SAYONA



Sayona Mining Limited

FY24 Modern Slavery Statement

About this Statement

This Modern Slavery Statement ("Statement") has been prepared by Sayona Mining Limited (ABN 26 091 951 978) in accordance with the requirements of the *Australian Modern Slavery Act 2018* ("Australian Act") for the financial year ending 30 June 2024. This is the first Modern Slavery Statement prepared by Sayona Mining Limited.

This Statement is also prepared as a joint statement in accordance with subsections 11(1) and 11(3) of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023* ("Canadian Act"). Controlled subsidiaries of Sayona Mining Limited including Sayona Inc. and North American Lithium Inc. are also reporting entities under the Canadian Act.

On 19th November 2024, Sayona Mining and Piedmont Lithium Inc. announced the signing of a definitive agreement to combine the two companies to create a leading lithium business, resulting in Sayona being the ultimate parent entity. Completion of the Transaction is subject to shareholder approval for both companies and is expected to close in the first half of calendar year 2025.

In this Statement relating to financial year ending 30 June 2024, 'Sayona Mining', 'the Company', 'the Group', 'we', 'us' and 'our' refer only to Sayona Mining Limited and its controlled entities, unless otherwise stated.

Consultation

A Sayona Mining Modern Slavery Working Group was formed to guide the development of our first Modern Slavery Statement. This working group includes Sayona Mining's CFO, General Counsel and Company Secretary, Director of Investor Relations, and President and Chief Operation Officer of Canada. Key team members from our operations and exploration projects in Canada and Australia were also involved including Supply Chain, Human Resources, Communication and Community, Environment and Sustainability, Finance and Commercial teams.

> A Sayona Mining Modern Slavery Working Group was formed to guide the development of our first Modern Slavery Statement.



Reporting Criteria

Report Contents	Australian Reporting Criteria	Canadian Reporting Criteria
About this Statement Consultation	(1) Identify the reporting entity. (6) Describe the process of consultation with any entities the reporting entity owns or controls.	—
About Sayona Mining Limited Our Structure Our Operations and Business Activities Our Supply Chain	(2) Describe the reporting entity's structure, operations and supply chains.	11(3) (a) Describe structure, activities, and supply chains.
Actions Taken to Assess Modern Slavery Risks in our Operations and Supply Chain	(3) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	11(3) (c) Describe the parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.
Actions Taken to Address Modern Slavery Risks	(4) Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	11(3) (b) Describe policies and its due diligence processes in relation to forced labour and child labour, (d) any measures taken to remediate any forced labour or child labour, (e) any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains, (f) the training provided to employees on forced labour and child labour.
Reporting on Progress	(5) Describe how the reporting entity assesses the effectiveness of actions to assess and address modern slavery risks.	(g) how the entity assesses its effectiveness in ensuring that no forced labour or child labour is used in its business and supply chains.



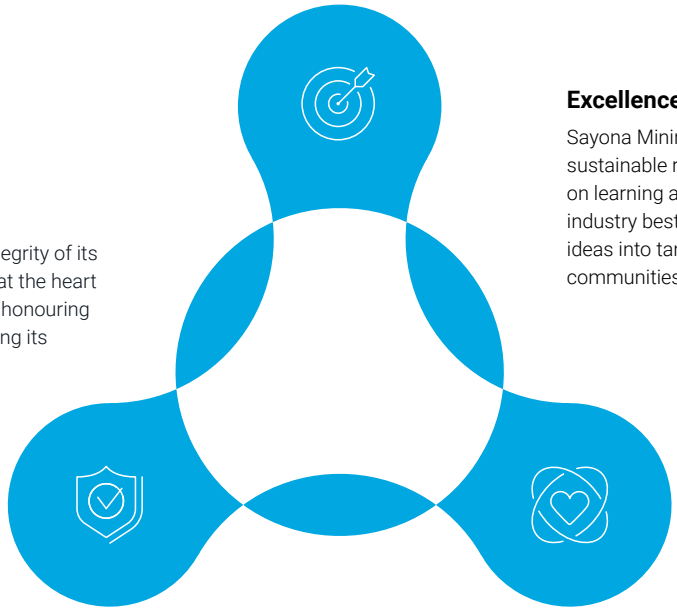
About Sayona Mining Limited

Sayona Mining is listed on the Australian Securities Exchange and has a vision to support global decarbonisation by sustainably producing high quality lithium products. We are an emerging leader in the supply of lithium to North America where we produced 155,822 dry metric tonnes of spodumene concentrate during the FY24 reporting period. We are also completing further exploration activities across our tenements in Australia and Canada.

