The Rio Tinto Group has prepared this Statement to meet the requirements of the Australian Modern Slavery Act 2018 (Cth) (Australian MSA) and the United Kingdom’s Modern Slavery Act 2015 (UK MSA). It covers the period 1 January 2021 to 31 December 2021 for the Australian MSA and UK MSA reporting entities identified in Appendix 1, the reporting entities’ owned and controlled entities and our managed joint venture operations or assets.

This Statement applies to Energy Resources of Australia Ltd and Queensland Alumina Limited, which both report under this Statement. This Statement does not apply to any of our other non-managed joint ventures; however, we have highlighted our work to identify overarching risks relating to, and set expectations of, non-managed joint ventures for alignment with our core standards.

This Statement uses the Australian MSA definition of modern slavery which includes slavery, servitude, forced labour, debt bondage, forced marriage, trafficking in persons, deceptive recruiting for labour or services and the worst forms of child labour. The UK Government uses a similar definition.

The information in this Statement applies to all reporting entities unless we are aware of a reporting entity having different policies or processes to those of the Rio Tinto Group to identify and manage modern slavery risks. In those cases, we have provided additional information.

The Rio Tinto Group consists of Rio Tinto plc (registered in England and Wales as company number 719885 under the United Kingdom’s Companies Act 2006 and listed on the London Stock Exchange) and Rio Tinto Limited (registered in Australia as ABN 96 004 458 404 under the Australian Corporations Act 2001 (Cth) and listed on the Australian Securities Exchange) and their owned and controlled entities.

Rio Tinto plc and Rio Tinto Limited operate together under a dual listed structure and are referred to in this report as Rio Tinto. The words “we”, “us”, “our” and “ourselves” are used to refer to the companies of the Rio Tinto Group in general. These terms are used for convenience. They are not intended to convey how the Group is structured, managed or controlled from a legal perspective. Any reference to “our people” includes our directors, officers, employees and category 1 contractors (being a contractor who provides services under the direction of Rio Tinto leaders).

The Australian MSA requires reporting on modern slavery risks in a reporting entity’s operations and supply chains. We use “business” in place of “operations” as for us, the term “operations” has a specific meaning to describe operating mines, smelters and refineries and may not encompass all business activities.

This Statement was approved on 5 May 2022 by the combined Rio Tinto Limited and Rio Tinto plc Board on behalf of all reporting entities in the Rio Tinto Group. The Statement has been signed by the Chief Executive of Rio Tinto (page 2).

This 2021 Statement is our second under the Australian MSA and sixth under the UK MSA. Appendix 2 explains how we have addressed the reporting criteria of both these Acts.

This Statement has not been externally assured; however, an internal verification process has supported the integrity of our disclosures.

We welcome feedback at sustainability@riotinto.com.
When I became Chief Executive in 2021, I set four objectives to help make Rio Tinto an even stronger company: being the best operator; achieving impeccable environmental, social and governance (ESG) credentials; excelling in development; and strengthening our social licence.

I was convinced then, and remain so today, that realising these objectives relies on putting respect for people at the heart of everything we do – the people in our workforce, in the communities where we operate, in our supply chain and others with whom we interact. This is also the foundation of our human rights commitment: to treat people with dignity and respect. We do not always get this right – as revealed by the destruction of the rock shelters at Juukan Gorge in May 2020 and the findings of the Everyday Respect report earlier this year – but we are committed to learning from our mistakes and doing better.

Preparing our annual Statement on Modern Slavery allows us to reflect on our efforts to respect human rights, including the right to freedom from slavery, and to share our progress, where challenges persist and what we can do better.

In 2021, I was encouraged to see improvements in how we assess modern slavery risks and our targeted internal and external training – people are the first line of defence in identifying and addressing modern slavery risks. And knowing the heightened risks facing seafarers during COVID-19, our ongoing engagement with ship managers is particularly important, informing practical steps we can take together to mitigate modern slavery risks.

In 2022, our ongoing capacity building, new assessment tools and strengthened governance will help us better identify potential modern slavery risks and direct action where it is most needed. As no single organisation can address the systematic failures that allow modern slavery to occur, we will continue to prioritise meaningful collaboration with peers, suppliers, governments, civil society organisations and others.

I am pleased to present and sign our 2021 Statement on Modern Slavery, and I welcome your feedback. We are driven by continuous learning and working toward a future without modern slavery.

Jakob Stausholm
Chief Executive
5 May 2022
1. Our structure, business and supply chains

Our structure and business

We are a multinational mining and metals company with 49,000 employees, operating in around 35 countries, across around 60 operations and projects.

We operate as a combined Group consisting of Rio Tinto plc (registered in England and Wales) and Rio Tinto Limited (registered in Australia). We are headquartered in London and Melbourne, with offices in Perth, Brisbane, Singapore and Montreal among other places. Our workforce consists of approximately 95% employees and 5% category 1 contractors.2

We produce the materials essential to human progress. Our portfolio includes iron ore, aluminium, copper, diamonds, titanium dioxide, salt and borates.

Our mine to market lifecycle

We own and operate open pit and underground mines, mills, refineries, smelters, power stations and research and service facilities. Alongside other delivery partners, we also use our own railways, ports and ships to deliver materials to our customers. We have significant operations in Australia, Canada, Mongolia and the US and important assets elsewhere, including businesses and operations in Asia, Europe, Africa and South America. We also invest in a range of other entities through joint venture activities. This includes non-managed operations in Chile, Brazil, Australia and Guinea.

Our website explains more about our business, including our strategy, products, projects and operations, locations and our sustainability approach.

1. Includes our share of joint ventures and associates (rounded) and excludes contractors.
2. This workforce data is based on our managed operations (and excludes our non-managed operations and joint ventures) as of 31 December 2021. It excludes Non-Executive Directors and the Executive Committee. A category 1 contractor is a contractor who provides services under the direction of Rio Tinto leaders.
Our product groups

Iron Ore
Iron ore is the primary raw material used to make steel. Steel is strong, long-lasting and cost-efficient, making it perfect for everything from wind turbines to skyscrapers and ships.

In the Pilbara region of Western Australia, we produce five iron ore products, including the Pilbara Blend™, the world’s most traded brand of iron ore.

Our Dampier Salt operations in Western Australia are the world’s largest exporter of seaborne salt, produced from evaporating seawater.

This quality product suite is well positioned to benefit from continued demand across China, Japan and other markets.

Aluminium
Aluminium is one of the world’s fastest-growing major metals. Lightweight and recyclable, it is found in everything from solar panels to electric vehicles and smartphones.

Our vertically integrated aluminium portfolio spans high-quality bauxite mines, alumina refineries and smelters which, in Canada, are powered entirely by clean, renewable energy.

Our unique assets allow us to provide responsible aluminium with a low-carbon footprint, traceable from mine to metal.

Our low-cost, hydro-based aluminium smelters will continue to grow their distinct structural advantages as we move towards a net zero world.

Copper
Copper is essential to the transition to a low-carbon future as it plays a key role in electrification and power generation, including in renewable energy and electric vehicles.

Our operations span the globe, from Mongolia to Chile to the US, and occupy various stages of the mining lifecycle.

With global decarbonisation goals set to drive growing demand for copper and other key commodities, our pipeline of growth projects strongly positions us as a partner in sustainable growth.

In addition to copper, our product group also includes the Simandou iron ore project in Guinea, the largest known undeveloped high-grade iron ore deposit in the world.1

Minerals
Our Minerals product group provides materials essential to a wide variety of industries, ranging from agriculture to renewable energy and electric vehicles.

We produce high-grade, low-impurity iron ore pellets and concentrate, titanium dioxide, diamonds and borates from our operations in Canada, Madagascar, South Africa and the US.

We contribute to Rio Tinto’s sustainable growth by unlocking value from our high-grade orebodies and developing new materials.

By reprocessing mining waste to extract valuable by-products, we are expanding our frontiers and meeting the increasing demand for critical minerals, such as lithium and scandium.

1. Simandou is an iron ore project but is reported under Copper due to the management structure.
Our supply chains

The goods and services we buy span the mining asset lifecycle, from exploration and construction services when we build our mines, to on-site transport, catering and equipment for running our operations and tools for land rehabilitation when we close a site.

Our contestable spend is managed by Procurement, Marine and Logistics, Major Projects, or the business units. With approximately 426 employees in 25 locations, the Procurement team manages the majority of the spend through a category management approach and business partnering teams. Our Purchase to Pay team provides support for most of the spend.

Our largest spend categories – which accounted for approximately 80% of our total 2021 spend – are contracted labour and facilities management, mining equipment, professional services (such as technology, consultancy and travel), fuel and energy, and logistics.

We strive to support communities where we work through buying local products and engaging local services. For example, from 2020 to 2021, we increased our spend with Indigenous suppliers in Australia by almost 40% to A$400 million. In Mongolia, between 2010 and the end of 2021, Oyu Tolgoi spent $4.1 billion on national procurement.

1. Contestable spend is spend managed by Procurement, Marine, Major Projects and business units, which includes capital expenditure and operating expenditure, excluding spend such as donations and gifts, fees to government/legal authorities, intercompany payments, membership and association fees, taxes and employee payments and expenses and costs associated with semi-finished goods. It excludes spend from ERA and QAL which are also reporting under this Statement. Please note this measure differs from “Payments to suppliers” of $19.4 billion as included in our 2021 Annual Report, which is based on the Rio Tinto Group income statement and therefore excludes capital expenditure and incorporates financial consolidation adjustments and accruals.

2. The Purchase to Pay team supports business operations from master data maintenance to the purchasing and payment of goods and services.

3. Oyu Tolgoi’s (OT) national procurement figure represents spend with suppliers registered in Mongolia and more than 50% owned by Mongolian citizens. It relates to the OT operations only and does not include the underground project.

4. Based on payments committed to suppliers in 2021.
Our operating and sourcing locations

Top 10 sourcing countries
Australia, Canada, China, Germany, Japan, Mongolia, Singapore, South Africa, United Kingdom and United States

90% of contestable spend is in the top 10 sourcing countries.

80% of total spend in 2021 was for contracted labour and facilities management, mining equipment, professional services, fuel and energy, and logistics.

Key:
Our sourcing: Top 10 countries
Our operations:
- **Aluminium**
- **Copper**

1. These countries are where our suppliers are registered; we recognise that this does not always represent the country of origin of goods or services.
2. Contracted labour and facilities management includes items such as cleaning, waste removal, building maintenance and security services.
3. Professional services include items such as technology, consultancy and travel.
4. Production consumables include items such as explosives, raw materials and chemicals.
Modern slavery risks are global. They may arise due to the social and political context where we work and source from; the nature of the products and services we procure; and the specific entities we engage with. As such, our modern slavery risk profile is continually evolving.

In this section, we set out our 2021 risk profile through identifying risks of modern slavery and related labour exploitation risks in our business and supply chains. The resources we use to identify these risks are detailed in Section 4.

**Risks in our business**

We have considered the situations where we could be involved in modern slavery through our business based on our understanding of our sector and where we work. These include:

- We could be at risk of *causing* modern slavery if, for example, we employed people in exploitative conditions; engaged younger workers (such as apprentices) in hazardous work; or otherwise impacted workers’ freedom to stop working including in connection with limiting their movement.

