



IVANHOE MINES

Report on Fighting Against Forced Labour and Child Labour in Supply Chains

For the Financial Year
Ended December 31, 2023

Table of Contents

About this report	1
About our business	2
About our policies and due diligence processes	5
About potential risks	9
About our remediation measures for lost income of vulnerable families ..	9
About our training	10
Assessing our effectiveness	10
Looking forward in 2024	11
Approval and attestation	12

About this report

Ivanhoe Mines Ltd. (“Ivanhoe Mines”, “Ivanhoe”, or the “Company”) has prepared this Fighting Against Forced Labour and Child Labour in Supply Chains Report (the “Report”) in accordance with Section 11 of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for the financial year ended December 31, 2023. This is a single report made under Section 11(2)(a) of the Act on behalf of Ivanhoe Mines, which includes information related to its associated material projects over which it exercises Control as defined in Section 10(1) of the Act.

Ivanhoe’s material projects over which it exercises Control, contained in this report are as follows:

Material projects	Existing under the laws of	Ownership	Activity
Ivanplats Proprietary Limited (also known as the Platreef Project)	The Republic of South Africa	64%	A multi-generational Platreef palladium-rhodium-nickel-platinum-copper-gold Project which is still in construction. Commencement of production is planned for 2025.
Kipushi Corporation (also known as the Kipushi Project)	The Democratic Republic of the Congo	68%	A historic zinc-copper germanium- silver-lead mine which is in the process of being refurbished with anticipated production commencing in 2024.

In addition, for this report, the Company has elected to include information on its third material project, which it operates as a joint venture.

Material projects	Existing under the laws of	Ownership	Activity
Kamoa Copper SA (also known as the Kamoa-Kakula Copper Complex, or Kamoa-Kakula)	The Democratic Republic of the Congo	Joint venture in which Ivanhoe holds an effective 39.6%	Began producing copper concentrate in May 2021 and has since undergone multiple phases of expansion. The ongoing Phase 3 expansion will further increase copper production at Kamoa-Kakula, which is already one of the largest copper complexes in the world.

This Report describes the steps taken by Ivanhoe Mines to assess and address Ivanhoe's risks with respect to forced labour and child labour (Modern Slavery Risks). In this Report, unless otherwise stated, references to "Ivanhoe Mines", "Ivanhoe", the "Company", "we", "us", "our" and similar expressions include the Sites. Monetary amounts in this Report are expressed in US dollars, unless otherwise stated.

About our business

Ivanhoe Mines is a Canadian mining company with its head office located in Vancouver, British Columbia (TSX: IVN) and principal properties located in Southern Africa. The Company currently has three material assets, which have been included in the scope of this report ("Sites"), namely:

- The Kamoakakula Copper Complex (or "Kamoakakula"), a large, high-grade, stratiform copper deposit, was discovered by the Company beyond the previously known western limit of the Central African Copperbelt, in Lualaba Province, DRC. Kamoakakula began commercial production of copper concentrate in July 2021. Kamoakakula is currently undergoing its third phase of expansion, and is among the world's five largest copper mines, as well as being the lowest carbon-intensive major copper mine.
- The Platreef Project, a thick and high-grade palladium, nickel, platinum, rhodium, copper and gold deposit on the northern limb of the Bushveld Complex, in Limpopo, South Africa. The Platreef Project is a tier-one, multi-generational asset, which is currently undergoing construction, with the Phase 1 concentrator expected to commence cold commissioning in 2024, with first production in 2025.
- The Kipushi Project, a past-producing, ultra-high-grade, underground, zinc-copper-germanium-silver-lead mine in the Central African Copperbelt, in Haut-Katanga Province, DRC. The Kipushi Project is under construction and ahead of schedule for first production in 2024.