Our Values

Integrity

Sayona Mining places the integrity of its organisation and its leaders at the heart of its fundamental values by honouring its commitments and following its guiding principles.



Excellence

Sayona Mining aims to achieve optimal and sustainable results by promoting an approach built on learning and continuous improvement. It uses industry best practices and transforms innovative ideas into tangible results for the benefit of communities, shareholders and stakeholders.

Respect

Sayona Mining is committed to conducting its mining activities with respect for the environment, local communities, and all the stakeholders involved. It ensures that it respects the people around its organisation and treats them with dignity and kindness.

Our Strategy



Optimise operations

Maximise returns and cash flow by sustainably optimising our operations.



Expand resource base

Expand known mineral resources, and continue value accretive exploration.



Develop assets

Rapidly develop upstream assets and pursue value accretive growth options.



Integrate downstream

Evaluate partnering and JV opportunities for downstream integration.



Strategic partnerships

Develop strategic partnerships to lock-in demand, provide access to end markets, and accelerate development of our portfolio.

Our Structure

The ultimate parent entity of the Group is Sayona Mining Limited, which is incorporated and domiciled in Australia.

The registered office of the Company is Level 28, 10 Eagle Street, Brisbane QLD 4000. Subsidiary entities controlled by the Company as of 30 June 2024 are as follows:

Subsidiaries	Country of incorporation	Principal activity	Ownership interest 2024 %
9474-9454 Québec Inc.	Canada	Exploration	100
North American Lithium Inc.(1)	Canada	Lithium mining and processing	75
Sayona East Kimberley Pty Ltd	Australia	Exploration	100
Sayona Inc.	Canada	Administrative, management and support services	100
Sayona International Pty Ltd	Australia	Investment holding company	100
Sayona Lithium Pty Ltd	Australia	Exploration	100
Sayona North Inc.	Canada	Exploration	100
Sayona Québec Inc.	Canada	Investment holding company	75

(1) Non-controlling ownership interest of 25 per cent is held by Piedmont Lithium Québec Holdings Inc.

Sayona at a Glance

Canada

Employees
222

Contractors*
371

Montreal Office

Activities: Corporate activities leading and supporting our operations in Quebec including Canadian based Executive Leaders, Human Resources, Commercial and Finance teams.