- We could be at risk of *contributing* to modern slavery if, for example, our people enabled or facilitated the engagement of exploited people in a local community (such as for domestic work or sex work); or if we were to include production targets in our joint venture agreements that could create a risk of worker exploitation and we did not take steps to mitigate such risks.

- We could be at risk of being *directly linked* to modern slavery if, for example, a joint venture partner, customer or other partner had modern slavery in an area of their business directly linked to the work we were doing with them or the goods we were supplying them.

We have operations, projects and offices across around 35 countries. We review the different levels of modern slavery risks in these countries by referencing a wide range of external sources (see Section 4).

In 2021, 11 countries in which we have operations, projects and offices fell within the higher risk country classification as identified in our labour rights risk assessment described in Section 4.

We consider there to be a lower risk of our involvement in modern slavery relating to our workforce and local communities, due to our Group-wide human resources and communities and social performance governance and controls. More information on our approach, including our human resources and communities and social performances processes, is outlined in Sections 3 and 4.

We recognise that during 2021 there was a range of other human rights impacts identified in relation to our business that we are working to address.

**Risks of involvement in modern slavery**

Managing modern slavery risks is part of our broader human rights approach, recognising that the presence of other human rights issues such as working conditions, discrimination, freedom of association or other labour exploitation may indicate modern slavery and vice versa. Our human rights approach is founded on the UN Guiding Principles on Business and Human Rights (UNGPs) – the global standard for preventing and addressing adverse impacts on human rights by business.

In identifying and understanding our modern slavery risks, we draw on the “continuum of involvement” established in the UNGPs which provides that:

- A company may cause a human rights impact if its own actions or omissions directly result in that impact.
- A company may contribute to a human rights impact if its actions or omissions contribute to another party (or parties) causing the impact (eg by facilitating, enabling or incentivising it).
- A company may be directly linked to a human rights impact by another entity it has a business relationship with, through its products, services or operations.
Risks in our supply chains

We have also considered the situations where we could be involved in modern slavery through our supply chains based on our understanding of our sector and where we work. These include:

– We could be at risk of contributing to modern slavery through our conduct, including if we were to engage in irresponsible buying practices (such as putting unreasonable time or cost pressures on suppliers); and
– We could be at risk of being directly linked to modern slavery at multiple tiers of our supply chain through our products, services or business (including our operations and projects).

While we have prioritised mitigating risks relating to our direct suppliers, this Statement also highlights how we have started to assess risk beyond our direct suppliers and encourage our suppliers to conduct due diligence on their supply chains.

Through our labour rights risk assessment, we have identified categories of goods and services and countries at high risk for labour exploitation, including modern slavery. Risk factors often combine to make these categories and countries higher risk for modern slavery, such as widespread use of migrant workers, complex and fast-moving supply chains, strong pricing competition and, in some jurisdictions, weaker governance. See Section 4 for further information on our labour rights risk assessment and how the identified high-risk categories and countries have been embedded in our know your third party procedure.

Category risk

Our risk segmentation approach (described in Section 4) identified the following goods and services categories as the top ten higher-risk categories:

– Cleaning and waste removal services
– Catering services
– Construction services
– Temporary labour
– Building and grounds maintenance services
– Transport (including shipping – see case study in Section 4 – and trucking) and warehousing services
– Security services
– Uniforms and personal protective equipment
– Computer equipment and electronics
– Building products

New and emerging risks can occur outside our defined high-risk categories, which we respond to on a case–by–case basis. We describe supplier-specific risks identified through our third-party due diligence process in Section 4.

Country risk

Modern slavery can occur in every country. However, to prioritise our actions, our labour rights risk assessment (described in Section 4) identified a targeted list of 28 higher-risk countries where our suppliers operate in or are incorporated; representing 10% of our contestable spend. The ten highest-risk countries represent 0.6% of our contestable spend in 2021.

Our Third-Party Due Diligence (TPDD) team maintains systems classifying country risk and monitor country risk classifications throughout the year based on external developments. More information is available in Section 4.

Our Marine function is identifying and acting on risks

Chartering vessels to transport mined and refined materials can involve a range of potential modern slavery and other human rights risks. The COVID-19 pandemic exacerbated these risks, including by delaying or restricting crew changes. We continued to monitor this risk in 2021 and actively collaborated across our shipping value chain to facilitate crew changes across our owned and chartered fleet, well within the requirements of the Maritime Labour Convention (MLC). We also continued to support the Global Maritime Forum’s Neptune Declaration on Seafarer Wellbeing and Crew Change. The Declaration recognises the shared responsibility between ship operators and charterers to facilitate crew changes, including not using “no crew change” clauses in charter contracts and implementing high-quality health protocols to minimise the risk of COVID-19.

We undertook a gap analysis of our Marine function’s strategy on safety and welfare against key external human rights commitments and industry-leading practice. We plan to implement the recommendations over a three-year time frame. More information is in Section 4.

During the year, we also addressed food shortages and supported the health of the crew on a ship chartered by a bauxite customer that had been detained by the Australian Maritime Safety Authority.

In 2021 we provided input into the Sustainable Shipping Initiative and Institute for Human Rights and Business’ voluntary Code of Conduct for Delivering on Seafarers Rights. The Code and a related self-assessment tool were launched in October 2021 to improve industry performance to protect seafarers’ human rights. Our gap analysis recommendations noted above consider opportunities for us to implement and support the Code.

Our modern slavery risk profile continued
3. Governance and policies

At Rio Tinto, everyone has a role in avoiding our involvement in modern slavery, including knowing how to identify and report concerns.

The Board Sustainability Committee supports and monitors the sustainability performance of our business. This includes oversight of sustainable development issues as they relate to suppliers and supply chains, including modern slavery, and human rights monitoring and issue management.

Our Executive Committee has cross-functional and multi-product group accountability for managing modern slavery risks. This includes management of the functions responsible for our overall human rights approach and broader communities and social performance; third-party due diligence, business integrity and external stakeholder engagement; projects; procurement; sales and marketing; and marine and logistics, led respectively under the leadership of Chief Executive Australia, Chief Legal Officer & External Affairs, Chief Technical Officer and Chief Commercial Officer.

Human Rights specialists in our Communities and Social Performance Area of Expertise have day-to-day oversight of our overall human rights approach, including in relation to modern slavery and supporting functions and product groups as they implement our commitments.

Governance documents

Our workforce must follow our policies, standards and procedures, several of which set expectations around preventing modern slavery, including our global code of business conduct The Way We Work, human rights policy and employment policy. In all of these documents, we reject any form of child labour or slavery and prohibit the use of forced or bonded labour. Suppliers are required to follow our policies and standards in some instances, as set out below.

The table below provides further information on governance documents and other controls – including contractual clauses – relevant to our modern slavery approach, and how these are being implemented. Our governance documents are regularly reviewed and updated; you can read more about our corporate governance framework and structure on our website.

<table>
<thead>
<tr>
<th>Governance document</th>
<th>Overview and relevance to modern slavery</th>
<th>Key implementation actions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The Way We Work</strong></td>
<td>The Way We Work is our global code of business conduct, explaining how we should behave in accordance with our values of care, courage and curiosity. It includes our commitment to respect human rights and operate consistently with the UNGPs. The Way We Work outlines our expectation that suppliers adhere to the same human rights standards as we do, that we work hard to ensure that slavery or child labour is not taking place in our business and that our supply chains comply with international standards. It also encourages people to report any breaches of the law, or our policies and standards, including through our whistleblowing service myVoice.</td>
<td>The Way We Work is available on our website and intranet. The Way We Work is provided to potential employees during the offer process and is included in induction material for our people. Our supplier contracts used by our procurement team ask our suppliers to comply with The Way We Work.</td>
</tr>
<tr>
<td><strong>Human rights policy</strong></td>
<td>Our human rights policy articulates our commitments and how we implement them based on the Universal Declaration of Human Rights (UDHR), UNGPs and other key standards and frameworks. It specifically outlines our rejection of any form of slavery, forced or child labour. The policy also sets expectations of third parties including suppliers (see Supplier code of conduct and Supplier contracts), marine partners and joint venture partners (see Joint venture policy). In 2021 we reviewed our human rights policy, and an updated human rights policy will be published in 2022 (see Section 8).</td>
<td>Our human rights policy is publicly available on our website and our intranet. We expect our consultants, agents, contractors and suppliers to respect internationally recognised human rights and promote compliance via our SCOC and contractual arrangements. More information on our human rights training is provided in Section 5.</td>
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<tr>
<td>Employment policy</td>
<td>Our employment policy outlines our expectations for safe and healthy working environments for our employees and an expectation that people are treated with dignity, fairness and respect. It states that we implement equitable and transparent remuneration and incentive systems and recognise everyone’s right to choose whether or not they wish to be represented collectively. The policy states that we do not employ forced, bonded or child labour.</td>
<td>Our employment policy is available on our website and intranet. We undertake an annual remuneration review to check that our people are being paid appropriately to their position and at a minimum in line with the legal minimum wage. While we do not have a public commitment to a living wage, we regularly monitor our pay against local/ regional and national economic and labour conditions. Our measures to mitigate the risk of modern slavery and labour exploitation of our people include: – Having processes to assess that we are working with reputable recruitment agencies; – Not requiring recruitment fees to be paid to Rio Tinto by our people, and paying all recruitment fees where we work with third-party recruiters; – Not holding original copies of anyone’s passport; – Preventing hiring without the appropriate work rights and skills checks being completed, including through strong controls and regular audits; – Complying with applicable laws, including in relation to working conditions; – Providing all employees with a written contract setting out the terms and conditions of their employment.</td>
</tr>
<tr>
<td>Joint venture policy</td>
<td>Our joint venture policy outlines our expectations for joint venture partners (including non-managed operations) to support our corporate commitments and core principles as laid out in <em>The Way We Work</em>. This policy states that we strive to ensure our joint venture partners and the non-controlled companies in which we participate respect our commitments to uphold human rights.</td>
<td>We share our expectations about human rights with joint venture partners through appropriate contractual arrangements and engagement protocols, and we screen all new joint venture partners for human rights under the KYTP procedure. Our governance of managed and non-managed joint ventures involves annual attestation certification signed by the Rio Tinto lead responsible for overseeing the relationship with the joint venture. More broadly, we look for ways to help joint venture partners respect human rights. At non-managed operations, this may include best practice sharing around complaints handling, discussing human rights issues at joint management meetings and making our Human Rights specialists available to build capacity.</td>
</tr>
<tr>
<td>Know your third party procedure (KYTP)</td>
<td>Our KYTP procedure sets out mandatory processes to assess the risks – including human rights risks (such as modern slavery) – relating to third parties we engage with such as our customers, suppliers, contractors and joint venture partners. It is described in more detail in Section 4.</td>
<td>In 2021, we rolled out the KYTP procedure to key internal stakeholders through internal communication and management updates, online training and supporting guidance. The KYTP programme is managed by a dedicated Business Conduct Office (BCO) reporting to the Chief Legal Officer &amp; External Affairs. The myVoice procedure is available on our Ethics &amp; Compliance webpage, which also links to the myVoice portal. The myVoice portal explains how users can report concerns online, or by calling the myVoice hotline or emailing our BCO. See Section 6 for more information on how we track modern slavery-related complaints.</td>
</tr>
<tr>
<td>myVoice procedure</td>
<td>Our myVoice procedure (launched in March 2021) provides guidance about how to voice concerns relating to Rio Tinto using our confidential reporting programme myVoice (see Section 6). myVoice is a confidential reporting mechanism designed to help people voice concerns (including complaints) about potential misconduct or improper behaviour – including relating to modern slavery or other human rights concerns, myVoice is available to our people, suppliers (and their employees and contractors), community members, other stakeholders and the public.</td>
<td>The myVoice programme is managed by a dedicated Business Conduct Office (BCO) reporting to the Chief Legal Officer &amp; External Affairs. The myVoice procedure is available on our Ethics &amp; Compliance webpage, which also links to the myVoice portal. The myVoice portal explains how users can report concerns online, or by calling the myVoice hotline or emailing our BCO. See Section 6 for more information on how we track modern slavery-related complaints.</td>
</tr>
</tbody>
</table>

