

Supplier Code of Conduct

June 2025

PLS-POL-CP-001

1 PURPOSE AND SCOPE

Pilbara Minerals Limited and its subsidiaries (**PLS, the Group**) are committed to conducting the Group's business in a responsible, ethical, and transparent manner, taking a risk-based approach. As part of this commitment, we expect all suppliers, contractors, and service providers to uphold high standards of ethics, integrity, and environmental, health, safety, and community management.

This Code of Conduct (**Code**) applies to all suppliers, contractors, and service providers (collectively, **Suppliers**) that provide goods, services, or work in any capacity for PLS. We expect our Suppliers to fully comply with this Code and to ensure that their own suppliers uphold similar standards.

2 SUPPLIER REQUIREMENTS

2.1 LEGAL COMPLIANCE

Suppliers must comply with all relevant local, national, and other applicable laws and regulations, including but not limited to those related to labour, environmental protection, safety, human rights, and data protection.

Suppliers are expected to stay informed of changes in law relevant to their operations and ensure that their practices, policies, and procedures are updated accordingly.

2.2 BUSINESS ETHICS AND TRANSPARENCY

Suppliers must operate with integrity and honesty, ensuring all business dealings are conducted in a fair and ethical manner. This includes:

- Complying with all applicable sanctions, trade and export controls.
- Preventing conflicts of interest, maintaining accurate business records, and ensuring proper reporting of financial and operational activities.
- Not engaging in any form of corruption, bribery, or any unlawful practices, under relevant anti-corruption and anti-bribery laws. Suppliers should have internal policies and procedures to prevent bribery and corruption and should be committed to ensuring that all financial transactions are compliant with applicable law.
- Complying with competition law obligations and avoiding anti-competitive conduct.
- Disclosing and appropriately managing any real or perceived conflicts of interest concerning PLS and abstaining from any improper involvement in political activities.
- Ensuring the goods and/or services they provide are of acceptable quality, safe-to-use, and meet the provided description.
- Respecting confidentiality and protecting all sensitive information provided by PLS.
- Complying with all applicable tax laws, including obligations related to tax reporting, payment, and transfer pricing. Suppliers must not engage in tax avoidance schemes or any practices that could expose PLS to reputational or legal risk.
- Respecting and protecting intellectual property rights, including PLS' proprietary information. Suppliers must not use or disclose any PLS intellectual property without proper authorisation.

2.3 HUMAN RIGHTS AND LABOUR STANDARDS

Suppliers must respect the protection of human rights and should take all necessary actions to ensure they are not complicit in human rights abuses and modern slavery, this includes:

- **Child Labour:** Not employing anyone below the legal minimum age and adhering to international standards such as the *International Labour Organization (ILO) Convention 138*.
- **Forced Labour:** Prohibiting all forms of forced or compulsory labour across their operations. Ensuring workers have the freedom to choose and leave their employment.

- **Human Trafficking:** Not engaging in practices that could contribute to or facilitate human trafficking, forced labour, or exploitation.
- **Freedom of Association and Collective Bargaining:** Respecting the right of workers to freely associate, form or join trade unions, and bargain collectively.
- **Wages, Penalties, and Working Hours:** Suppliers must ensure that workers are paid fairly and in accordance with applicable minimum wage laws. Wages must be sufficient to meet the basic needs of workers. Suppliers must also comply with local laws regarding working hours, overtime, and penalty rates. Deductions from wages must not be made for disciplinary actions or other unlawful purposes.
- **Security:** Ensuring that any public or private security forces engaged by them manage security in a way that is lawful and respects fundamental freedoms and human rights of all stakeholders and operates in line with the Voluntary Principles on Security and Human Rights

Suppliers must inform PLS if they become aware of actual or potential human rights abuses including modern slavery within their operations and/or supply chain, as well as the sourcing of raw materials or other products from conflict affected or high-risk areas.