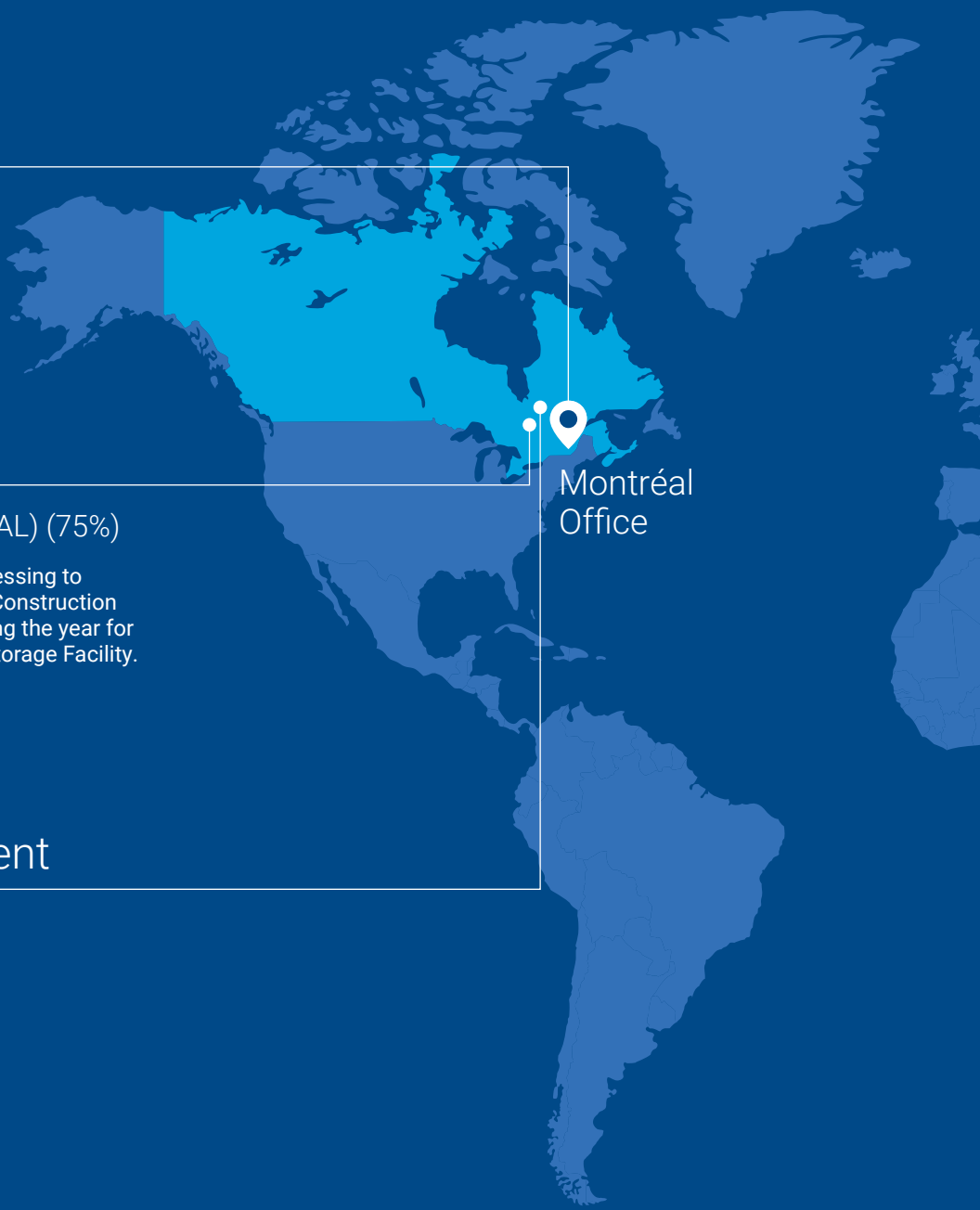
Mining Operation

North American Lithium (NAL) (75%)

Activities: Lithium mining and processing to produce Spodumene Concentrate. Construction activities were also carried out during the year for a Crushed Ore Dome and Tailings Storage Facility.

Exploration and Project Development

Activities: Completing studies and drilling programs on claims across our Eeyou Istchee James Bay Hub and Abitibi-Témiscamingue Hub.



*Number of contractor workers that carried out activities at our operation and project sites during the year. Not full time equivalent (FTE) workforce.



Australia

Employees
9

Contractors*
10

Exploration

Activities: Geochemical sampling, drilling and gravity surveying undertaken during periods throughout the year, primarily by contractor workforce.

Corporate Head Office

Activities: Group corporate activities including Executive Leaders, Investor Relations, Legal and Finance teams.

Our Operations and Business Activities

Around 80% of our global workforce in FY24 was located at the North American Lithium (NAL) Mine. NAL spans 1,493 hectares, situated near La Corne township in Québec's Abitibi-Témiscamingue region. The operation has a lithium mine and concentrator, with production of spodumene concentrate having recommenced in March 2023.

Mining Activities—North American Lithium

Sayona Mining has made significant strides at the NAL operations over the past year, as we moved towards completion of ramp-up. By August 2023, Sayona Mining achieved the first shipment of spodumene concentrate to the international lithium market, accomplished in under two years since acquiring NAL. Throughout the year, plant operations have continued to improve with the successful completion and commissioning of key infrastructure projects. These projects have been instrumental in stabilising plant utilisation and supporting higher production.