The Company conducts its operations through Control of its material projects, as well as through a joint venture at Kamoakakula. The following diagram depicts the corporate structure of the Company as of December 31, 2023:

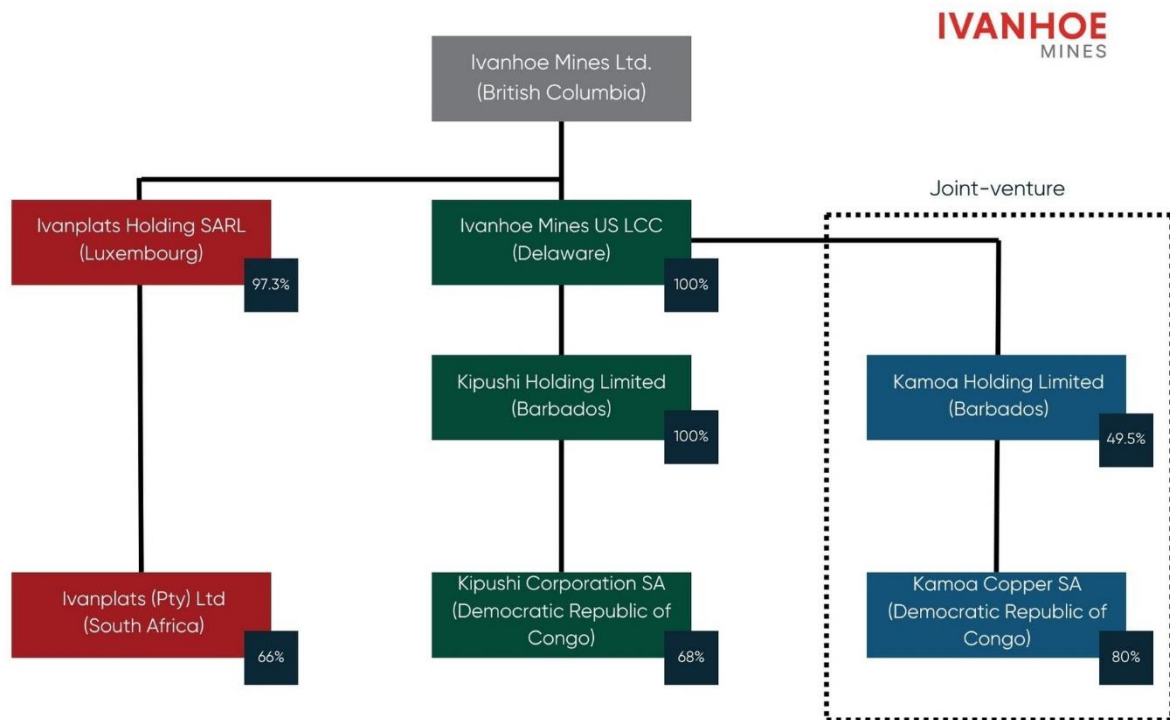


Figure 1 Company structure.

As of December 31, 2023, Ivanhoe Mines had approximately 1,090 employees, almost all of whom were employed on a permanent basis. Five of its employees were based in the head office in Vancouver, Canada. The remaining employees work at the Company's corporate offices in Johannesburg, London and Beijing, as well as at the Company's projects in the Democratic Republic of the Congo and South Africa. In addition, as at December 31, 2023, the Company's Kamoa-Kakula joint venture had approximately 4,809 employees.

Approximately, 26% of the Company's workforce is unionized and an additional 29%, while not unionized, are covered by a collective bargaining agreement (including through its subsidiaries and excluding employees of the Kamoa-Kakula joint venture). Approximately, 95% of Kamoa-Kakula's workforce is unionized.

Governance

Ivanhoe Mines' stewardship and governance is the responsibility of our Board of Directors ("the Board"), who fulfils its mandate either directly or through delegation to its five committees at regularly scheduled meetings, or as required. Each committee of the Board oversees risks within their functional area. The Sustainability Committee is primarily responsible for establishing and overseeing our sustainability and environmental, social and governance ("ESG") risks and opportunities, practices, policies, performance and disclosures across a number of areas such as human rights (including Modern Slavery Risks), health, safety and well-being, responsible sourcing, climate governance, and local economic development.