1. Passports are under the Master’s care on Rio Tinto owned vessels in line with industry practice and are available upon request.
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td><strong>Supplier code of conduct (SCOC)</strong></td>
<td>Our SCOC sets out our expectations of suppliers (and their subsidiaries and subcontractors) with respect to key issues, including human rights. The SCOC draws on internationally recognised standards (for example, the UDHR)) and The Way We Work. The SCOC states that all work must be freely chosen and completed without the use of forced or compulsory labour. It mandates that all workers be of local legal age and prohibits the use of child labour. It sets an expectation that suppliers maintain policies and practices to allow violations, misconduct, or grievances to be reported by workers and addressed without fear of retaliation. It also highlights that we work with suppliers who share our commitment by encouraging their subcontractors to also adopt and promote the commitments in it.</td>
<td>Our SCOC is available on our website in five languages. It is provided to prospective suppliers and regularly referenced in discussions with existing suppliers. We will be updating our SCOC in 2022, including human rights (such as modern slavery) considerations (see Section 10). Our purchase order terms and conditions and Procurement global supply contract incorporate the SCOC and allow us to terminate supplier relationships for non-compliance. We may develop targeted human rights capacity building for certain suppliers, including support for local suppliers. Suppliers to Rio Tinto and their workers have access to myVoice to report concerns or misconduct directly to us and we encourage them to report non-compliance directly with the SCOC.</td>
</tr>
<tr>
<td><strong>Supplier contracts</strong></td>
<td>Our Procurement global supply contract and purchase order terms and conditions, as well as our Marine chartering contract, include modern slavery provisions (see additional information in our 2019 and 2020 Modern Slavery Statements). Our standard suite of contracts for use in major capital projects was updated in 2020 with modern slavery provisions, including expectations that contractors will take reasonable steps to put in place adequate policies and procedures to address their modern slavery risks and an audit right.</td>
<td>We may discuss our modern slavery provisions with suppliers during contract negotiation. In line with the KYTP procedure, we may also review and monitor a supplier’s modern slavery-related policies and processes.</td>
</tr>
<tr>
<td><strong>Communities and social performance standard</strong></td>
<td>Our communities and social performance (CSP) standard defines how we engage communities and outlines the steps we take to identify and manage social, economic, cultural and human rights impacts. It applies to all our businesses and managed operations. The standard requires that all our businesses have a mechanism for community complaints and grievances that meets the intent of the UNGPs, and that they include human rights issues in social risk analyses and impact assessments. Related guidance notes explain how to do this in practice, including how modern slavery should be considered.</td>
<td>Our CSP standard is publicly available on our website and our intranet. We measure, monitor and review our communities and social performance against targets, to help us continuously improve. This includes reporting and communicating on how we are addressing human rights impacts, both positive and negative. Compliance with our CSP standard is incorporated into agreements with major contractors. In 2021 we conducted an extensive review of our CSP standard which will be submitted for approval in 2022. More information on how we train our communities and social performance practitioners, how we report on communities and social performance incidents, and audit compliance with the standard is available in Sections 5, 6 and 8.</td>
</tr>
<tr>
<td><strong>Group procurement standard</strong></td>
<td>Our Group procurement standard was updated in December 2021. It requires new and renewing suppliers to be subject to the KYTP procedure.</td>
<td>The standard is available on our intranet.</td>
</tr>
</tbody>
</table>
4. Identifying, assessing and addressing our modern slavery risks

We aim to continuously improve governance, systems and processes to better identify and assess modern slavery risks across our business and supply chains.

Third-party due diligence\(^1\)

Our know your third party procedure (KYTP) provides the overarching due diligence process for our third-party risk management across our business and supply chains. The procedure is designed to identify a variety of responsible business conduct risks, including human rights (such as modern slavery), sanctions, and bribery and corruption.

All third parties are subject to baseline screening, including for sanctions and regulatory enforcement. Additional due diligence may be undertaken if the third party is engaging in high-risk activities; is incorporated in or delivering to a designated high-risk, sanctioned or restricted country; and/or the engagement has high value. Third parties in a high-risk country with low value and no high-risk activities may only qualify for baseline screening. Both high-risk activities and countries are identified through lists maintained internally and based on varied sources – see below for additional information.

In 2021, we amalgamated the know your supplier and know your customer procedures into a single KYTP procedure to articulate the mandatory due diligence requirements for third-party engagement, including customers, suppliers, contractors, divestment targets and joint venture partners. The revised procedure also includes additional criteria to address human rights risks (including modern slavery and other labour exploitation) through revised high-risk activities\(^2\) and countries. Resources used for this update included our labour rights risk assessment which had identified high-risk countries and categories for labour exploitation.

To inform our labour rights risk assessment and in maintaining up-to-date high-risk country and activity lists for the KYTP procedure, we consider a range of labour rights indices. These include resources from the Walk Free Foundation, the United Nations and the United States Department of Labor, as well as proprietary audit data from the third-party provider that conducted the labour rights risk assessment. Our KYTP classifications of high-risk countries also consider Conflict Affected & High-Risk areas (CAHRAs), in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

Due diligence reviews

- Suppliers: 78%
- Customers: 14%
- Existing or prospective joint venture partners or other third parties in relation to mergers and acquisitions: 1%
- Other third parties: 7%

12,794 due diligence reviews on third parties completed in 2021


Due diligence reports requested by the following product groups

- Aluminium: 28%
- Commercial: 20%
- Iron Ore: 11%
- Minerals: 11%
- Copper: 10%
- Other, including functions: 10%

~100 third-party due diligence reports

were escalated to Human Rights specialists for review. These reviews included support such as testing the rating given to the third party based on the TPDD report findings, providing advice on mitigation actions and facilitating further human rights due diligence.

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1. The KYTP procedure is applicable to all Rio Tinto business units and functions and to managed joint ventures (where contractually agreed). It can also extend to reviewing recipients of donations and sponsorships. Legally required tax or other statutory payments to government authorities, payments to employees (such as expenses) and credit card transactions are generally not currently subject to third-party due diligence.

2. Note that under the KYTP procedure, the high-risk categories identified in the labour rights risk assessment are known as high-risk activities and include the provision of both goods and services.
Our business

We identify and assess modern slavery risks across the product lifecycle from exploration and construction to operations and closure.

We integrate human rights considerations, including modern slavery, into sites’ risk management processes, site-based social risk and impact assessments, incident reporting and audits, and security assessments. Our social risk analysis guidance note recommends all sites consider forced labour and child labour risks. Aligned with the Voluntary Principles on Security and Human Rights, we undertake site-specific security risk assessments, which include reviewing and raising awareness of modern slavery risks.

Our risk management framework includes human rights categories, including labour rights-related risks. In 2021, we updated our internal human rights consequence descriptions and human rights taxonomy in the Rio Tinto Risk Evaluation Scheme. The updated consequence descriptions are aligned with the UNGPs’ concept of “severity” of human rights impacts (i.e., scale, scope and irremediability), supporting an assessment of human rights consequences that is based on risk to people (rather than risk to the company which would be considered in other risk consequences). The updated human rights risk taxonomy is aligned with our salient human rights issues including modern slavery.

The KYTP procedure complements the consideration of social risks that is a routine part of due diligence for mergers and acquisitions, partnership assessments, divestment targets and joint ventures. The KYTP procedure also defines the risk-based due diligence for customers.

Our salient human rights issues are those where we could have the most severe impacts on people through our own activities or business relationships. Taking into account our operational footprint, value chain and external contexts, we updated our salient human rights issues in 2021. Modern slavery continues to be specifically incorporated under “labour rights” in this list so it is prioritised for action.

Supporting our customers’ due diligence

In 2021, we responded to several customer requests regarding our modern slavery risk management. Challenges included incomplete information about the locations of suppliers beyond our direct suppliers and definitively confirming that there is no modern slavery throughout our entire supply chain (including beyond direct suppliers) as we do not have this visibility. In these cases, we outlined our risk-based approach to supplier due diligence and our commitment to take action in line with the UNGPs and other core international standards.

We continue to be actively involved in value chain initiatives, including the Aluminium Stewardship Initiative (ASI), the Copper Mark and the Responsible Jewellery Council, giving us the opportunity to engage with our customers on key and emerging modern slavery topics.

Our Kennecott and Oyu Tolgoi copper operations have been awarded the Copper Mark, the copper industry’s independently assessed responsible production programme. In 2021, our ISAL smelter in Iceland was certified under the ASI, joining our other certified aluminium assets in Canada, Australia and New Zealand.

Our three Canadian mines – Diavik Diamond Mine, Iron Ore Company of Canada, and Rio Tinto Fer et Titane – are assured under the Mining Association of Canada’s Towards Sustainable Mining programme.
Our supply chains

In this section, we outline our procedures and processes for assessing potential supplier modern slavery risks.

Supplier due diligence

In 2020, we identified a need to assess supply chain risks more systematically to help prioritise action. Our 2020 Modern Slavery Statement describes the processes we undertook to develop our resulting labour rights risk assessment and supplier risk segmentation.

In 2021, we built on the labour rights risk assessment to define our risk-based supplier due diligence approach, with a focus on risk of labour exploitation to people and risk to Rio Tinto. Our approach is captured in our Responsible Sourcing Action Plan. The plan is informed by a cross-functional team including Ethics & Compliance, Procurement, Logistics and Human Rights and continues to evolve.

During the year, we focused our due diligence efforts on new suppliers in high-risk service categories and high-risk countries. In line with our updated KYTP procedure, new suppliers meeting the risk criteria (high-risk activity and high-risk country) are now required to complete an additional component of our TPDD questionnaire – known as the “Approach to Labour Rights”.

The updated TPDD questionnaire replaced our process of requesting labour policies from prospective suppliers bringing more than 20 manual labourers onto our sites in high or very high-risk countries. In line with our updated KYTP procedure, new suppliers meeting the risk criteria (high-risk activity and high-risk country) are now required to complete an additional component of our TPDD questionnaire – known as the “Approach to Labour Rights”. The questionnaire process clarifies expectations to prospective suppliers based on the SCOC and allows our teams to have meaningful exchanges with suppliers on labour rights risk management.

In 2021, we also piloted an adapted questionnaire for a small number of existing suppliers in high-risk services categories and high-risk countries. Further information is provided in a case study on page 16.

Reflections from the TPDD team on our new “Approach to Labour Rights” questionnaire

Our TPDD team believes that the additional “Approach to Labour Rights” component of the TPDD questionnaire has improved their capability to assess labour rights, including modern slavery risks. In particular, it provides more visibility of smaller or local suppliers that may not typically have had risks identified via the standard TPDD screening methodology. Our TPDD team is also seeing an increased number of suppliers requiring further specialist human rights review of their labour rights risk management. In some cases, this has extended turnaround times for due diligence reports. See Section 10 for our plan to address these challenges.