Throughout the restart and subsequent operations, we maintained a strong focus on health, safety, and environmental management. During the year we implemented a comprehensive Health and Safety Management System designed to identify, assess, and mitigate risks associated with our mining operations. This system includes regular safety audits, risk assessments, and the implementation of best practices to ensure a safe working environment. We also engage with local communities to address their concerns and ensure that our activities do not adversely affect their wellbeing.

The Company encourages the hiring of local employees. Of NAL's 182 employees during FY24, 152 were from the Abitibi-Témiscamingue region of Quebec. We also engage contractors who work on site carrying out drilling, blasting, loading and transport of ore and waste rock, maintenance of mining roads and other services related to mine operations. These contractors contributed an additional 291 people to our on-site activities during the year.

During the approvals process for NAL, prior to Sayona Mining acquiring the project, comprehensive assessments were carried out to understand and mitigate potential environmental and social impacts. The assessment decision and associated reports are available on the Canadian Government website **here**.

Project Development and Exploration Activities

During the year we also continued to carry out exploration activities in Australia in the East Kimberly, Pilbara and Yilgarn regions of Western Australia and in Quebec at our Abitibi-Témiscamingue and Eeyou Istchee James Bay Hubs. These activities include studies and drilling programs undertaken primarily by a contractor workforce. In Western Australia, this work involved a contractor workforce of 10 people during FY24. In Quebec, on-site contractors contributed around 80 people to these exploration activities at the Moblan Lithium Project during the year.

Group Corporate Activities

We also have offices in Australia and Canada supporting corporate activities including those of our Executive, Finance, Investor Relations, Legal, Commercial, and Human Resources teams.



~84%

of NAL employees are from the Abitibi-Témiscamingue region of Quebec



Our Supply Chain

During FY24 we worked with over 900 Tier 1 suppliers. These are the suppliers that we buy directly from and/or have contractual agreements with. Approximately 90% of these supported our operations in Canada with the remaining 10% associated with exploration and corporate activities in Australia. Procurement activities during the year included the following products and services:

Products

- **Electricity and Fuel**
- **Reagents and Chemicals**
- **Construction Materials including Metal and Geosynthetics**
- **Machinery**
- **Electronic and IT equipment**
- **Uniforms and Personal Protective Equipment (PPE)**

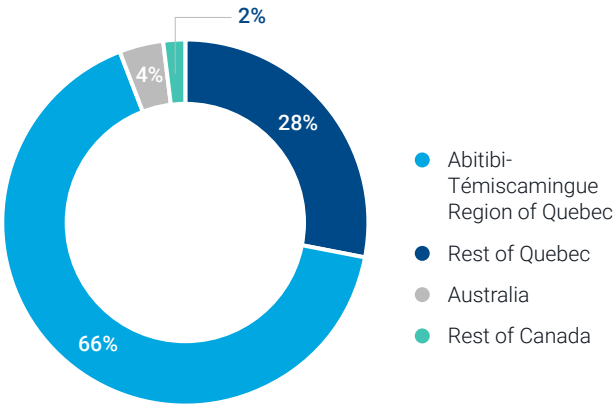
Services

- **Mining, exploration and construction contractors (including equipment and labour hire)**
- **Consultants including professional services such as Engineering, IT, Environmental and Legal**
- **Lab Services**
- **Equipment Maintenance**
- **Waste Management, Security and Cleaning Services**
- **Workforce Travel**
- **Product Transport and Logistics**

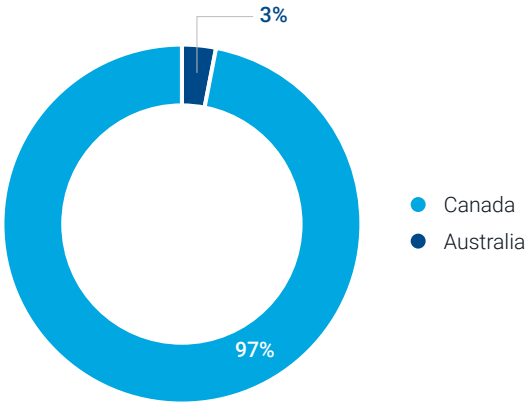
Our Workforce

Our employees and contracting partners provide the skills, experience and technical expertise needed to safely and successfully operate our business. The geographic distribution and diversity of our workforce during FY24 is summarised below.