2.4 HEALTH, SAFETY, ENVIRONMENT, AND COMMUNITY

- **Health and Safety:** Comply with all health and safety regulations relevant to their operations. They must provide a safe and healthy working environment and take proactive steps to actively promote a culture of behavioural safety, wellbeing and prevent accidents, injuries, and illnesses. Maintain safety management systems, deliver appropriate training and implement risk management and emergency preparedness plans with regular reviews as appropriate.
- **Environmental Management:** Act in a manner that minimises the impact on the environment by complying with environmental laws, promoting sustainable resource use, reducing emissions and waste, water use and protecting biodiversity.
- **First Nations Peoples Engagement:** Respect the rights and interests of First Nations peoples in all areas where they operate in a culturally appropriate, meaningful, open, honest, and mutually respectful manner consistent with Free, Prior and Informed Consent (FPIC) principles. Suppliers are encouraged to develop First Nations employment, training, and business development opportunities where appropriate.
- **Community Engagement:** Consider the social and environmental impacts of their operations on local communities, particularly First Nations peoples, engaging early and regularly as required, and contribute positively to local development. Support local business ventures and procurement, where possible.

2.5 INCLUSION AND WELLBEING

Suppliers should take reasonable steps to promote diversity, inclusion, and wellbeing, and ensure there is no discrimination, harassment, or abuse within their operations by:

- Having a zero-tolerance policy towards bullying, harassment, or discrimination in the workplace. All forms of harassment, including sexual, verbal, racial, physical, and visual harassment, are not accepted.
- Fostering a work environment that promotes mutual respect and dignity for all individuals and where employees feel safe to report any violations of their rights or misconduct.
- Implementing policies and practices to prevent, address, and remedy bullying, harassment, or discrimination, including creating safe and accessible mechanisms for reporting incidents.
- Being responsible for ensuring that their employees and representatives are educated on the issue of bullying, harassment, and discrimination and are trained to recognise and address it in a timely and appropriate manner.
- Offering equal opportunities to all employees in recruitment, promotion, and treatment.

2.6 CYBERSECURITY, PRIVACY AND DATA PROTECTION

- Adhere to all applicable data protection and cybersecurity laws and regulations.
- Implement robust data security measures to protect confidential, personal, and sensitive data from unauthorised access, misuse, loss, or theft.
- Ensure the integrity and confidentiality of any data that they handle on behalf of PLS, including the use of encryption, secure storage, and access controls.
- Report any data breaches or cybersecurity incidents in accordance with applicable law and take corrective actions to mitigate risks and prevent future occurrences.

2.7 SUPPLY CHAIN TRANSPARENCY AND DUE DILIGENCE

- Implement a robust supply chain management system that promotes transparency, traceability, and accountability. This includes conducting appropriate screening and due diligence to ensure that sub-suppliers and contractors also adhere to ethical standards and ensuring they are not engaging in transactions with sanctioned persons.
- Ensure responsible sourcing of raw materials and comply with international guidelines such as the *OECD Due Diligence Guidance for Responsible Supply Chains*.
- Identify whether their products contain minerals designated as "conflict minerals" or are sourced from known high-risk areas.

3 SOCIAL MEDIA AND COMMUNICATIONS

Suppliers must not reference, use, or display PLS' brand or logo on social media platforms or otherwise, without prior approval from PLS.

4 MONITORING AND COMPLIANCE

- PLS reserves the right to assess and audit Supplier compliance with this Code. Suppliers are to provide (upon request by PLS) necessary information and documentation to demonstrate adherence to this Code.
- If a Supplier is found to be in violation of any part of this Code, they will be required to implement corrective actions within a reasonable time frame. In cases of continued non-compliance or serious breaches, PLS reserves the right to terminate the relationship with the Supplier.
- Suppliers must promptly report to PLS any suspected violations of this Code or legal/regulatory violations relevant to their engagement with the Group.

5 RAISING A GRIEVANCE

PLS is committed to providing a safe, ethical and transparent mechanism to encourage all stakeholders to identify and raise issues and concerns regarding potential violations of this Code. All reports will be treated confidentially to the extent permitted by law.

Suppliers must implement their own appropriate grievance mechanisms accessible to employees and stakeholders, with appropriate procedures for confidentiality, non-retaliation, and fair investigation.

6 ACKNOWLEDGMENT

PLS expects all Suppliers to demonstrate a commitment to the requirements of this Code. By entering into a business relationship with PLS, the Supplier acknowledges that it has read, understood, and has agreed to comply with the terms outlined in this Code.

This Code is subject to periodic review and updates to ensure continued alignment with evolving global standards and regulations.

POLICY HISTORY

This Policy will be periodically reviewed by Management and amended as required.

ESTABLISHED:	20 June 2025
LAST REVIEWED:	N/A
N/AFREQUENCY	Annually