Human rights risks, including modern slavery risks, may also be identified through the KYTP procedure outside of the TPDD questionnaire process. For example, public allegations against a supplier may be identified in media checks done as part of the TPDD report.

Regardless of how the risks are identified, the TPDD team escalates any human rights concerns to our Human Rights specialists. Our Human Rights specialists work with the TPDD team and the supplier relationship owner to recommend and agree on an appropriate response, including any mitigation actions. We prohibit engagement with “very high” risk suppliers. In cases where an existing supplier has an updated risk rating to “very high” risk, the KYTP procedure requires us to take steps to terminate the relationship.

For new suppliers rated “high” or “medium” risk, the business may decide not to proceed based on the risk profile. Where an existing supplier has an updated risk rating to “high” or “medium”, our preferred approach is to work with suppliers to address human rights risks; terminating a relationship is generally our last resort. However, where risks cannot be sufficiently mitigated through our leverage, or where the supplier refuses to provide information or provides incomplete or inaccurate information to support our human rights due diligence, we will consider terminating the relationship.

In 2021 we did not identify any “very high” risk suppliers in relation to modern slavery. In 2021, we recorded 15 human rights-related “high” risk ratings from TPDD reports relating to nine direct suppliers (and in two cases their local subsidiaries) and four subcontractors for direct suppliers (compared to zero in 2020, and two in 2019). More information on these ratings is provided in the sub-sections on direct suppliers’ findings and subcontractor findings on the next page.
We conducted additional human rights due diligence for the seven suppliers regarding the allegations detailed above. Depending on the supplier, this included actions such as requesting the supplier to formally respond to the allegation(s), reviewing any public supplier responses to the allegations, reviewing the supplier’s policies and processes to manage the alleged risks and mapping the supplier’s supply chain.

Where we proceeded with the relationship, we did so either because our due diligence could not substantiate the allegations and/or it found the supplier appeared to have appropriate controls to manage the risks. In some cases, we also included mitigation actions such as ongoing monitoring.

We also conducted additional human rights due diligence for the two cases of historical incidents detailed above. This included attempting to understand how the suppliers responded to the incident and the controls they have in place or would implement to prevent similar incidents. With respect to the supplier we decided to proceed with, we were satisfied they had sufficient controls to prevent further incidents.

### Direct suppliers’ findings

The table below provides a high-level summary of the human rights-related, high-risk ratings concerning our TPDD screening on new and existing direct suppliers in line with our KYTP procedure in the reporting period.

<table>
<thead>
<tr>
<th>Goods or services supplied</th>
<th>Region</th>
<th>Risk overview</th>
<th>Status as at end of 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Security services (parent company and local subsidiaries)</td>
<td>Latin America</td>
<td>Allegations of human rights violations, including labour rights violations (allegations of anti-union retaliation by the supplier)</td>
<td>Proceeding with mitigation actions</td>
</tr>
<tr>
<td>Security services</td>
<td>Asia Pacific</td>
<td>Allegations of human rights violations, including labour rights violations (allegations of sexual harassment and other labour issues)</td>
<td>Proceeding with mitigation actions</td>
</tr>
<tr>
<td>Security services</td>
<td>Africa</td>
<td>Allegations of human rights violations</td>
<td>Due diligence in progress</td>
</tr>
<tr>
<td>Drilling services</td>
<td>Europe</td>
<td>Allegations of exploitation and discrimination</td>
<td>A decision was made not to proceed with the supplier due to high-risk rating</td>
</tr>
<tr>
<td>Capital purchase</td>
<td>Asia Pacific</td>
<td>Allegations of forced labour in the supplier’s supply chain</td>
<td>Proceeding with mitigation actions</td>
</tr>
<tr>
<td>Capital purchase</td>
<td>Asia Pacific</td>
<td>Allegations of forced labour in the supplier’s operations</td>
<td>Due diligence in progress</td>
</tr>
<tr>
<td>Capital purchase (parent company and local subsidiary)</td>
<td>Asia Pacific</td>
<td>Allegations of forced labour in the supplier’s supply chain</td>
<td>Due diligence in progress</td>
</tr>
<tr>
<td>Security services</td>
<td>North America</td>
<td>Historical labour rights incident</td>
<td>A decision was made not to proceed with the supplier due to high-risk rating</td>
</tr>
<tr>
<td>Raw materials</td>
<td>Latin America</td>
<td>Historical labour rights incident</td>
<td>Proceeding with mitigation actions</td>
</tr>
</tbody>
</table>

We conducted additional human rights due diligence for the seven suppliers regarding the allegations detailed above. Depending on the supplier, this included actions such as requesting the supplier to formally respond to the allegation(s), reviewing any public supplier responses to the allegations, reviewing the supplier’s policies and processes to manage the alleged risks and mapping the supplier’s supply chain.

Where we proceeded with the relationship, we did so either because our due diligence could not substantiate the allegations and/or it found the supplier appeared to have appropriate controls to manage the risks. In some cases, we also included mitigation actions such as ongoing monitoring.

We also conducted additional human rights due diligence for the two cases of historical incidents detailed above. This included attempting to understand how the suppliers responded to the incident and the controls they have in place or would implement to prevent similar incidents. With respect to the supplier we decided to proceed with, we were satisfied they had sufficient controls to prevent further incidents.

### Subcontractor findings

Our KYTP procedure requires known subcontractors or sub-agents to complete baseline screening. Where the supplier is using subcontractors or sub-agents to perform a significant amount of work on their behalf, further due diligence may be required.

In 2021, our due diligence recorded four "high" risk ratings for subcontractors in relation to allegations of forced labour in their operations or supply chain. Additional human rights due diligence on three of the allegations was still being finalised at the end of 2021.

We are proceeding with one subcontractor as our review could not substantiate the allegations and the subcontractor appears to have the controls in place to manage the identified supply chain risks. Our supplier is required to monitor the subcontractor and keep us informed of any risks.
Procurement risk assessments

In late 2021, we updated our procurement sourcing risk assessment (conducted as part of our sourcing strategy to procure an identified need) to consider the TPDD high-risk activities (referred to as high-risk service categories). A secondary full risk assessment is triggered where this assessment identifies a high-risk activity.

In some higher-risk locations, our Procurement teams will also include a supplier self-assessment process as part of their supplier prequalification process, in addition to the KYTP procedure. This may cover a range of issues, including several potential modern slavery indicators. For example, at one of our sites, the prequalification process requests information on suppliers’ policies on retention of identity documents, and at another site, suppliers must confirm if they have policies regarding non-discrimination. Prequalification outcomes inform whether to proceed with the supplier and ongoing monitoring requirements.

Supplier monitoring including audits

We may decide to inspect or audit a supplier’s premises and/or records at different stages of our relationship. This includes situations when we identify risks as part of the KYTP procedure, as part of prequalification in some locations or if issues arise during the term of the contract.

In line with the KYTP procedure, once a TPDD report has been completed, the supplier will be subject to ongoing automated monitoring on regulatory and sanctions issues. The TPDD team will review the identified updates and inform the relevant business unit or function if there are any material changes to the initial findings that may alter the third party’s risk classification. The relevant business unit or function is accountable for overall monitoring of the relationship.

Responsible sourcing self-assessment questionnaire (“SAQ”) pilot

In 2020, we segmented suppliers to prioritise our due diligence activities. In 2021, based on the segmentation results, we introduced additional screening for our “priority” segment (high-risk country and high-risk services category) for new suppliers.

To test an effective approach for existing suppliers in our “priority” segment, a cross-functional team developed a pilot SAQ programme starting with a small cross-sample representing various spend profiles, categories and countries. The SAQ and support documents were translated into local languages. Briefing sessions and support material were provided to relevant Procurement teams with information on the importance of the SAQ and its objectives and clarified their role in supporting suppliers through the SAQ process. Support documents provided to participating suppliers included FAQs, links to key Rio Tinto resources such as our SCOC and external resources on international human rights standards.

The SAQ covers a range of labour rights-related questions, including asking if there are policies or processes in place to ensure all work is freely chosen and can be left freely by employees, with related follow-up questions on specific risk indicators such as recruitment fees.

Initial results suggest the SAQ supports supplier engagement, but there are also limitations. Suppliers can be reluctant or may not have the capability to complete the SAQ or to provide sufficient information for us to identify risks. However, the SAQ is an important starting point and will be supplemented with further due diligence.

The pilot results will inform our Responsible Sourcing Action Plan (see Section 10).
Our key steps for identifying and assessing human rights, including modern slavery, risks relating to our shipping partners are:

- All vessels calling at our terminals must be Rightship vetted. In May 2021, Rightship strengthened their human rights criteria to consider vessels with historical human rights abuses, poor living or working standards, gross failings of rights and employment terms and ILO abandonment cases.

- A combination of both Rightship and internal inspections are conducted on vessels across our fleet based on age, performance and charter type to confirm standards on board meet our expectations.

- In 2021, as part of our regular internal inspection programme, we conducted an estimated 250 first and third-party on-board audits\(^2\) on vessels calling at our ports, reviewing living and working conditions. Also in 2021, we increased resourcing in Montreal to support our ports in Canada to align with the resourcing model supporting our ports in Western Australia, Gladstone and Weipa.

- We monitor the length of time crew are on board our time chartered vessels and work with the vessel owner to change crew before 11 months in line with the MLC. For spot chartered vessels, we confirm with the vessel owner that the crew has been on board for less than 11 months prior to chartering. In some jurisdictions, due to COVID-19 restrictions crew changes still cannot happen; in these exceptional cases we will accept a vessel which has crew over 11 months provided the vessel owner confirms the crew are to be changed at the next port. This approach is the best option to get the crew changed as quickly as possible.

We recognise the challenges posed by monitoring conditions on vessels chartered by business partners (including customers, suppliers and joint venture partners) and look for opportunities to encourage meaningful due diligence by our business partners. Our contracted shipping agents are assessed in line with our KYTP procedure and they are required to comply with our policies and standards. During 2021, we implemented a new process requiring our shipping agents to complete annual ethics and integrity training online which focuses on business integrity and refers to our SCOC and TWWW. In relation to our customers’ nominated local agents, in 2021 we implemented enhanced due diligence checks that are conducted by a third party in line with our KYTP procedure.

### Marine dry docking due diligence

Dry docking in shipyards is a regulatory requirement and critical for the maintenance of our own vessels. However, a range of labour rights risks, including modern slavery, may be associated with shipyard work given risk factors. For example, workers may be exposed to health and safety risks and due to the cyclical nature of the work, companies may employ temporary or short-term contract labour through labour agencies which may have exploitative practices. Also, some shipyards may be located in regions known for weaker governance on labour rights standards. During 2021 we undertook due diligence, including in relation to modern slavery, to select our dry docking business partners.

As an initial step, we conducted a remote and physical audit of the shipyards across multiple countries to pre-qualify prospective suppliers to participate in the request for proposal process. This was a comprehensive process assessing shipyards on a range of criteria, including human rights. The human rights element of the audit reviewed policies and processes on key risk areas such as forced labour (including through questions around recruitment processes), child labour, discrimination and harassment and access to a confidential grievance mechanism.