Employee Location

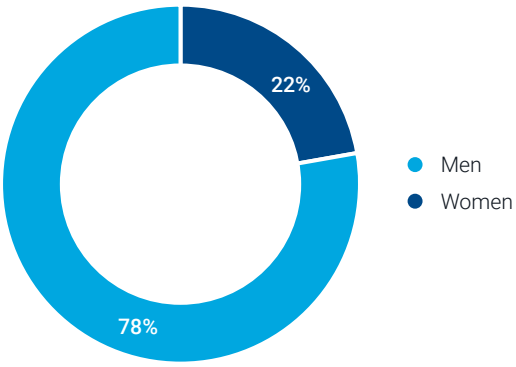


Contractor Location

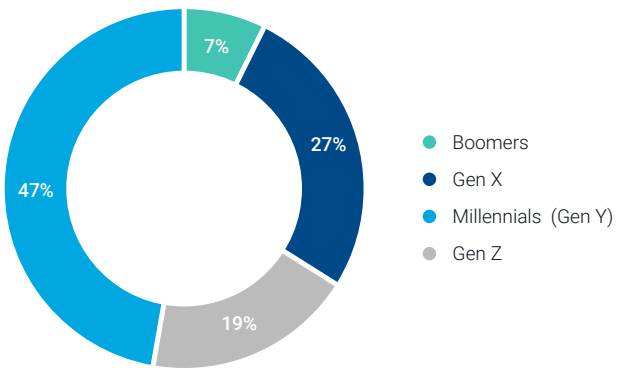


The mining industry has traditionally had a low representation of women. In Canada, recent estimates(2) put this figure at 16.8%. Our global employee workforce in FY24 consisted of 22% women and 78% men across the following age ranges.

Employee Gender Diversity



Distribution of Generations

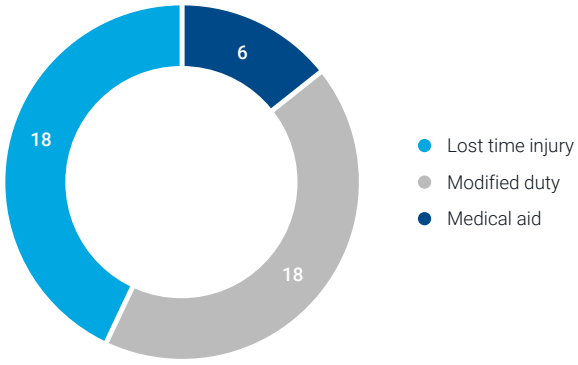


(2) **Mining Industry Human Resources Council, 2024 Canadian Mining Workplace Profile**



Total Recordable Injuries

There were no recordable safety incidents in our Australian workforce during FY24. Total recordable injuries for our Canadian workforce during the year are shown below. This is inclusive of employees and contractors.



Actions Taken to Assess Modern Slavery Risks in our Operations and Supply Chain

Modern Slavery, as defined by the Australian Act, refers to serious exploitation including trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour refer to situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Overview

In preparation of our first Modern Slavery Statement, we have conducted a preliminary assessment of potential risk factors across our operations and supply chains to identify where we could be at risk of causing, contributing to, or being linked to modern slavery.

This section of our Statement includes a summary of the key risk factors identified, relevant to our operations and supply chain.



Risks in our Operations

Our mining operations are located in Canada and our exploration and corporate activities are in Canada and Australia. Although incidents of modern slavery are found in all countries, the governments of Australia and Canada have both implemented relatively strong responses and have lower prevalence of, and vulnerability to, incidents of modern slavery(3).

