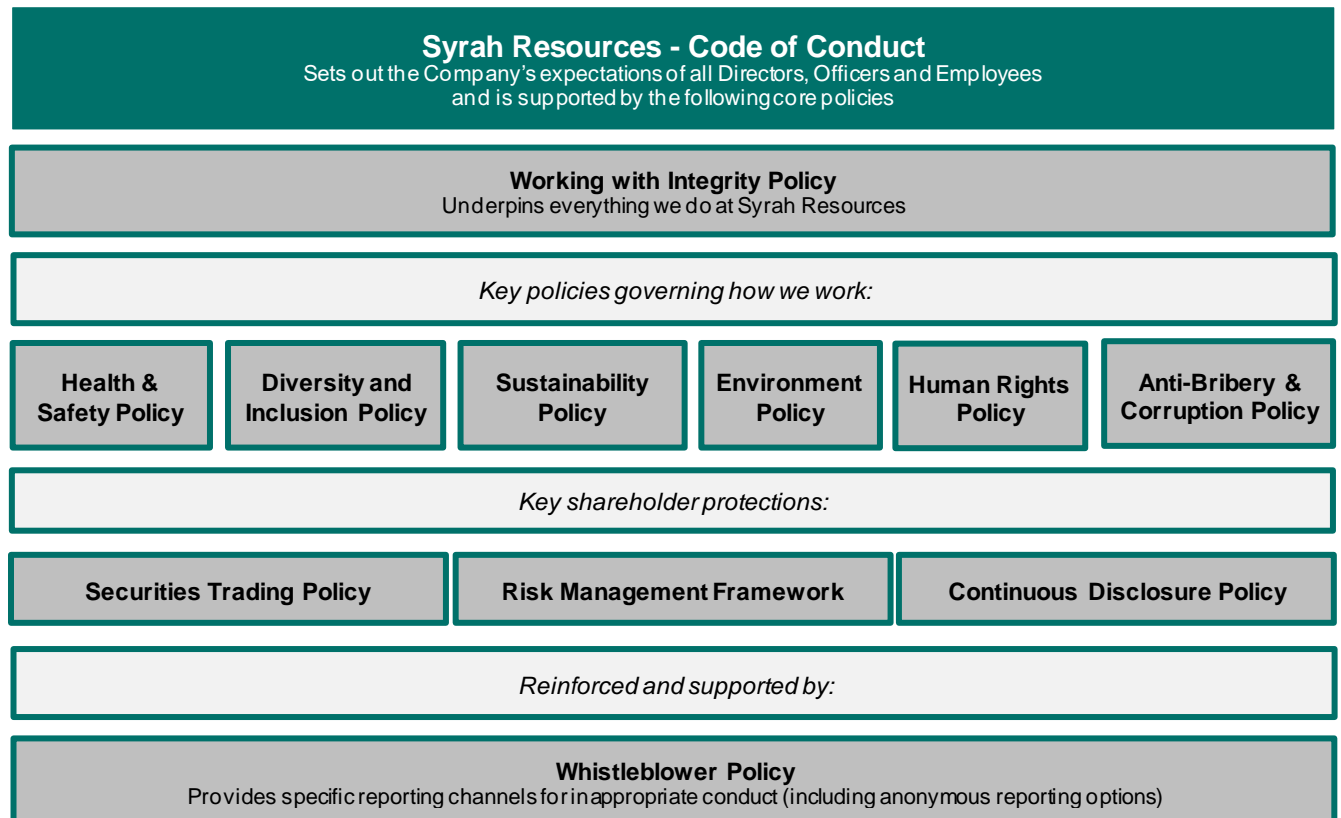
## 6. VISION & VALUES

In pursuit of our Vision, Syrah has established and is driving an organisational culture founded on the Company Values where all employees, contract partners and supply chain participants are treated with fairness and respect and where ethical business practices are maintained at all times. All leaders are accountable for exhibiting behaviours in line with the Company Values and encouraging these behaviours in others.



## 7. KEY POLICIES

The Company Values are underpinned by key policies that set clear expectations in relation to acceptable standards of workplace conduct and ensure ethical business standards are upheld. These policies are reviewed annually, and all employees are trained in their application biennially to drive awareness and compliance. These policies are available on the [Syrah website](#).



Although not listed above, Syrah’s Workplace Behaviour Policy and Community Complaints & Grievance Procedure are key to good governance and eradicating modern slavery at our operations and across the supply chain.

### 8. EFFECTIVE LEADERSHIP

Robust management structures, role descriptions and key performance indicators are in place across the organisation and qualified, experienced personnel have been appointed to all key leadership roles. Our leaders are critical for ensuring human rights are protected and respected throughout all areas of the organisation and the supply chain via the implementation of our Risk Management Framework.

Our leaders are also expected to drive human rights education, awareness and continual improvement initiatives and to ensure all suspected or actual violations are reported, thoroughly investigated and addressed quickly. From FY21, we will train our leaders in the proper management of the human rights performance of their respective areas of influence.

### 9. RISK AND OPPORTUNITY IDENTIFICATION

Syrah follows a systematic approach to risk management which includes a thorough evaluation of both key business risks and our material sustainability issues. Both influence our Corporate Strategy and are integrated into the Company Risk Management Framework which is reviewed regularly by the Syrah Leadership Team, the Executive Committee (ExCo), and the Syrah Board and its Sub-Committees.

Comprehensive risk reviews are conducted at least biannually due to the dynamic nature of our operating environment and to ensure the effectiveness of risk management controls in place. All significant escalations in risk profiles/ratings are reported to the ExCo in line with established reporting protocols.