The Company's President chairs the executive committee and bears the ultimate management responsibility for ESG risk management, together with the Chief Operating Officer, Chief Financial Officer, and Executive Vice President, Sustainability and Special Projects. Sustainability is regarded as a cross-functional discipline and the Executive Vice President, Sustainability and Special Projects is also responsible for convening and coordinating employees in other corporate functions or business units (legal, supply chain, human resources ("HR"), communications etc.) to support programs or activities that reinforce Ivanhoe's focus on ESG matters, inclusive of risk management. We have a dedicated corporate sustainability team, headed by the Vice President, Sustainability, which interfaces with the project sites and oversees operational implementation of the Company's sustainability imperatives and requirements.

Overview of Our Supply Chain

The majority of the Company's procurement activities occur through a procurement function/department at each Site. Each Site is required to abide by the applicable in-country regulatory framework as well as the Company's Responsible Sourcing Policy which is aligned to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the Act. We have also developed a Responsible Sourcing Standard for implementation in 2024.

Our Sites each procure a wide range of goods and services to support their key project phase activities including construction, mining, processing and transportation. A small portion of our procurement activities are also attended to by various departments at the Company's various corporate offices. These activities mainly include information technology and administrative-linked procurement, as well as the procurement of services from an array of specialist consultants.

The Procurement Department at each Site is responsible for procurement governance, with oversight from the Sites' Managing Director or General Manager, as well as the Commercial Finance Managers. In general, procurement is done by way of the Company's standard form contractual agreements, inclusive of the organization's general terms and conditions.

After the Act was passed in May 2023, the Company enlisted an external consultant to assist in reviewing and revising the Group Responsible Sourcing Policy to comply with the Act. As part of this undertaking, a Responsible Sourcing Standard and Code of Conduct was also developed and presented to relevant stakeholders within the Sites' Procurement and HR Departments. Together with the external consultant, the Company is developing a Responsible Sourcing Toolkit which will be embedded into the existing supplier portals (for more stringent supplier registration requirements) throughout 2024 and 2025.

Due to the jurisdictions within which we operate, the Company recognises the importance of supporting local enterprises and suppliers by creating opportunities

across the value chain. The majority of the Company's supply chain activities take place in the DRC and South Africa.

When measured by value, the Company's total procurement expenditure was \$3.0 billion (on a 100% project basis) for the financial year ended December 31, 2023, with 66% attributed to the DRC, 21% to South Africa and the remainder to other African and global activities. Much of this expenditure was generated through the Company's support of local businesses and service providers.

About our policies and due diligence processes

Through the Company's policies, standards and procedures, we commit to upholding our responsibility to respect human rights, as guided by the United Nations Guiding Principles on Business and Human Rights ("UNGPs"), implementing measures to contribute towards responsible environmental stewardship at all of our projects, and implementing appropriate governance measures to operate responsibly and avoid involvement with bribery and corruption.

In our contracts, we require that our business partners and suppliers within our supply chain agree to comply with the Ivanhoe Mines Code of Business Conduct and Ethics, as well as with specific terms and conditions inclusive of relevant standards and policies.

The Company follows good international environmental, social, and governance practices in our sourcing and contracting of products and services, and when managing our relationship with business partners in our supply chain. As part of this, Ivanhoe acknowledges its role in the management of risks related to human rights and environmental violations, and governance-related infringements in our supply chain.

Together, the following policies form a framework of standards required of our Board of Directors, officers, employees, contractors and suppliers to ensure human rights are respected, and to identify and appropriately address Modern Slavery Risks in our operations and supply chains:

- **Code of Business Conduct and Ethics and Companion Booklet ("the Code")** – describes our commitment to a culture of honesty, integrity, accountability and respect for our communities and provides guidelines, principles and policies for everyone to comply with. The Code applies to directors, officers, employees, consultants, contractors and advisors of the Company and its subsidiaries and covers issues ranging from compliance with laws, rules and regulations, conflicts of interest, corporate opportunities, confidentiality and Company assets, to insider trading, improper payments, fair dealing, health and safety, compliance with environmental laws, corporate disclosure and Company records, among other things. As a company subject to Canadian securities laws and the

policies of the Toronto Stock Exchange, Ivanhoe is also required to establish whistleblower procedures relating to auditing and accounting matters which are also addressed in the Code.

