



# Supplier Code of Conduct Policy

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## 1 INTRODUCTION

CITIC Pacific Mining Management Pty Ltd (CPM) and its Related Bodies Corporate hold the highest standards for all partners engaged in supporting our Sino Iron Project. We are committed to conducting business in an ethical, responsible, and sustainable manner and expect the same high standards from our Suppliers.

For this Policy, "Supplier" refers to any entity providing goods, services, or works to CPM, including but not limited to those previously referenced as Contractors, Service Providers, and Vendors.

This Supplier Code of Conduct Policy outlines the minimum standards and expectations we have for each of our Suppliers. Compliance with this Policy is mandatory for all Suppliers, and adherence to these standards is a prerequisite for conducting business with CPM.

This Policy is designed to uphold CPM's ethical business practices, ensure compliance with relevant legislation, and align with Western Australia's mining industry legislation and regulations.

## 2 OUR OPERATION – SINO IRON

CITIC Pacific Mining (CPM), a wholly owned subsidiary of Hong Kong-listed CITIC Limited, leads one of Australia's most ambitious resources initiatives. From our Perth headquarters, we manage Sino Iron, an integrated mining, processing, and port operation delivering premium magnetite iron ore to Asian steel markets.

Sino Iron stands as Australia's largest magnetite mining and processing operation, strategically located 100km southwest of Karratha in Western Australia's resource-rich Pilbara region. This world-class facility transforms low-grade magnetite into a premium, high-grade iron ore concentrate, representing one of the nation's most significant resource investments and establishing a new frontier in Australia's iron ore export industry.

Through our sophisticated extraction and beneficiation process, we transform challenging magnetite ore into high-value product. Our comprehensive approach includes traditional open-pit mining followed by an advanced multi-stage process - crushing, grinding, magnetic separation, and dewatering - resulting in our signature Cape Preston Concentrate. This premium product, characterised by high iron content and minimal impurities, meets the increasingly stringent requirements of modern steelmakers focused on efficiency and environmental performance.



### 3 SUPPLIER CODE OF CONDUCT

CPM and its Related Bodies Corporate require all Suppliers working with us, in any capacity, to act with care and responsibility and not engage in activities that are illegal, unsafe, exploitive, fraudulent, corrupt, collusive, or otherwise unethical.

All Suppliers are expected to act in a manner consistent with this Supplier Code of Conduct Policy, which encompasses working in alignment with our Values. Furthermore, we encourage our suppliers to establish and hold similar expectations for their own supply chains in accordance with this Policy.

Our collective adherence to these principles fosters a culture of trust, transparency, and integrity within our supplier network, reinforcing our shared commitment to ethical business practices.

### 4 LEGAL COMPLIANCE

CPM requires our suppliers to adhere to all relevant laws and regulations, including those related to labour rights, workplace health and safety, environmental protection, product safety, bribery and corruption, sanctions and trade controls, money laundering, competition, data protection, and privacy.

Further, suppliers must adhere to all applicable international trade laws and regulations, including those related to trade sanctions imposed by relevant governmental authorities. Suppliers shall not engage in any business activities that violate trade sanctions or export control laws of any jurisdiction in which they operate. This includes, but is not limited to, conducting transactions with individuals, entities, or countries subject to trade sanctions.

Suppliers must ensure compliance across all aspects of their operations, from sourcing and manufacturing to storage, transport, and supply of products and services. Additionally, suppliers should educate and train their workforce to uphold high ethical standards, including the disclosure of conflicts of interest.

### 5 ANTI-BRIBERY AND CORRUPTION

CPM is committed to conducting fair business with integrity and expects the same commitment from our suppliers.

Suppliers must not engage in business practices that involve bribery, corruption, facilitation payments, or unethical inducements in their business activities that could impair fair competition, CPM's ability of decision-making, or potentially harm CPM and/or its reputation.

Suppliers should provide mechanisms for their workforce to report incidents, including misconduct or violations, and ensure these reports are addressed promptly and without fear of retribution.



Bribery and corruption are defined as attempts to improperly influence duties or misuse authority for personal gain. Any suspicions or instances of such behaviour must be reported immediately in accordance with our Whistleblower Policy.