Human rights compliance represents a material issue for the Company with modern slavery protections considered necessary at all levels of the organisation and throughout the supply chain. By the end of 2021 (and at regular intervals thereafter), we will assess our actual and potential supply chain modern slavery risks in line with select risk factors deemed relevant to our business. These modern slavery supply chain risk factors are outlined below with their intersections representing our greatest modern slavery exposures:



A consideration of **geography** relative to where goods and services are produced / procured is key to protecting human rights and this includes an assessment of contextual indicators such as modern slavery prevalence estimates and government vulnerabilities in the countries in which we operate.

These considerations allow us to better understand the variable risk profiles that exist across the supply chain so we can implement mitigation strategies to reduce our exposures wherever possible.

The below data depicts the prevalence of modern slavery in the countries in which we operate and also where the vast majority of our key suppliers are based (data sourced from the [Global Slavery Index 2018](#)).

Regional Ranking <sup>1</sup>	Country	Estimated prevalence per 1000 population	Estimated absolute number of victims of modern slavery	Government Rating <sup>2</sup>	Population
25 of 28	Australia	0.5	15,000	BBB	23,800,000
36 of 51	Mozambique	5.4	152,000	B	28,011,000
23 of 27	United States of America	1.3	403,000	BBB	319,929,000
21 of 28	China	2.8	3,864,00	CC	1,397,029,000
9 of 11	United Arab Emirates	1.7	15,000	B	9,154,000
17 of 28	Indonesia <sup>3</sup>	4.7	1,220,000	BB	258,162,000
47 of 51	South Africa <sup>3</sup>	2.8	155,000	B	55,291,000

1. *Regional ranking – the lower the score the higher the prevalence of modern slavery.*
2. *AAA = highest rating (comprehensive and effective government response to all forms of modern slavery) and D = lowest rating (government has a wholly inadequate response to modern slavery).*
3. *Indonesia and South Africa included as major geographical suppliers to Syrah Resources (e.g. bags, pallets, equipment and spare parts).*

**Labour and services** are fundamental to supply chain performance. Therefore, as part of our modern slavery risk mitigation strategy we will assess our major suppliers with a particular focus on areas where migrant workers and/or entry-level workers may be directly engaged or employed via third party arrangements. This employment category (often termed ‘cheap labour’) is considered particularly vulnerable to all forms of modern slavery.

Similarly throughout 2021, our major suppliers will be assessed relative to the goods and services they provide to the Company, with close attention given to service categories identified as high-risk by international guidance. High risk service categories relevant to our business include:

- Transport and logistics
- Catering and cleaning
- Construction
- High volume consumables – e.g. oils, reagents, bags, pallets and safety equipment
- Information Technology (IT)
- Security
- Maintenance

**Supplier spend** is considered pertinent to all assessments of modern slavery risks in our supply chain and will be used to guide the supply chain risk assessment process.

**Supplier capability** will also be assessed in FY21 by the Syrah Procurement Lead Team (and at regular intervals thereafter) to better understand the sophistication of supplier management systems, policies, training and governance frameworks to enable them to adequately identify modern slavery risks, demonstrate that effective mitigation measures have been implemented and to confirm they meet Syrah’s human rights and modern slavery standards. Where areas for improvement are identified, Syrah will work collaboratively with its suppliers to adequately address gaps.

Supplier capability will be assessed by a variety of methods including pre-qualification and onboarding assessments, in-field verification audits, self-assessment questionnaires and discussions during contract reviews and as part of the supplier demobilisation process.

#### 4. EDUCATION AND AWARENESS

Human Rights Awareness is a mandatory training competency at Syrah for all employees and suppliers/contractors, and a standalone modern slavery module has been added to the training package and delivered across the organisation. Our mandatory training competencies require biennial refresher training. Syrah will continue to improve the efficacy of our training systems in line with leading practice standards and guidelines, and applicable changes in legislation.

At Balama, our contracted security service providers must observe the UN Voluntary Principles of Security & Human Rights and train their employees in these requirements as a prerequisite to working at our assets. They are subject to this ongoing obligation in contractual arrangements and all contract security personnel are required to complete refresher training biennially. All suppliers are required to comply with Syrah's Code of Conduct, Anti-Bribery and Corruption Policy and other Company policies appropriate to the relationship.

Our supplier onboarding strategy includes raising awareness regarding modern slavery risks and exposures, and we will communicate to all of our suppliers that they have a contractual obligation to commit to eradicating modern slavery in all forms across the supply chain.

We will continue to commemorate Human Rights Day each year in partnership with our key stakeholders to raise awareness and reaffirm that all parties have a responsibility to respect and promote the rights of our people and people within the communities in which we operate.

We will maintain the integrity of our community complaints and grievances mechanisms and whistleblower protections and will strengthen this over time to ensure our communities and other stakeholders are provided an avenue for redress relative to actual or suspected human rights breaches.

#### 5. STAKEHOLDER ENGAGEMENT

We understand our role in raising human rights awareness with our Host Communities and across all levels of Government in the jurisdictions in which we operate, and we are committed to strengthening the capacity of local and national institutions to protect and respect human rights for sustainable development.

A comprehensive Stakeholder Engagement Framework has been established at Syrah with discrete mechanisms in place to ensure key stakeholders remain informed of our activities at each stage of our life-cycle. As we continue to mature, so too will our relationships with key suppliers, governments, non-government organisations, civil societies, Host Communities and various industry bodies.

These networks will allow to us to positively contribute to the eradication of modern slavery across the private sector through improved information sharing, resource allocation and risk mitigation.

#### 6. MONITOR AND REVIEW

We will continue to strengthen our capacity to monitor and review human rights and modern slavery performance across the Company utilising our existing sustainability reporting framework, broadening our risk management approach to include suppliers and the value chain, and through the continual improvement of our procurement and supplier management systems / standards.



Syrah Resources Limited			
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