The human rights responses were reviewed by our Human Rights specialists. The engagement with the shipyards enabled us to set expectations of the shipyards around modern slavery risk management and highlighted the importance of discussing modern slavery risk management at prequalification.

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1. Approximately 230 marine vessels, which includes our own and chartered vessels, transport our products at any one time.
2. The 250 audits do not include Rightship inspections.
5. Training and capacity building

Our people are our first line of defence in managing modern slavery risks. They need to understand the red flags and how to report concerns.

This is especially the case for our people who are most likely to be exposed to higher risks, either because of their role or because they are working in a higher-risk location. We use a variety of different forums and tools to raise awareness and capacity.

The table below outlines our training offerings in 2021. See Section 10 for our training plans for 2022 and beyond as we continue to evolve our human rights training.

2021 Training

<table>
<thead>
<tr>
<th>Training Area</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Group-wide human rights training</strong></td>
<td>Our online Group-wide human rights training programme includes information on labour rights, including modern slavery.</td>
</tr>
<tr>
<td><strong>Training for communities and social performance practitioners</strong></td>
<td>In 2021 we regularly provided face-to-face training to our communities and social performance practitioners (CSP) including information on modern slavery. In 2021, we provided training to 109 colleagues in nine countries.</td>
</tr>
<tr>
<td><strong>Security online training</strong></td>
<td>In 2021 our training course in line with the Voluntary Principles on Security and Human Rights (VPSHR) was mandatory for all private security personnel, including Rio Tinto security personnel, and provided to public security providers. In 2021, this training was updated to include a modern slavery module. More information is available on our website and our annual report on VPSHR implementation.</td>
</tr>
<tr>
<td><strong>Procurement training</strong></td>
<td>In 2021 our mandatory human rights online training for our Procurement and Logistics functions included information on modern slavery. The training includes a recording of an awareness-raising webinar conducted four times in 2021 across different time zones that featured an interview with a Procurement representative to demonstrate how key commitments are applied in practice. It also includes an online assessment which in 2021 was completed by 70% of Procurement and Logistics (491 out of 700). Feedback provided on this training was positive, with 80% rating the training 5/5.</td>
</tr>
</tbody>
</table>
| **Marine training**                               | In 2021 our Human Rights specialists conducted a human rights webinar for our Marine function. This included red flags for identifying modern slavery. In 2021 we also conducted human rights awareness-raising with Anglo-Eastern and ASP Ship Management Singapore Pte Ltd which manage Rio Tinto owned vessels. Ship managers are key business partners, and regular engagement on our human rights expectations is important. Following these sessions, we are considering implementing several measures including:  
  - incorporating human rights into mandatory crew induction training;  
  - supporting our ship managers to review modern slavery risks in the goods and services they use on or related to Rio Tinto owned vessels;  
  - further strengthening due diligence to check crew are of the local legal age and not working against their will; and  
  - evaluating survey options to measure seafarer wellbeing onboard.  
  Our ship manager Anglo-Eastern said: "The session provided clarity on the involvement and expected actions of the shore management towards protecting human rights of the seafarers, with examples ranging from crew interactions to supply management. Anglo-Eastern, also a signatory of the Neptune Declaration, is completely aligned with the commitment of Rio Tinto towards operating with the UN Guiding Principles on Business and Human Rights and beyond MLC compliance." |
| **Sales & Marketing training**                    | In 2021 we conducted webinars to increase awareness of higher-risk customer categories relating to modern slavery and related due diligence requirements, and the importance of addressing customer expectations on human rights, including modern slavery. The webinars included interviews with Sales & Marketing General Managers, with one commenting that: "This training was an opportunity to gain familiarity with and reinforce how human rights risks may impact on our work with customers, and what customers may expect of us in managing our human rights risks, including modern slavery." |

**Targets**

In 2021 we developed new Group-wide human rights training targets. We are targeting that by the end of 2024, 100% of employees in high human rights risk roles will complete job-specific and general human rights training annually. By the end of 2026, 100% of employees will complete general human rights training annually. We are planning to include modern slavery awareness-raising in this training, and particularly more targeted training based on job-specific risks.
6. Reporting incidents, grievance mechanisms and remediation

If a human rights incident occurs despite our efforts to prevent it, we seek to mitigate the situation in line with our values, commitments, policies and standards.

Where we identify we have caused or contributed to human rights harm, including modern slavery, in line with the UNGPs, we recognise our responsibility to provide for or co-operate in remediation through legitimate processes. We also understand that in line with the UNGPs we may take a role in remediation if we are directly linked to harm through our products, services or business.

Responding to modern slavery

We may learn about a modern slavery allegation in our business or supply chain in different ways – for example through one of our own grievance mechanisms, through a business partner or through other stakeholders such as a civil society organisation, media outlet or workers’ association. The central principle of any response is ensuring individuals are not put at risk of further harm. We are committed to investigating the situation and also recognise that we may need to involve law enforcement.

Depending on what we identify to be our level of involvement, we are committed to providing for or co-operating in remediation, and/or using our leverage with business partners in line with the UNGPs. This work would entail a cross-functional response, escalated to senior leadership as required. See Section 10 for our future plans for a formal modern slavery response plan.

Reporting incidents and issues

Our health, safety, environment, communities and security incident reporting procedure prompts us to record whether a health, safety, environment, community or security incident (including a complaint) has human rights implications. We can then identify which specific human right the incident may have impacted, including through a targeted question relating to labour rights, where modern slavery-related incidents may be included. We are not aware of any recorded incidents relating to modern slavery in 2021.

A range of updates was planned for this system in 2021, which will be piloted and implemented in the coming years. This includes plans to build our people’s capacity to identify and correctly categorise incidents (including complaints) as having human rights impacts. Part of the future implementation phase will include the alignment with myVoice to ensure clear delineation between the two processes.

Other relevant processes include our locally managed employee relations case management system, which tracks a range of labour-related issues that have been investigated and any actions taken in response.

Grievance mechanisms

Our grievance mechanisms are publicly available for any individual to raise complaints relating to our operations and our supply chains, including any concerns about modern slavery.

Site-level grievance mechanisms

Our CSP standard requires managed sites to have a local level complaints and grievance procedure in line with the UNGPs’ effectiveness criteria for non-judicial grievance mechanisms (UNGPs’ effectiveness criteria). We are not aware of any modern slavery complaints to our site-level grievance mechanisms in 2021.

In 2021, our Group Internal Audit reviewed our site-level complaints and grievance mechanisms, including the extent to which they meet the UNGPs’ effectiveness criteria. The review found opportunities for improvement, including in relation to governance and increased community engagement in mechanism design to help meet communities’ needs, especially vulnerable groups.

Follow-up actions include clarifying site-level roles and responsibilities, developing clearer guidance and training on the design and implementation of grievance mechanisms, and improved reporting. See our forward looking commitments in relation to these actions in Section 10.

Our grievance mechanisms are available for any individual to use, including our suppliers. We are considering ways to promote access to our grievance mechanisms to workers within our supply chains, as well as to support our suppliers to strengthen their own grievance mechanisms. By doing this, we are seeking to provide multiple channels for any person who is in a situation of modern slavery to know and be able to access an effective grievance mechanism.
myVoice

In 2021, we launched our enhanced confidential reporting programme, myVoice, a complaints mechanism designed to help people voice concerns about potential misconduct or improper behaviour. myVoice is available in multiple languages to our people, suppliers (and their employees and contractors), community members, other stakeholders and the public. myVoice provides a platform for reporting concerns confidentially or anonymously.¹

Subject to local law, reports to myVoice can relate to concerns about the business or behaviours of individuals, including suspected violations of our standards, policies and procedures, human rights including modern slavery, safety and environmental, financial reporting, fraud or other business integrity issues. The Business Conduct Office (BCO) assesses concerns and selects the appropriate grievance category – this includes categories for unfair labour practices as well as child labour-related complaints.

In 2021, we increased the myVoice programme’s independence and effectiveness through organisational changes and clearly defined governance, responsibilities and accountabilities. The programme is managed by our BCO reporting to the Chief Legal Officer & External Affairs and regularly reports to the Group Ethics & Compliance Committee.

We are seeing an increase in reporting and believe this means that more people are feeling comfortable sharing their concerns. In 2021, we received 1,246 reports through myVoice channels (up from 748 reports in 2020). There was also an increase in substantiation rates.

Issues raised in 2021 broadly relate to personnel, business integrity, information security, safety, health and environment, communities and finance. The personnel cases included issues relating to discrimination, bullying, harassment, sexual misconduct and sexual harassment, employee relations and benefits and compensation. The cases involving suppliers largely related to alleged conflicts of interest between suppliers and employees. We are not aware of any modern slavery-related issues raised via myVoice in 2021. The BCO will continue to increase the awareness and availability of myVoice.

More information on myVoice is available on our designated myVoice website and on our broader Ethics and Compliance webpage.

Our SCOC and The Way We Work encourage employees, contractors and suppliers to report concerns – including breaches of the SCOC or The Way We Work – either directly to their Rio Tinto contact or via myVoice. Suppliers are required under the standard global supply contract to notify us directly if they reasonably suspect an actual or potential breach of our Business Integrity provisions of the contract, including our modern slavery provisions. Our SCOC encourages suppliers to maintain their own policies and practices to allow violations, misconduct or grievances to be reported by workers and addressed without fear of retaliation.

¹. The content reported and the right to anonymity may be subject to local laws.
7. Collaboration and engagement

Combatting modern slavery requires collective, multi-stakeholder action focused on mitigating root causes, building capacity across value chains and providing robust support for survivors.

We encourage government efforts, especially in countries where we have operations, to help businesses prevent and address their involvement in modern slavery. We engage with peers, investors, civil society organisations, workers’ organisations and business partners on issues related to human rights, including in some cases, modern slavery.

Key engagement with stakeholders

**Multi-stakeholder forums**
In 2021 we engaged in the following key forums on a range of human rights, and in some cases, modern slavery issues:
- International Council on Mining & Metals (ICMM)
- UN Global Compact (including the UN Global Compact Network Australia’s Modern Slavery Community of Practice)
- UN Annual Forum on Business and Human Rights
- Human Rights Resources and Energy Collaborative

We also continued to participate in multi-stakeholder whole of value chain initiatives, including as a member of the ASI’s human rights working group.

**Civil society organisations**
Since 2018, we have held annual roundtables with civil society organisations to explore and discuss key social, environmental and economic issues facing society and our business. The roundtables are attended by members of the Board and Executive Committee. In late 2021, we held three virtual roundtables across Australia, Europe and the UK and North America. Various human rights topics were among the issues discussed, including encouragement for Rio Tinto to participate in the upcoming review of the Australian MSA (see Section 10).

Through our community and social performance investment work, aligned with our focus on conducting due diligence in our marine sector, we also provided community investment to the Mission to Seafarers.

**Engaging with worker representatives**
Recognising the links between respect for broader labour rights and preventing modern slavery, we continue to engage with workers’ organisations at local and global levels. This included working sessions with our main union stakeholders, including United Steelworkers, Unifor, National Union of Mineworkers, Construction Forestry Maritime Mining and Energy Union and IndustriALL.