## 6 ETHICAL BUSINESS PRACTICES

CPM is committed to conducting business with the highest standards of honesty, integrity, transparency, and respect for all stakeholders. As part of this commitment, we expect our suppliers to adhere to ethical business practices that uphold human rights, promote environmental sustainability, and foster fair and honest dealings in all aspects of their operations. This Policy works to describe CPMs' expectations of Ethical Business Practices across:

- Work Health and Safety
- Human Rights
- Environmental Performance
- Quality and Product Safety, and
- Confidentiality and Data Protection

Our suppliers are integral partners in our mission to uphold these values. By embracing ethical business practices, our suppliers not only contribute to the well-being of individuals and communities but also play a vital role in safeguarding the environment and promoting responsible business conduct across our supply chain.

## 7 WORK HEALTH AND SAFETY

CPM requires its suppliers to foster a culture of safe work habits and ensure and deliver a safe working environment that promotes the health, well-being, and dignity of an inclusive workforce.

Suppliers will comply with the CPM Health and Safety Policy, adhere to the Work Health and Safety (WHS) Act 2020, maintain records, report incidents, and continuously strive for improvement through preventative measures, safety audits, and incident reviews.

Suppliers will:

- Take personal responsibility for their health and safety, and that of others.
- Complete necessary training before commencing work.
- Ensure they are fit for work and report any doubts to their supervisor.
- Work in a safe manner that does not expose themselves or others to health and safety risks.
- Conduct risk assessments before and during tasks.
- Adhere to all procedures, work plans, instructions, and signage.
- Possess valid certification and authorisation to operate vehicles, plant, and machinery.



- Report hazards, incidents, injuries, or breaches of health and safety immediately to their supervisor.
- Conduct thorough incident investigations and develop corrective and preventative action plans to avoid future incidents, and;
- Comply with applicable WHS legislation, policies, and procedures.

Effective leadership and management practices should be employed to enhance WHS performance for the benefit of employees, contractors, and stakeholders.

Suppliers are expected to meet or exceed all relevant legislation, standards, codes of practice, and regulatory requirements related to WHS risks, and take necessary actions within their authority to uphold these standards.

## 8 HUMAN RIGHTS

CPM is dedicated to recognising and protecting human rights within our operations, business relationships, and throughout our supply chain.

We require our suppliers to uphold the same commitment to safeguarding human rights and dignity for all workers and stakeholders involved in their activities. This includes providing fair and equal opportunities, wages, and benefits, and prohibiting any form of discrimination, harassment, abuse, or violence based on race, colour, gender, age, religion, national origin, disability, sexual orientation, political beliefs, or any other protected characteristic.

Suppliers must ensure a safe and healthy work environment and supply chain, free from physical and mental harm, and comply with Australia's Modern Slavery Act (2018).

## 9 ENVIRONMENTAL PERFORMANCE

CPM prioritises environmental responsibility. Suppliers are required to ensure compliance with CPM's Environmental Management System, and environmental approvals, and seek opportunities for reducing their carbon emissions. We prioritise partnerships with suppliers who share our commitment to sustainability, fostering a culture of environmental awareness and action.

Suppliers are expected to actively mitigate environmental impact across their operations, including biodiversity conservation, waste management, and emissions reduction. Together we aim to make a positive impact on the environment by upholding these standards and collaborating towards sustainable practices.

## 10 QUALITY AND PRODUCT SAFETY

CPM prioritises our expectation that the delivery products, by our suppliers, are of the highest quality, and meet all technical requirements together with complying with the relevant standard where applicable. This includes ensuring that products meet all Australian safety regulations and are safe for use. Suppliers must take proactive



measures to guarantee that their products are free from defects or hazards that could pose risks to all persons' health, safety, and well-being.

Furthermore, suppliers should implement quality control processes to monitor and assess the safety and quality of their products throughout the manufacturing and delivery process. This involves conducting regular inspections, tests, and audits to identify any potential issues and address them promptly. Additionally, suppliers must provide accurate and transparent information regarding product ingredients, materials, and potential risks to CPM as requested.

By prioritising the delivery of quality products that meet minimum standards and ensuring safety for use, suppliers demonstrate their commitment to upholding ethical business practices.

## 11 CONFIDENTIALITY AND DATA PROTECTION

Suppliers must protect the confidentiality of CPM information and comply with applicable data protection legislation. All Confidential Information shall not be disclosed or used by the suppliers except as required in the performance of their respective obligations under contract or commitment and only with CPM's prior written consent, or to comply with any legal duty.