- **Corporate Citizenship, Statement of Values and Responsibilities Policy** – sets out the Company’s commitment to conducting its operations and activities in accordance with its core principles. This policy reflects the obligations and partnerships that naturally accompany the various permissions that we receive to operate in countries and communities with divergent degrees of economic development. It establishes the Company’s commitments with respect to responsible exploration and mining by being a good global corporate citizen through its support for human rights, social justice and sound environmental management. The policy reiterates the Company’s commitment to fostering honesty, integrity and accountability throughout our business activities.
- **Human Rights Policy** – promotes respect for human rights and the conduct expected from all personnel and partners in order to realize this commitment. This policy is designed to ensure proper understanding, and effective use and integration of the Company’s human rights related management systems within the context of corporate- and site-level policies, international standards and Ivanhoe's culture of responsible and accountable corporate citizenship. Through our commitment to the UNGPs, the Company aims to ensure that these principles are integrated throughout the policies and processes which are designed to identify, assess and mitigate human rights risks across our Sites and value chain. Through ongoing monitoring, reporting, and transparent dialogue with stakeholders, the Company commits to ensuring a responsible and ethical business environment and seek partnerships with entities that share our commitment.
- **Responsible Sourcing Policy** – promotes transparent, ethical and competitive purchasing, taking into account environmental and social considerations and objectives. Within this policy, the Company pledges to make reasonable efforts to identify, assess, and manage material human rights impacts that they cause, contribute to, or are directly linked to through their supply chains. With the oversight of senior management, this Policy is progressively integrated into existing business processes and procedures through collaboration and coordination across different functions in the Company’s corporate offices and Sites, with a view to ensuring its full realisation.
- **Grievance Policy** – promotes a healthy working environment where individuals are treated with respect and courtesy and feel comfortable to lodge grievances without the being victimised or subjected to discrimination

when they submit or deal with grievances. The Company commits to resolve problems or where a member of staff feels that they have been unfairly or unreasonably treated and to provide members of staff with a reasonable and prompt opportunity to obtain redress of any grievance.

- **Victimization Policy** – reinforces the Company’s commitment to deal decisively and strongly with all incidents of workplace bullying, abuse and victimisation.
- **Community Relations Policy** – promotes the application of current best practice principles and comply with all relevant legislation in its respective countries of operation regarding community relations activities and initiatives to facilitate transparency and community buy-in and inform decision making.

Third Party Risk Management

To manage our third-party risk management, Ivanhoe employs a third-party due diligence platform offered by Refinitiv. This platform is used to screen suppliers on a risk-based approach for allegations and convictions of a variety of offences such as sanctions violations, bribery and corruption, child labour, forced labour, human trafficking, other human rights violations, fraud, money laundering, adverse media and more. This is part a management process consisting of:

- Obtaining supplier references;
- Comparing proposals at operations;
- Submission of company legislative forms on an electronic supplier portal; and
- Utilising our detailed verification records from prior years.

Our due diligence approach is risk-based, with greater scrutiny for suppliers who appear to pose a potential risk.

Contracting Arrangements

Child and Forced Labour Policies have been developed and implemented at Kamoakakula and the Platreef Project. Development of the corporate level policy, as well as the policy for the Kipushi Project, is currently underway. This policy is also applicable to our suppliers and contractors, and our human resource procedures ensure the prevention of employment of minors.

We have reviewed our supplier registration processes to screen for potential human rights risks, and our contractual provisions require that our suppliers abide by the Code, as well as other policies and procedures, providing the Company with the right to terminate the agreement in the event of a breach.