In 2021, we held one meeting with our Industrial Relations Steering Committee, a transnational forum that brings together Rio Tinto representatives, major trade unions and IndustriALL. We also met with regional members of the Steering Committee. The Steering Committee’s 2021 focus was acknowledging Rio Tinto organisational changes and introducing the new Chief People Officer. In 2020 we commenced discussions with the International Labour Organization’s mining sector experts, with the support of IndustriALL leadership, to explore how we could benchmark or share some of our labour rights initiatives. This work was postponed due to COVID-19, but it will continue in 2022.

**Engaging with investors**
We also continued to engage with investors, including responding to investor queries about how we assess and address modern slavery risks, including questions about our policies, how we identify, report and manage modern slavery incidents in the event they occur and our governance structures for considering modern slavery risks.

Learning from peer benchmarking

We have monitored, and raised internal awareness around, various benchmarks developed by a range of stakeholders concerning Modern Slavery Statements in Australia and the UK and have used these to continue to improve our disclosures in this Statement. We are pleased that our 2020 Modern Slavery Statement performed well in the Australian Council of Superannuation Investors (ACSI) and Monash University benchmarks but have identified potential areas for improvement may include increasing the level of detail of our modern slavery risk descriptions and more clearly describing remediation processes.

Each year we participate in the Workforce Disclosure Initiative (WDI) survey. In 2021, we scored higher than the WDI’s “all companies average” for disclosures on key areas relevant to modern slavery, including: workforce wage levels and pay gaps; worker voice and representation; grievance mechanisms and supply chain working conditions. In 2021, we increased our scores on supply chain transparency and responsible sourcing, however scores were lower than the “all companies average” for disclosures.

In 2021 we improved our overall performance in the Dow Jones Sustainability Indices. Identified areas for improvement (relevant to modern slavery) included indicators relating to supplier risk management measures, supply chain risk exposure, human rights assessment and living wage. Some of our results in those areas relate to decentralised reporting around supply chain and human rights impact assessment, but others signpost the need to continually improve our assessment, mitigation and transparency on key issues.

While we have not been included in the Corporate Human Rights Benchmark since 2020, given changes to its annual sectoral coverage, we continue to draw on its extractives sector indicators in evolving our human rights risk management and reporting.
8. Assessing our effectiveness

We consider an effective response to modern slavery as one that identifies current and emerging risk areas and helps us to prevent and address any involvement in harm. Our response seeks to always put the interests of survivors of modern slavery and related exploitation first.

We track and assess the effectiveness of our actions in a number of ways:
– internal tracking, including of due diligence and training activities;
– internal assurance, including certification, internal audits and reviews;
– monitoring our grievance mechanisms; and
– engaging with business partners and other external stakeholders for input and feedback, including through reviewing peer benchmarking.

Tracking our due diligence activities

Tracking the implementation of our KYTP procedure and related processes is a vital part of managing our modern slavery risks. Colleagues receiving a due diligence report with mitigation actions are responsible for their implementation. The ongoing dialogue between our Human Rights specialists and relevant functions and sites on modern slavery continues to help build internal capacity and strengthen the implementation of the KYTP procedure. Enquiries about, and assessment of, third parties that are made by the TPDD team and Procurement specialists are continuing to evolve, particularly in relation to modern slavery risks for new suppliers.

Since we implemented our updated TPDD questionnaire for new high-risk services suppliers mid-2021, in relation to the Approach to Labour Rights component we have begun to track:
– the number of questionnaires with corrective actions identified;
– the number of questionnaires with corrective actions closed out; and
– emerging key risk themes from the questionnaires to develop proactive approaches to risk mitigation.

In addition to our internal tracking, in 2021, we commissioned an external review of our TPDD process to examine current state design and benchmark against leading practices. This work will help streamline and automate processes and better align the level of due diligence with the assessed third party’s inherent risk.

We have three lines of defence to provide assurance that risks, including those relating to human rights, are effectively managed in line with our policies, standards and procedures:

<table>
<thead>
<tr>
<th>Three lines of defence</th>
<th>Responsibilities</th>
<th>Accountability</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st – All operation leaders</td>
<td>Identification, management, verification and monitoring of risks and controls</td>
<td>Management</td>
</tr>
<tr>
<td>2nd – Centre of Excellence, Areas of Expertise and Group functions</td>
<td>Oversight of risks and control effectiveness, design of Group controls, advice on capabilities and objective assurance of compliance with the Group’s policies, standards and procedures</td>
<td>Management</td>
</tr>
<tr>
<td>3rd – Group Internal Audit</td>
<td>Independent objective assurance to evaluate the effectiveness of risk management, internal control and governance</td>
<td>Board and Board committees</td>
</tr>
</tbody>
</table>

First level assurance includes our annual self-assessment and certification of social risks undertaken by each of our product groups (Certification). In 2021, each of our four product groups (Aluminium, Iron Ore, Copper and Minerals) and Commercial completed Certifications. The Certification process is undertaken in close co-operation with our Human Rights specialists. An explanation of our product group structure is available on our website.

Given the nature of our Commercial function’s work, their Certification focused on how we are implementing human rights policies and procedures (including relating to modern slavery) across our Procurement, Logistics and Marine teams. Their Certification was approved by the heads of the Marine, Procurement and Logistics functions, as well as the Chief Commercial Officer.

Our Procurement and Logistics function identified the following opportunities to develop their approach which will be considered in the Responsible Sourcing Action Plan:
– strengthening processes and awareness to support supplier relationship owners to request a third-party due diligence update when there is a change in the risk profile of the third party, such as a new contract award;
– introducing a scheduled auditing programme for high-risk suppliers and targeted supplier capacity-building initiatives;
– strengthening our incident reporting processes; and
– strengthening third-party risk monitoring and ongoing risk mitigation.
Our Marine function identified the following opportunities to develop their approach:

– strengthening our fleet manager contracts to incorporate modern slavery and broader human rights expectations;
– continuing to collaborate to help support improvements to the effectiveness of Rightship’s human rights controls;
– conducting a self-assessment (including in relation to human rights) on our owned vessels; and
– continuing human rights-related training.

These elements are being considered as part of an evolving Marine strategy on human rights, seafarer safety and welfare.

Second line assurance includes periodic business conformance audits which assess site or function compliance with our sustainability standards and procedures. This includes compliance with the human rights section of our CSP standard. None of our 14 business conformance audits that had communities and social performance in scope in 2021 identified modern slavery-related findings. Third line assurance includes reviews by Group Internal Audit. Section 6 discusses a review by Group Internal Audit of our grievance mechanisms.

Incident and grievance management help us to assess our effectiveness by highlighting systemic issues and potential gaps in how they are being managed. Section 6 details these processes and recent updates.

Using certification schemes to help us track our performance

We also actively participate in certification schemes (such as the ASI, under which 20 of our aluminium value chain sites have been certified) and other voluntary initiatives to help us and others to assess our performance on human rights (such as the ICMM Performance Expectations). These help us to assess our practices and identify opportunities for improvement at the Group and asset level. Both the ASI and ICMM initiatives contain indicators on preventing involvement in forced and child labour. In 2021, our engagement with these certification schemes did not identify any gaps or non-conformances relating to modern slavery.
Assessing our effectiveness continued

Performance against key 2021 commitments

We track performance against our annual commitments in our Modern Slavery Statement. This table sets out how we fared against last year’s commitments, highlighting that while we have had significant developments, some elements remain a work in progress.

<table>
<thead>
<tr>
<th>Commitment</th>
<th>Status</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Governance and policies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Update human rights policy</td>
<td>In progress</td>
<td>We reviewed our human rights policy in 2021 for approval and publication in 2022. Approval in 2022 is to allow robust Executive Committee and Board-level dialogue on the updated policy in line with the UNGPs and completion of a full salient human rights issues assessment (see Section 4). The updated policy will be submitted for approval in 2022, for implementation in 2023 (see Section 10).</td>
</tr>
<tr>
<td>Update human rights control framework</td>
<td>In progress</td>
<td>This work is underway (see Section 10).</td>
</tr>
<tr>
<td>Update CSP standard</td>
<td>In progress</td>
<td>The updated standard is being submitted for approval in 2022 (see Section 10).</td>
</tr>
<tr>
<td>Roll out new suite of contracts (which include modern slavery clause) for new projects</td>
<td>In progress</td>
<td>New contracts for all new major capital projects include a modern slavery clause.</td>
</tr>
<tr>
<td>Identifying, assessing and addressing our modern slavery risks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Launch revised supplier risk assessment process, including new KYTP procedure</td>
<td>Completed and ongoing</td>
<td>see Section 4.</td>
</tr>
<tr>
<td>Further refine supplier segmentation process</td>
<td>Completed</td>
<td></td>
</tr>
<tr>
<td>For our Marine function increase resourcing at ports in Canada, formalise audit process, raise awareness about concerns</td>
<td>Completed</td>
<td></td>
</tr>
<tr>
<td>Build further understanding of modern slavery risks relating to temporary labour</td>
<td>Ongoing</td>
<td>Temporary labour is included as a high-risk category in the KYTP procedure and additional due diligence through the TPDD questionnaire is conducted on new suppliers of temporary labour in high-risk countries; see Section 4.</td>
</tr>
<tr>
<td>Training and capacity building</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Update Group-wide human rights training programme</td>
<td>In progress</td>
<td>As noted in Section 10, this work will further progress in 2022 as the updated human rights policy is approved.</td>
</tr>
<tr>
<td>Conduct mandatory online human rights including modern slavery training for all Procurement employees (including Logistics)</td>
<td>Completed</td>
<td>We completed training for each of these teams in line with our 2021 commitments, however, it is important to note that our training is ongoing (see Sections 5 and 10).</td>
</tr>
<tr>
<td>Conduct human rights including modern slavery training with Sales and Marketing teams</td>
<td>Completed</td>
<td></td>
</tr>
<tr>
<td>Conduct modern slavery awareness-raising sessions for Marine employees</td>
<td>Completed</td>
<td></td>
</tr>
<tr>
<td>Assessing effectiveness</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct Group internal audit of human rights policies and processes</td>
<td>In progress</td>
<td>An internal audit of site-level grievance mechanisms was completed in 2021 (see Sections 6 and 8). We will continue to work collaboratively with Group Internal Audit to conduct internal audits over specific elements of the human rights control framework.</td>
</tr>
<tr>
<td>Further work with internal auditors to ensure focus on identifying modern slavery risks, and related training</td>
<td>Ongoing</td>
<td>A member of our Group Internal Audit team participated in the Procurement modern slavery training (see Section 5).</td>
</tr>
<tr>
<td>Consultation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Further engage with reporting entities in relation to modern slavery approach</td>
<td>In progress</td>
<td>We engaged with Queensland Alumina Limited (in 2021) and Energy Resources of Australia Ltd (in 2022) in relation to their modern slavery risks and related approaches (see Section 9). We will continue to engage with them and other reporting entities.</td>
</tr>
<tr>
<td>Further engage Energy Resources of Australia Ltd and Queensland Alumina Limited around their modern slavery risk management and reporting</td>
<td>Completed and ongoing</td>
<td></td>
</tr>
</tbody>
</table>
9. Consultation across our business

In 2021, we engaged product groups, assets and functions on human rights, including modern slavery, in a range of ways, including through:

– business conformance audits;
– communities and social performance and human rights certification processes;
– product group salient human rights issues workshops;
– training activities; and
– discrete human rights-related support, including around supplier due diligence.

These activities help embed our human rights approach across the Group. In addition to our broader day-to-day consultation on modern slavery and human rights issues, we also consulted with our reporting entities and owned and controlled entities to develop this Statement. This consultation process is described below.