Suppliers shall not issue press releases or any public statement about the contract or matters pertaining to it without CPM's prior consent. All reproduction of documents that contain confidential information should be strictly limited to those necessary for the fulfillment of the contract. When the contract is terminated, artifacts of any kind with confidential information should be returned to CPM.

Furthermore, suppliers must ensure their best efforts are taken to maintain the confidentiality of such information and comply with any reasonable requests from CPM regarding its protection. This includes timely reporting of any suspicious or malicious activities that may compromise the security of CPM information. Upholding these principles ensures the integrity and security of sensitive data, fostering a relationship built on trust and reliability.

## 12 GOVERNANCE AND COMPLIANCE

CPM holds ourselves, and our suppliers, to the highest ethical standards across all aspects of our operations, and all stakeholder parties involved must comply fully with relevant laws and regulations governing the entire supply chain, from sourcing to delivery.

Under no circumstances do we tolerate any form of bribery, corruption, or facilitation and we provide clear channels for the reporting of misconduct or violations. This commitment underscores our dedication to maintaining a transparent and accountable business environment.

We expect our suppliers to share our unwavering commitment to ethical behaviour, fair competition, and the principles raised in this Supplier Code of Conduct Policy by adopting and promoting our commitment and encouraging their subcontractors to do the same.



Compliance with all applicable laws and regulations is non-negotiable, as is ensuring that personal interests do not interfere with contractual obligations. Our stance against bribery and corruption is unequivocal, and we provide mechanisms for the reporting and resolution of grievances to safeguard the integrity of our operation. Refer to [Section 14 Raising Concerns](#).

## 13 INVESTIGATIONS AND CORRECTIVE ACTIONS

Adherence to our Values and the Supplier Code of Conduct Policy is paramount at CPM. At CPM, besides the Health and Safety of our employees and contractors, there is nothing more important than strict adherence to our Values, Code of Conduct, and Supplier Code of Conduct Policy.

In cases where a violation of this Policy is identified, CPM will conduct investigations into the incidents. Suppliers are expected to provide their full support and always cooperate during the investigation, allowing access to related information whenever requested.

If a breach of this Policy is identified, the supplier may be temporarily blocked or permanently blacklisted at the sole discretion of CPM, which may include the possibility of Contract termination, subject to the level of breach, with all CPM's rights for indemnity reserved. Furthermore, engaging in unlawful activities may subject suppliers to potential criminal and/or civil repercussions.

Our Supplier Code of Conduct Policy details the expectations we have of our suppliers and supports addressing instances of non-compliance. Thorough investigations into such incidents aim to understand their root causes and contributing factors. Suppliers are expected to cooperate fully in these investigations, providing access to relevant information upon reasonable request. Collaboration with suppliers and stakeholders is integral to addressing identified deficiencies, mitigating any potential adverse impacts, and ensuring an environment of continuous improvement.

In cases where a supplier fails to demonstrate compliance to this Policy, within an agreed timeframe, we reserve the right to review our relationship with them, including the possibility of termination. If we determine, based on reasonable grounds, that a supplier has breached or may breach the Supplier Code of Conduct intentionally, repeatedly, or in a manner deemed serious and unlikely to be remediated, termination of our agreement(s) may be warranted. Furthermore, engaging in unlawful activities may subject suppliers to potential criminal and/or civil repercussions.

## 14 RAISING CONCERNS

CPM is dedicated to fostering a culture of corporate compliance and ethical conduct. We encourage our suppliers to report any concerns or deviations from this Policy, including any actions considered to be bribery or corruption, fraud, theft, unethical, breach of law, health, safety, or environment.

Should a supplier identify a breach of this Policy, or facts or circumstances, that indicates or could lead to a breach of this Policy, they may notify and report their concerns to the



CPM Commercial Services Department directly or confidentially and without fear of retaliation or discrimination through the CPM Whistleblower process.

## 15 PUBLIC REFERENCES

CITIC Pacific Mining <https://citicpacificmining.com/>

- [Whistleblowing Policy](#)
- [Modern Slavery Statement](#)

**Executive Chairman  
CITIC Pacific Mining**

**Mr Chen (Sam) Sui**



Date 26/03/2025