In 2024, through our ongoing work in respect of responsible sourcing, we intend to further review our contractual agreements and standard terms and conditions to include forced labour and child labour practices warranties.

Grievance Mechanisms and Remediation Efforts

We believe that trusted, effective grievance mechanisms play a key role in identifying and remediating social risks including human rights, modern slavery and loss of social licence to operate risks. We are committed to timeously and amicably resolving grievances. The Company regards a grievance as a notification, concern or complaint raised by an individual or group affected by our projects' activities averring that they have suffered some form of offence, detriment, impairment or loss as a result of our business activities and/or employee or contractor behavior.

The Company have devoted and will continue to devote appropriate time and resources to sharing project information, obtaining stakeholder feedback, addressing concerns, negating misinformation and resolving issues, to the best of our ability. To govern this process, the Company have implemented non-judicial grievance procedures at all of the projects, in line with the recommendations of the UNGPs. These grievance procedures serve as the formal channels through which stakeholders can notify the projects that offense was taken and guides the remediation process through specific and structured steps.

The external grievance procedure at each of our material projects is well publicised to external stakeholders, providing a number of established channels for engagement and/or feedback, including in-person, at public or community liaison meetings, via community portals, via phone and SMS or email. The grievance process is managed by the community relations teams at the respective projects and recorded and tracked through a web-based stakeholder management system. We acknowledge that both concerns and complaints can result from either real or perceived impacts of our business, and we treat all grievances with respect and consideration. Our grievance mechanisms are widely communicated through local platforms and accepted techniques and envisage a timely resolution process. Although we strive to handle all grievances internally, our process allows for escalation, and we accept the right of the complainant to access judicial remedies. In 2024, we intend to bolster our external grievance mechanisms through the installation of grievance boxes which will be made available at key points within local communities, thereby making them more accessible and enabling anonymous grievances to be lodged.

Where appropriate, stakeholders can also make use of the Ivanhoe Mines' corporate whistleblower mechanism, which was established to alert the Company of potential fraudulent or criminal activities. The whistleblower reporting mechanism is accessible 24/7 through a link available on the Ivanhoe Mines' website (available in English and French) or by phone (available in 150 languages). This is overseen by the Audit Committee, to encourage the Company's colleagues and stakeholders to raise concerns or report actual or suspected violations of law or policies. Whistleblower reports are confidential and can be made anonymously.

For more information on this, please refer to our Management Proxy Circular (accessible through the following link: <https://www.ivanhoemines.com/investors/document-library/#proxy>).

Ivanhoe did not receive any modern slavery reports through its Whistleblower process in 2023, nor through its site-based external grievance mechanisms. Despite receiving no complaints related to modern slavery, we will continue to look for ways to strengthen the effectiveness of our mechanisms. In 2024, we plan to undertake an independent review of both the internal and external grievance mechanisms, as well as the site-level stakeholder engagement practices to assess the effectiveness thereof in line with the Company's policies, procedures and best practice guidelines.

As the Company has not identified any instances of the use of forced or child labour, we have not undertaken any related remediation efforts. In the event that we identify any instances of the use of forced or child labour in the future, we will take appropriate remediation measures suitable for the circumstances and in accordance with international and industry standards.

About potential risks

Ivanhoe is cognizant of and endorses the critical importance of remaining abreast of the risk landscape and the fast-evolving interplay between economic, environmental, geopolitical, societal and technological risk factors, both in terms of their likelihood of occurrence and potential impacts on our business. The Company also undertakes human rights risk and impact assessments, which consider the severity of adverse consequences from potential impacts to both people and the environment.

Child labour in mining is commonly found in artisanal and small-scale mining activities (ASMs). Only the Kipushi Project has ASMs in its surrounds. The Company actively engages with these ASMs and has launched several campaigns in the last few years to prevent the presence of children on these ASM sites.

In 2024, the Company intends to undertake an assessment of the status quo of the ASMs in the Kipushi area, including a consideration of their working conditions, and presence of children. Initiatory engagements with some of these ASMs have already commenced. A key outcome of this ASM assessment is the development of an ASM management plan to address the key risks identified, including the presence of child labour within these groups.