Australia and Canada have laws in place specifying minimum age requirements for mine workers. In Quebec, the **Regulation respecting occupational health and safety in mines** sets the minimum age at 16 years for surface mine workers, 18 for underground mine workers and 20 for individuals if employed as a blaster. The **Western Australian Work Health and Safety (Mines) Regulations 2022** set the minimum age for a mine industry worker at 16 unless the mine is underground in which case it is 18.

We have identified that approximately 50% of our FY24 procurement spend was on site-based contractors carrying out mining operations, construction and exploration activities at our sites. These contracts often include labour and equipment hire. Using labour hire companies can introduce additional risk factors for modern slavery as recruitment of workers is caried out by other parties. Labour hire in sectors where lower-skilled labour and outsourcing are prevalent such as construction and cleaning have also been identified as higher risk(4).

(3) Walk Free 2023, **Global Slavery Index**

(4) Australian Centre for Corporate Responsibility (ACCR) 2021, **Falling through the Cracks? Labour hire, Contracting and Outsourcing Risks across the ASX100**

Risks in our Supply Chain—Geographic

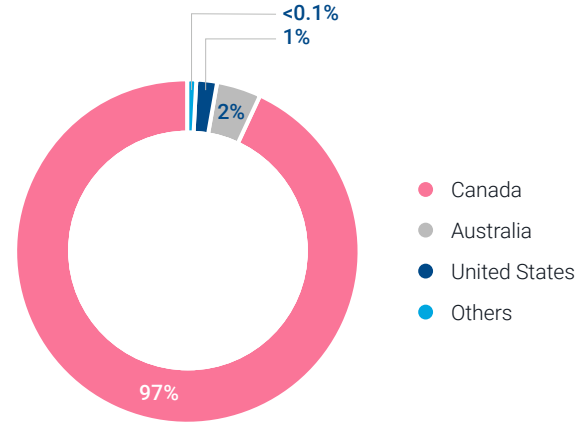
The locations of our Tier 1 suppliers by spend and number during FY24 are summarised below.

The estimated prevalence of modern slavery per 1000 people for all countries where our Tier 1 suppliers are located is shown in the table below.

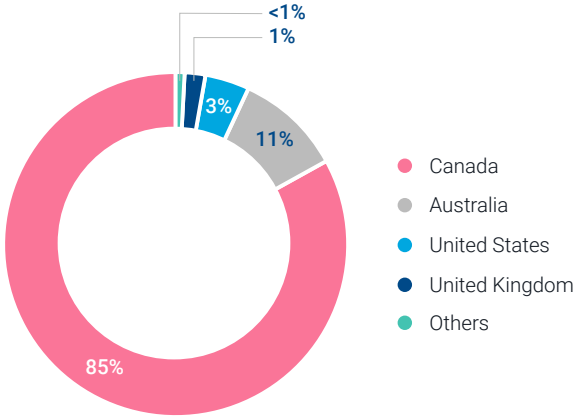
Approximately 99% of our Tier 1 procurement spend in FY24 was with suppliers based in Canada and Australia where the prevalence of modern slavery is estimated to be relatively low. The remaining 1% of spend on products and services during the year was from companies based in the United States, United Kingdom, China, Madagascar and Singapore.

We recognise that there will be further geographic risk beyond our Tier 1 suppliers for products that each have their own, often complex supply chains. These risks can be higher for certain industry categories that we have outlined below.

FY24 Tier 1 Supplier Spend by Location



FY24 Tier 1 Suppliers by Location



Country	% of Supplier Spend	Estimate of Prevalence of Modern Slavery (per 1000 people)[5]
Canada	~97%	1.8
Australia	~2%	1.6
United States	<1%	3.3
United Kingdom	<0.1%	1.8
China	<0.1%	4.0
Madagascar	<0.1%	4.6
Singapore	<0.1%	2.1

Risks in our Supply Chain—Industry

Products and services we procured during FY24 that have been recognised as having higher risk factors for modern slavery in their supply chains include[6]:

- Electronics
- Garments and Textiles
- Raw Materials used in some Building Supplies and Equipment
- Seaborne International Freight.