This Statement was prepared through cross-functional collaboration, including between Human Rights specialists within the Community and Social Performance Area of Expertise, External Affairs, Communications, Ethics & Compliance, Group Security, Human Resources, Investor Relations, Legal and Commercial (including Marine, Procurement and Logistics and Sales and Marketing). We also obtained third-party feedback, including from five civil society organisations and investor representatives.

Managed reporting entities and other owned and controlled entities

In preparing this Statement, we briefed the boards of the reporting entities under the Australian MSA covered by this Statement on their responsibilities under the legislation (in some cases through a targeted Board presentation or a briefing session). We also provided the opportunity for the Australian reporting entities to review the draft Statement and to attend an information briefing session on the Statement, external trends, assurance and forward commitments for 2022. We also wrote to the boards of other Australian owned and controlled entities (that are not reporting entities) through our Company Secretariat team in order to highlight our modern slavery obligations and commitments, inform them of the Statement and invite questions and input.

Non-managed reporting entities

This Statement is also made on behalf of Energy Resources of Australia Ltd (ERA) and Queensland Alumina Limited (QAL) which are reporting entities under the Australian MSA.

The consultation process also included specific engagement with key personnel at ERA (in 2022 prior to approval of this report) and QAL (in 2021), on their modern slavery risks and relevant policies and procedures to manage those risks, and to identify opportunities for continuous improvement. Their boards were also provided with an opportunity to review a draft of this Statement. To fulfil their reporting obligations under the Australian MSA, additional information is provided in relation to both entities’ modern slavery approaches, including noting where these entities follow key Rio Tinto policies and procedures and key differences in approaches.

ERA

ERA, which is 86.3% owned by Rio Tinto, operated the Ranger uranium mine located in the Northern Territory of Australia, and produced uranium oxide for the global nuclear energy market. ERA ceased mining and processing activities in the Ranger Project Area in January 2021. ERA is progressively rehabilitating the Ranger site with final rehabilitation to be completed between 2027 and 2028. The rehabilitation stage includes a range of key activities including infilling of pits, tailings dam remediation and rehabilitation of landforms. As at 31 December 2021, ERA employed 204 people, including 150 employees and 54 category 1 contractors.

During the reporting period, ERA’s total spend was A$220 million with 430 suppliers located in five countries. The main categories of spend were diesel fuel, accommodation services, labour, equipment maintenance and engineering services. In early 2022, Rio Tinto’s Human Rights specialists engaged with ERA to discuss its modern slavery risks which were agreed to be aligned with Rio Tinto’s risks.

Key Rio Tinto policies, standards and processes apply to ERA. This includes The Way We Work and the human rights policy, and ERA employees are required to complete Rio Tinto’s mandatory ethics and compliance training. Rio Tinto’s communities and social performance standard also applies to ERA, and business conformance audits are periodically performed. ERA follows Rio Tinto’s policies and procedures with regard to supplier due diligence, with ERA’s suppliers being screened by Rio Tinto’s TPDD team under the KYTP procedure. ERA also uses Rio Tinto’s standard supplier contract and purchase order terms, including the modern slavery provisions outlined earlier in this Statement.

Rio Tinto’s confidential complaint reporting service, myVoice, applies to ERA and is available to ERA stakeholders. In 2022 Rio Tinto’s online human rights training (including on modern slavery) for Rio Tinto procurement will be mandatory for the ERA procurement team. Additional information about ERA can be accessed in ERA’s 2021 Annual Report.
Consultation across our business

1. Alumina & Bauxite Company Ltd is a subsidiary of United Company Rusal IPJSC. We are actively reviewing any existing commercial ties to Russia across our global business and closely monitoring the situation, including the implications of trade sanctions, which we are committed to complying with. We are having ongoing and constructive discussions with Rusal and other stakeholders.

QAL

QAL is one of the largest alumina refineries in Australia. In 2021, QAL was jointly owned by Rio Tinto (80%) and Alumina & Bauxite Company Ltd (20%) \(^1\). In April 2022, Rio Tinto took on 100% of the capacity and governance of QAL until further notice, related to the Australian Government’s sanction measures. The refinery is located in Gladstone, Queensland and produces some 3.80 million tonnes of the world’s best smelter grade alumina per year. A portion of alumina produced by QAL is processed locally by Boyne Smelters Limited, which is jointly owned by Rio Tinto (59.4%) and a consortium of Japanese companies. The aluminium product is then shipped across the globe.

QAL’s operations include a wharf and storage facility on South Trees Island and the operation employs approximately 1,000 staff and engages approximately 875 contractors. During the reporting period, QAL’s total spend was A$1 billion with 1,471 suppliers located in 14 countries. The main categories of spend were procurement of raw materials and energy (caustic soda, coal, gas, water, power and lime), maintenance services, maintenance materials (valves and pipework), operating supplies (fuels and lubricants) and project goods and services for capital expenditure.

In 2021, QAL undertook a high-level review of its modern slavery risk areas with the support of Rio Tinto’s Human Rights specialists. The review found that QAL’s modern slavery risk areas were largely aligned with Rio Tinto’s identified high-risk goods and services. QAL has adopted select Rio Tinto policies and processes, including The Way We Work, and is working to implement the Rio Tinto communities and social performance standard, as well as incorporating a number of Rio Tinto standards and expectations into its own policies and processes. QAL’s ethics and integrity training module covers The Way We Work, including its human rights elements. Business conformance audits against Rio Tinto’s communities and social performance standard are periodically performed in relation to QAL. In relation to supplier due diligence, selected new suppliers are screened by Rio Tinto’s TPDD team under the KYTP procedure. Use of the procedure is based on a threshold value and a risk assessment.

QAL has its own Supplier Code of Conduct which sets out the company’s expectations that suppliers: ensure all workers are of local legal age and prevent the use of illegal child labour, affirm there is no forced or bond labour, respect workers’ rights to freedom of association and ensure fair remuneration and work conditions for all workers.

QAL has its own community grievance mechanism (ROCS) available 24/7 via phone and online. During the reporting period, no modern slavery or other labour issues were raised through this mechanism, including relating to suppliers. QAL also has a whistleblower service and an independent grievance service referred to as Speak Out which is available to employees and contractors. No modern slavery concerns were raised via Speak Out during the reporting period. QAL also does targeted marine related due diligence. This includes that the majority of vessels that berth at the QAL wharf are Rightship vetted. QAL recognises that not all modern slavery controls implemented by Rio Tinto in its business have been adopted into QAL’s business.

In 2021, QAL reviewed its modern slavery risks and controls and identified the following areas for action in 2022:

- Exploring ways to further extend the assessment of modern slavery risks for all vessels that use the QAL wharf;
- Development and publication of a human rights policy;
- Embedding modern slavery clauses into new contracts and where possible, into existing contracts when extended;
- Reviewing QAL’s supplier due diligence to consider broadening the application of the Rio Tinto KYTP procedure to a greater number of QAL’s new suppliers and a bi-annual review for existing suppliers;
- Mandatory online human rights including modern slavery training for employees in the QAL Procurement and Marine teams; and
- Building awareness of the Speak Out mechanism with our suppliers.

These controls have been designed in response to the perceived gaps identified in QAL’s 2021 workshop on modern slavery. QAL will continue to monitor its modern slavery risks and endeavour to embed and adopt practices to reduce risk. Additional information about QAL can be accessed on its website.

1. Alumina & Bauxite Company Ltd is a subsidiary of United Company Rusal IPJSC. We are actively reviewing any existing commercial ties to Russia across our global business and closely monitoring the situation, including the implications of trade sanctions, which we are committed to complying with. We are having ongoing and constructive discussions with Rusal and other stakeholders.
10. Looking ahead

Preventing and addressing modern slavery risks in our business and supply chains is an ongoing process that requires long-term planning and vigilance. It also depends on integrated, cross-functional collaboration and external partnerships to help achieve long-lasting change. To continue to evolve our approach, in 2022 and beyond we will focus on:

**Building our capability**
- Aligned with the update of our human rights policy, updating our Group human rights training strategy, guidance and online programme to deliver on our Group human rights training targets.
- Delivering and evolving tailored human rights training (including on modern slavery) for those functions with identified higher touchpoints with modern slavery risks.
- Designing a proactive supplier engagement training and capability programme to enhance knowledge of human rights (including modern slavery) and our human rights expectations.
- Hiring a Principal Advisor, Responsible Sourcing in our CSP Area of Expertise.

**Continuing to improve our risk assessments and response**
- Resourcing (people and systems) to effectively manage our evolving supplier and other third party engagement (by the TPDD and Human Rights teams).
- Improving the depth and breadth of our supplier risk assessments.
- Piloting the inclusion of the high-risk goods categories (as identified in Section 2) in our KYTP procedure Approach to Labour Rights Questionnaire for new suppliers.
- Driving consistent risk-based processes across the Group.

**Improving our governance**
- Implementing our updated human rights policy and control framework and CSP standard.
- Finalising and implementing our Responsible Sourcing Action Plan.
- Updating our SCOC including in relation to human rights (including modern slavery).
- Strengthening human rights clauses in contracts.
- Expanding our reporting categorisations for labour-related complaints within the myVoice system to include a wider range of modern slavery risk indicators.
- Strengthening implementation of asset-level grievance mechanisms, including aligning with the UNGPs’ effectiveness criteria, clarifying site-level accountabilities and improving reporting.
- Providing guidance on how to proactively implement a modern slavery response plan.

**External engagement**
- Contributing to the review of the Australian MSA in 2022.
- Continuing discussion with civil society on modern slavery, including root causes and mitigations, through our civil society engagements.

These are important steps to support ongoing improvement in our approach to preventing and addressing any involvement we could have in modern slavery in our own business and across our supply chains. But we know there is more to do and we will continue to work and seek progress on this global issue through collaborative action across both our business and supply chains.
## Appendix 1

### Our 2021 reporting entities

This Statement is made on behalf of Rio Tinto Limited (ABN 96 004 458 404) (an Australian MSA reporting entity) and Rio Tinto plc (a UK MSA reporting entity) (the Australian and UK listed parent companies (respectively) of the Rio Tinto dual listed companies structure and the Group’s major holding companies) as well as the following entities:

<table>
<thead>
<tr>
<th>Entity</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Australian MSA reporting entities</strong></td>
<td></td>
</tr>
<tr>
<td>Alcan Primary Metal Australia Pty Ltd (ABN 25 055 787 909)</td>
<td>Tomago Aluminium Joint Venture participant (36.05% interest).</td>
</tr>
<tr>
<td>Alcan South Pacific Pty Ltd (ABN 47 009 726 078)</td>
<td>Holds a bauxite mining lease in Cape York (Weipa) and is party to the Alcan Reorganisation Act (Qld).</td>
</tr>
<tr>
<td>Argyle Diamonds Limited (ABN 36 009 102 621)</td>
<td>Owns the Argyle diamond mine which mines and processes diamonds which has ceased production. Managing decommissioning of the mine, rehabilitating the site and other closure activities.</td>
</tr>
<tr>
<td>Boyne Smelters Limited (ABN 90 010 061 935)</td>
<td>Incorporated joint venture vehicle for the BSL Joint Venture (59.343% owned by Rio Tinto) which operates the BSL aluminium smelter on behalf of and as agent for the participants in the joint venture.</td>
</tr>
<tr>
<td>Cathijoh Holdings Pty Limited (ABN 64 094 265 871)</td>
<td>Tomago Aluminium Joint Venture participant (15.5% interest).</td>
</tr>
<tr>
<td>Channar Mining Pty Ltd (ABN 48 009 127 039)</td>
<td>Channar Mining JV participant and raises finance for the joint venture.</td>
</tr>
<tr>
<td>Dampier Salt Limited (ABN 30 008 706 590)</td>
<td>Joint venture company which owns and operates the Dampier Salt business (68.36% owned by Rio Tinto).</td>
</tr>
<tr>
<td>Energy Resources of Australia Ltd (ABN 71 008 550 865)</td>
<td>ASX listed company which operates the Ranger uranium mine which has ceased production (86.3% owned by Rio Tinto).</td>
</tr>
<tr>
<td>GPS Energy Pty Limited (ABN 36 063 207 456)</td>
<td>Gladstone Power Station Joint Venture participant (22.125% interest).</td>
</tr>
<tr>
<td>GPS Nominee Pty Limited (ABN 49 063 213 552)</td>
<td>Holding company of a Gladstone Power Station Joint Venture participant.</td>
</tr>
<tr>
<td>GPS Power Pty Limited (ABN 34 009 103 422)</td>
<td>Gladstone Power Station Joint Venture participant (20% interest).</td>
</tr>
<tr>
<td>Hamersley Holdings Limited (ABN 50 008 446 222)</td>
<td>Holding company for Australian assets involved in the mining, transport and export of iron ore, exploration for mineral deposits, servicing of sales contracts, participation in shipping ventures, raising of finance for such purposes and investment of surplus funds.</td>
</tr>
<tr>
<td>Hamersley Iron Pty Limited (ABN 49 004 558 276)</td>
<td>Undertakes mining and transportation of iron ore, invests surplus funds and provides services to the Channar Mining Joint Venture and Boa-Hamersley Iron Joint Venture.</td>
</tr>
<tr>
<td>Hamersley WA Pty Ltd (ABN 53 115 004 138)</td>
<td>Participant in the unincorporated joint venture for the development of the Hope Downs deposits in the Hope Downs Joint Venture (50% interest).</td>
</tr>
<tr>
<td>Hope Downs Marketing Company Pty Ltd (ABN 58 115 712 117)</td>
<td>Undertakes marketing for the Hope Downs Joint Venture (50% owned by Rio Tinto).</td>
</tr>
<tr>
<td>North Limited (ABN 22 005 233 689)</td>
<td>Holds the North Group of companies which includes owners of iron ore, uranium and copper mines, and Rio Tinto’s shares in Energy Resources Australia (52% interest).</td>
</tr>
<tr>
<td>North Mining Limited (ABN 78 000 081 434)</td>
<td>Owns interest in Robe River Iron Associates Joint Venture (35% interest) which undertakes iron ore mining.</td>
</tr>
<tr>
<td>Pacific Aluminium Pty Limited (ABN 57 008 447 943)</td>
<td>Holding company of 100% interest in Rio Tinto Aluminium (Holdings) Limited and 68% interest in Dampier Salt Limited.</td>
</tr>
<tr>
<td>Entity</td>
<td>Description</td>
</tr>
<tr>
<td>------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Pechiney Consolidated Australia Pty Limited (ABN 39 076 569 769)</td>
<td>Holding company of a Tomago Aluminium Joint Venture participant.</td>
</tr>
<tr>
<td>Peko-Wallsend Pty Ltd (ABN 78 000 245 054)</td>
<td>Holding company including for ERA shares (34.3% interest).</td>
</tr>
<tr>
<td>Pilbara Iron Company (Services) Pty Ltd (ABN 35 107 210 248)</td>
<td>Supports Pilbara Iron Pty Ltd in the provision of administration services.</td>
</tr>
<tr>
<td>Pilbara Iron Pty Ltd (ABN 75 107 216 535)</td>
<td>Operates the various infrastructure and non-infrastructure assets formerly owned and/or operated by each of Hamersley Iron Pty Ltd and the Robe River Associates Joint Venture.</td>
</tr>
<tr>
<td>Queensland Alumina Limited (ABN 98 009 725 044)</td>
<td>Incorporated joint venture vehicle for the QAL Joint Venture (80% owned by Rio Tinto) which operates the QAL alumina refinery on behalf of and as agent for the participants in the joint venture.</td>
</tr>
<tr>
<td>Rio Tinto Aluminium (Bell Bay) Limited (ABN 91 009 483 201)</td>
<td>Operates the Bell Bay aluminium smelter.</td>
</tr>
<tr>
<td>Rio Tinto Aluminium (Holdings) Limited (ABN 37 004 502 694)</td>
<td>Holding company of companies involved in bauxite mining, alumina production and primary aluminium smelting.</td>
</tr>
<tr>
<td>Rio Tinto Aluminium Bell Bay Sales Pty Limited (ABN 11 160 684 391)</td>
<td>Sales entity for the Bell Bay aluminium smelter.</td>
</tr>
<tr>
<td>Rio Tinto Aluminium Limited (ABN 51 009 679 127)</td>
<td>Boyne Smelters Limited Joint Venture participant (51.85% interest), Queensland Alumina Limited Joint Venture participant (38.61% interest) and Australian holding company for aluminium assets including RTA Weipa Pty Ltd and RTA Yarwun Pty Ltd which operate the Weipa bauxite mine and the Yarwun alumina refinery respectively. Foundation Member of Developing East Arnhem Limited (DEAL).</td>
</tr>
<tr>
<td>Rio Tinto Investments One Pty Limited (ABN 31 093 137 323)</td>
<td>Holding company established to acquire the North Group.</td>
</tr>
<tr>
<td>Rio Tinto Investments Two Pty Limited (ABN 54 093 137 485)</td>
<td>Holding company established to acquire the North Group.</td>
</tr>
<tr>
<td>Rio Tinto Services Limited (ABN 62 004 219 738)</td>
<td>Provides internal corporate administration and general services for the Rio Tinto Limited group of companies, predominantly in Australia.</td>
</tr>
<tr>
<td>Rio Tinto Shared Services Pty Limited (ABN 69 113 306 077)</td>
<td>Provider of shared transactional services in Australia including financial services, human resources and facilities management.</td>
</tr>
<tr>
<td>Robe River Limited (ABN 90 008 478 943)</td>
<td>Holds 60% interest in Robe River Mining Co Pty Ltd which holds interest in Robe River Iron Associates JV (18% interest).</td>
</tr>
<tr>
<td>Robe River Mining Co. Pty Ltd (ABN 90 008 478 943)</td>
<td>Holds 30% interest in and manages Robe River Iron Associates Joint Venture.</td>
</tr>
<tr>
<td>RTA AAL Australia Limited (ABN 13 008 589 080)</td>
<td>Holding company for aluminium assets including Swiss Aluminium Australia Limited which operates the Gove bauxite mine and facilities.</td>
</tr>
<tr>
<td>RTA Boyne Limited (ABN 22 008 650 600)</td>
<td>Boyne Smelters Limited Joint Venture participant (7.49% interest).</td>
</tr>
<tr>
<td>RTA Holdco Australia 1 Pty Ltd (ABN 17 128 762 318)</td>
<td>Holding company including of RTA AAL Australia Limited.</td>
</tr>
<tr>
<td>RTA Holdco Australia 5 Pty Ltd (ABN 38 128 785 599)</td>
<td>Queensland Alumina Limited Joint Venture participant (41.39% interest).</td>
</tr>
<tr>
<td>RTA Pacific Pty Limited (ABN 35 004 546 436)</td>
<td>Holding company including of Pacific Aluminium (New Zealand) Limited.</td>
</tr>
<tr>
<td>RTA Weipa Pty Ltd (ABN 54 137 266 285)</td>
<td>Owns and operates the Weipa bauxite mine and facilities and operates the Weipa Town Authority and Cape Kids Child Care, and holds mining leases in Weipa.</td>
</tr>
<tr>
<td>RTA Yarwun Pty Ltd (ABN 73 137 266 301)</td>
<td>Owns and operates the Yarwun alumina refinery.</td>
</tr>
<tr>
<td>Entity</td>
<td>Description</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>RTPDS Aus Pty Ltd (ABN 21 099 346 899)</td>
<td>Manages investments in related entities including receiving &quot;dual listed company dividends&quot; from Rio Tinto Limited.</td>
</tr>
<tr>
<td>Swiss Aluminium Australia Limited (ABN 92 008 589 099)</td>
<td>Owns and operates the Gove bauxite mine and facilities and member of Nhulunbuy Corporation Limited.</td>
</tr>
<tr>
<td>Technological Resources Pty Limited (ABN 12 002 183 557)</td>
<td>Holds trademarks and patents in relation to mine technology innovation.</td>
</tr>
<tr>
<td>UK MSA reporting entities</td>
<td></td>
</tr>
<tr>
<td>Borax Europe Limited</td>
<td>Markets and distributes borates, mainly throughout Europe.</td>
</tr>
<tr>
<td>Rio Tinto Escondida Ltd</td>
<td>Holds 30% interest in Minera Escondida Limitada, the owner of a large open pit copper mine in Chile.</td>
</tr>
<tr>
<td>Rio Tinto European Holdings Ltd</td>
<td>Investment holding company for the Group.</td>
</tr>
<tr>
<td>Rio Tinto London Limited</td>
<td>Performs services on behalf of other Group companies and sponsoring employer for a number of UK pension schemes.</td>
</tr>
<tr>
<td>Rio Tinto OT Management Limited</td>
<td>Re-charges the Group services and international assignee (expatriates) labour costs, at cost, in connection with the Group’s role to provide operational services to the OT project. Charges a management fee for provision of management services in relation to the project.</td>
</tr>
</tbody>
</table>
Appendix 2

Reporting criteria and UNGPs

How we are addressing the UK and Australian MSA reporting criteria

<table>
<thead>
<tr>
<th>UK Modern Slavery Act reporting criterion</th>
<th>Australian Modern Slavery Act reporting criterion</th>
<th>Reference in this Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organisation's structure, its business and its supply chains.</td>
<td>Identify the reporting entity. Describe the reporting entity’s structure, operations and supply chains.</td>
<td>About this Statement Appendix 1 Section 1</td>
</tr>
<tr>
<td>Parts of the organisation’s business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.</td>
<td>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.</td>
<td>Section 2 Section 4</td>
</tr>
<tr>
<td>Organisation’s policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff.</td>
<td>Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.</td>
<td>Sections 3-7 Section 9</td>
</tr>
<tr>
<td>Organisation’s effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.</td>
<td>Describe how the reporting entity assesses the effectiveness of such actions.</td>
<td>Section 8</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>How we are addressing the UNGPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Element of the UNGPs</strong></td>
</tr>
<tr>
<td>Policy commitment</td>
</tr>
<tr>
<td>Human rights due diligence</td>
</tr>
<tr>
<td>– Identifying and assessing impacts</td>
</tr>
<tr>
<td>– Acting on findings</td>
</tr>
<tr>
<td>– Tracking responses</td>
</tr>
<tr>
<td>– Communicating how impacts are addressed</td>
</tr>
<tr>
<td>Processes to enable remediation, including alignment with the effectiveness criteria for non-judicial grievance mechanisms</td>
</tr>
</tbody>
</table>