About our remediation measures for lost income of vulnerable families

The Company has not identified any instances of lost income for the most vulnerable families arising from our efforts to address Modern Slavery Risks. As we continue to assess and address such risks and if we identify any lost income

for vulnerable families resulting from the actions we take in the future, we will take appropriate remediation measures suitable for the circumstances and in accordance with international and industry standards.

About our training

The Company acknowledges that ongoing due diligence and capacity building needs to be undertaken to ensure that all of our projects are aware of their role in supplier management, as well as the framework which is in place to support the Company's objective to source responsibly. In 2023, Ivanhoe Mines, together with an external specialist human rights consultant, provided mandatory human rights training for selected managerial employees, as well as implemented a human rights training video and quiz. This training included aspects related to modern slavery.

The Company also engaged with Site-level procurement functions on the revised Responsible Sourcing Policy, Responsible Sourcing Standard as well as the updated Supplier Code of Conduct. The engagement was focused on raising awareness on human rights risks within the supply chain and determining where existing supply chain practices need to be reinforced to minimise these risks.

In 2023, the Company also continued to work with its appointed specialist human rights consultant towards further developing and implementing human rights management systems, both at the corporate and site levels.

In 2024 we plan on introducing a Responsible Sourcing toolkit across our Sites. This toolkit aims to develop and strengthen our projects' supply chain risk management systems. It offers a systematic approach to integrating key sustainability considerations into existing tender and procurement processes through a clear and structured six-step guidance framework that can be seamlessly incorporated into procurement stages.

In addition, we intend to create a Supplier Code of Conduct Human Rights focused video to make our policy statements more accessible to business partners and their employees.

Assessing our effectiveness

A part of the Company's key performance objectives, the Human Rights and Responsible Sourcing programs will continue to be embedded in 2024. Both of these programs include compliance to the Act and the Company has planned for human rights due diligence to be undertaken at two of its Sites. This process will provide an assessment of Ivanhoe's effectiveness in implementing processes to prevent and mitigate human rights impacts both within the organisation, as well as in its supply chains. The outcome of this process will be a human rights action

plan, the implementation of which will be monitored and evaluated both internally, as well as by an independent consultant to assess our progress and effectiveness.

Looking forward in 2024

Ivanhoe Mines is committed to continuous improvement in all aspects of our business operations. We acknowledge that elements of human rights and Modern Slavery risks have the potential to appear in all areas of our business, and not just in our supply chain. It is therefore the Company's responsibility to take meaningful steps to engage at all levels within our business to educate our employees about these risks as well as Ivanhoe's strict stance against Modern Slavery risks, in line with our Corporate Policies described earlier.

In addition, we are planning the following actions for 2024:

- Completion of an independent human rights impact assessment at the Platreef Project and Kipushi Project, where this has not been previously undertaken. This will include reviewing Modern Slavery Risks.
- Development of ongoing workforce training and awareness building.
- Implementation of the Responsible Sourcing Toolkit into our supplier portals to assist in vetting of suppliers in line with our Human Rights and Responsible Sourcing Policies. This will include a classification of high and medium risk suppliers who will be screened for specific requirements associated with the use of child and forced labour.
- Undertaking an ASM assessment at the Kipushi Project to investigate the use of child labour within these groups and how the Company can facilitate in reducing this if it is found to be present.
- Further education for our employees related to available reporting mechanisms.
- Review of our internal and external grievance mechanisms to identify potential areas of improvement.

Approval and attestation

This Report was approved by the Board pursuant to Section 11(4)(a) of the Act on April 26, 2024.

In my capacity as Director and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have authority to bind Ivanhoe Mines Ltd.



Dr. Phumzile Mlambo-Ngcuka
Director
IVANHOE MINES LTD.



1-604-688-6630



www.ivanhoemines.com



info@ivanhoemines.com