Further assessment beyond our Tier 1 suppliers is required to assess and mitigate risks associated with these products and services.

Risks in our Supply Chain—Entity

We prioritise collaborating with local companies and advocate local sourcing and hiring. Greater than 65% of our global procurement spend during FY24 was with companies located in the Abitibi Region of Quebec near our NAL mining operation. We understand that there could be additional risk factors present when we work with smaller entities that may still be developing their own governance and due diligence procedures.

> Greater than 65% of our global procurement spend during FY24 was with companies located in the Abitibi Region of Quebec near our NAL mining operation.

(5) Walk Free 2023, **Global Slavery Index**

(6) Walk Free 2023, **Importing risk**

Actions Taken to Address Modern Slavery Risks

Sayona Mining is committed to a high level of corporate governance and promoting a culture that values trust, cooperation and mutual respect. Our Board is a strong advocate of good corporate governance and believes that a high standard of corporate governance is paramount for sustainable long-term performance and value creation. This includes understanding potential risk factors (including those for modern slavery) within our operations or supply chain and overseeing management's mitigation response.

Governance Approach and Risk Management

The **Audit and Risk Committee** (ARC) assists the Sayona Mining Board in fulfilling its statutory and fiduciary responsibility relating to the identification and management of social sustainability risks. The Committee considers new and emerging sources of risk and the risk controls and mitigation measures that management has put in place to deal with those risks.

We have risk management processes, and internal control systems across the entire business, including all operations and projects where we have operational control. The risk focus is on material issues that could prevent the delivery of Sayona's objectives (including, without limitation, safety, sustainability, and exposure to environmental and climate change risks). The annual review of the Company's risk management processes has identified the need to enhance and expand the effectiveness of the Group's risk management program over the next 12 months. This process will enable the further integration of risks such as human rights and modern slavery within the Group's existing risk controls and mitigation measures outlined below.

Corporate Policies

The corporate policies of Sayona Mining Limited are available on our company **website**. These include:

Code of Conduct

Sayona Mining has a Code of Conduct in place that outlines the standard which the Board, management and employees are required to comply with when dealing with each other, shareholders, and the broader community. The Code applies to all Sayona Mining directors, managers, employees, contractors, agents and other intermediaries engaged by Sayona Mining and its subsidiary companies.

Whistleblower Policy

Our Whistleblower Policy outlines a safe and secure means of raising concerns or grievances by anyone who is aware of a possible wrongdoing that goes against our Code of Conduct.

This process will enable the further integration of risks such as human rights and modern slavery within the Group's existing risk controls and mitigation measures.

Operational Policies and Procedures—Canada

With approximately 97% of our workforce and supplier spend based in Canada, we have measures in place developed specifically for these locations.

Training

Employees receive training in company policies. Our expectations for ethical conduct are outlined in the induction materials provided to each new employee. These include our commitment to:

- Respecting and promoting the fundamental principles of internationally recognised human rights, as by the International Bill of Human Rights and the fundamental Conventions of the International Labour Organisation, following the recommendations of the Guiding Principles on Business and Human Rights
- Providing working conditions that respect employees and comply with applicable laws
- Creating a safe and healthy work environment
- Being a strong opponent of child labour, forced labour and modern slavery.

Responsible Sourcing Policy

Our Responsible Sourcing Policy was developed in 2022 with a focus on our operations in Canada. The Policy standardises the procurement approach across each department and addresses the integration of social, ethical and environmental performance factors into the supplier selection process.

Purchasing Procedure

We have an internal procedure in place that outlines the steps required by relevant stakeholders to comply with the Responsible Sourcing Policy. This procedure is owned by the Supply Chain department reporting through to the President and Chief Operating Officer of Canada who reports directly to Sayona Mining's Managing Director and CEO.

Working with Site-based Contractors

We prioritise working with contractors that share our values with a key focus on increasing local and indigenous employment in the regions where we operate. Our Responsible Sourcing Policy also outlines our expectations relating to suppliers and contractors. These include that they must adhere to Sayona's policies when on site, exercise vigilance regarding the health, safety and wellbeing of their own employees, suppliers and communities, and comply with all laws and regulations applicable to the work they perform.

Community Engagement and Grievance Mechanisms

We have established a Good Neighbourhood Committee which will be instrumental in ensuring that we adhere to the highest standards of community engagement and support at our NAL Project.

We have also established a **Concern Hotline**. This hotline is advertised on the Sayona Canadian website and provides a means for any concerned stakeholder to contact Sayona and raise any concerns related to our operations and projects. During FY24 Sayona implemented a streamlined process to manage reports and concerns at NAL efficiently. Feedback is provided promptly to the party raising the concern demonstrating our commitment to transparent and responsive communication.

External Partnerships

Our exploration focused activities in Canada have implemented an integrated management system aligned with the UL ECOLOGO standard. This standard, unique in Canada, considers all aspects of sustainable exploration activities such as Health and Safety, Environment, Community Relations, Ethics and Corporate Governance. Internal and external audits were carried out during the year and certification was achieved in June 2024.

Through our **membership** of the Quebec Mining Association, we have also committed to implementing the **Towards Sustainable Mining** (TSM) Protocols at NAL. These include the **Preventing Child and Forced Labour Protocol.** As required by TSM, results of our annual self-assessments will be submitted to a qualified independent auditor for verification every three years. We will use the results of these audits to continue learning from industry best practice and implement ongoing improvements that can also be applied to our other projects.

Operational Policies and Procedures—Australia

Our exploration activities in Australia are carried out with the assistance of qualified contractors. We work with contractors and suppliers with a long-standing presence operating in the Western Australian mining and exploration sector.

The safety and wellbeing of our contractors is managed by our Registered Exploration Manager who reports directly to Sayona Mining's CEO. Our Safety Management System tracks induction training for site-based contractors on our Policies including Health and Safety, Anti-Discrimination, Cultural Heritage and Environment. Hours worked and any recordable incidents are reported to the Western Australian Department of Energy, Mines, Industry Regulation and Safety (DEMIRS). There were no reportable incidents, injuries or illness during FY24.

Reporting on Progress

This is Sayona Mining Limited's first Modern Slavery Statement. We have identified the following action items to further assess and mitigate modern slavery risk factors across our operations and supply chain. Our progress completing this action plan will be reported in future Modern Slavery Statements as we continue to develop processes for measuring effectiveness of these actions in mitigating risk factors for modern slavery in our operations and supply chains.

Modern Slavery Action Plan

Focus Area	Proposed Actions
Governance	• Standardise and centralise relevant governance policies, and procedures across the global business including a Human Rights Policy incorporating operations and supply chain in the scope. • Publish all Policy Documents and relevant Supplier Procedures in English and French and make available on Group website. • Formalise Sayona's Modern Slavery Working Group and establish roles and responsibilities for: - further defining and implementing this action plan - tracking progress - reporting on progress internally - developing external disclosures in line with evolving regulatory requirements and the expectations of our customers.
Risk Assessment and Due Diligence	• Review supplier due diligence process and incorporate assessment of modern slavery risk along with anti-bribery and corruption measures of each region where we operate. • Review and update standard supplier Terms & Conditions to incorporate relevant ESG clauses. • Develop targeted review process incorporating supply chain beyond Tier 1 for products and services flagged as higher risk. Implement processes to ensure workers in these supply chains have contracts that they understand, are in possession of their identity documents and are not required to pay recruitment fees.
Training	• Include content on Human Rights and Modern Slavery mitigation measures with roll out of Code of Conduct Training across the global business. • Implement more detailed training for specific employees working in procurement teams and contractor management roles.

Approval and Attestation

This Statement was approved by the Board of Sayona Mining Limited on 18 December 2024.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities controlled by Sayona Mining. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year ending 30 June 2024.

Lucas Dow
Managing Director and Chief Executive Officer
18 December 2024

I have the authority to bind Sayona Mining Limited.



SAYONA

sayonamining.com.au