

Modern Slavery Statement

Financial year ended March 31, 2023

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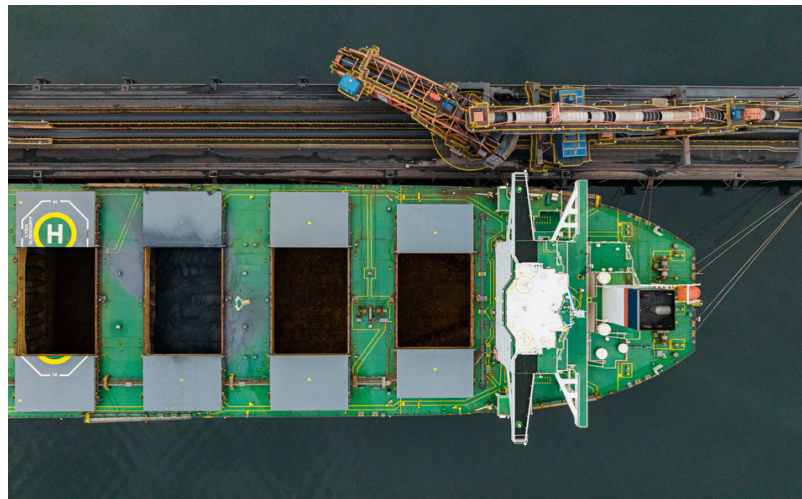
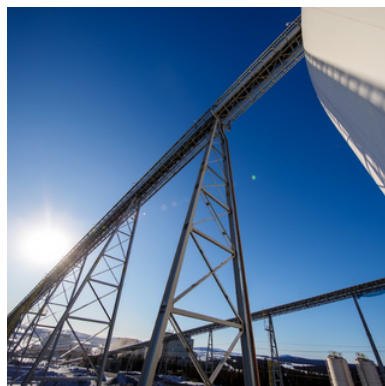
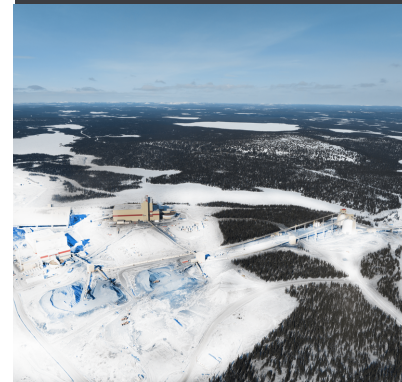
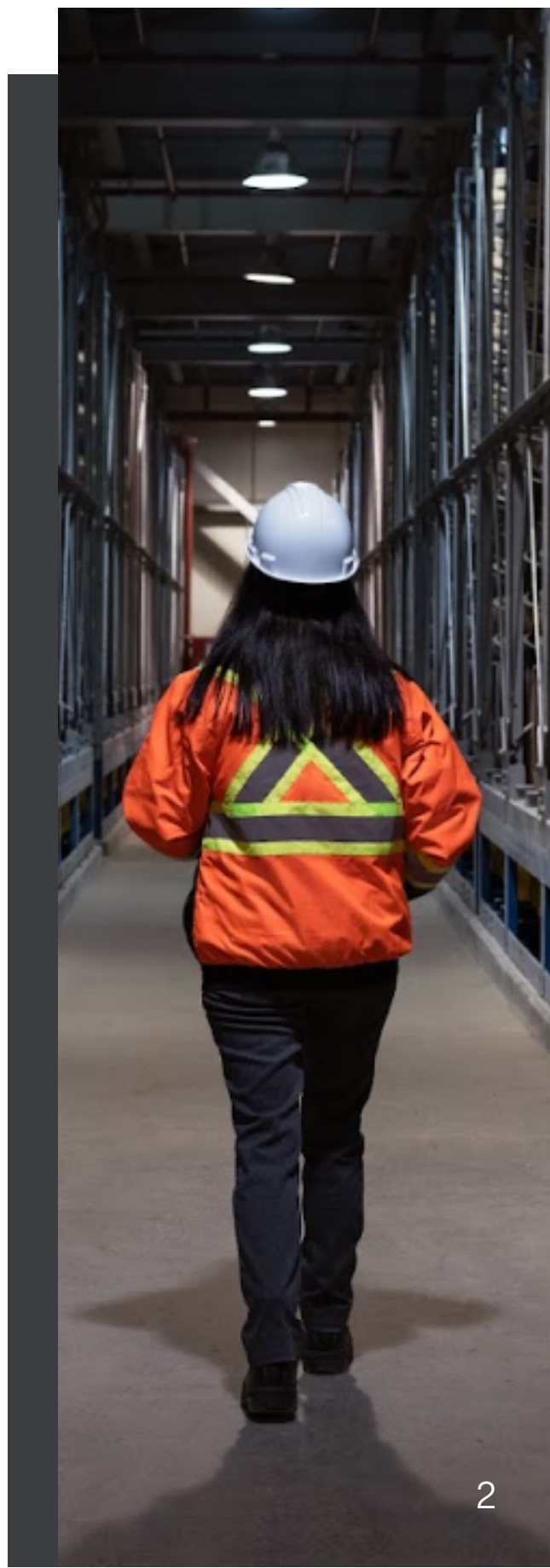


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ABOUT THIS REPORT

This statement has been prepared by Champion Iron Limited (the “Company” or “Champion”), to meet the requirements of the *Australian Modern Slavery Act 2018* (the “Act”) for the financial year ended March 31, 2023 (“FY23”). This is a Modern Slavery Statement (the “Modern Slavery Statement” or the “Statement”) covering Champion Iron Limited, and its subsidiaries including Quebec Iron Ore Inc. (“Quebec Iron Ore” or “QIO”).

References to “modern slavery” in this document refer to the types of exploitation defined by the Act, namely anything that encompasses the trafficking of persons, slavery and the slave-like practices of servitude, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. All references to our, we, us, the Company, and Champion refer to Champion Iron Limited (ABN 34 119 770 142) and Quebec Iron Ore (the “Reporting Entities”), as well as the group’s non-reporting entity subsidiaries. All references to “year” refer to the financial year ended March 31, 2023 unless otherwise stated.

The Company’s Modern Slavery Statement forms part of Champion’s annual reporting suite. All reports, including our previous Modern Slavery Statements and additional information on our approach to human rights, are available on our website at www.championiron.com. This Modern Slavery Statement captures the activities of Champion, Quebec Iron Ore, its subsidiaries and all entities owned and controlled by the Company.

Champion values its stakeholder relationships and welcomes feedback as part of its commitment to maintaining open and transparent communications. Please direct any questions you may have on this statement or requests for additional information to info@championiron.com.

This statement was approved by the Board of Directors of Champion on September 21 2023.

(s) *David Cataford*

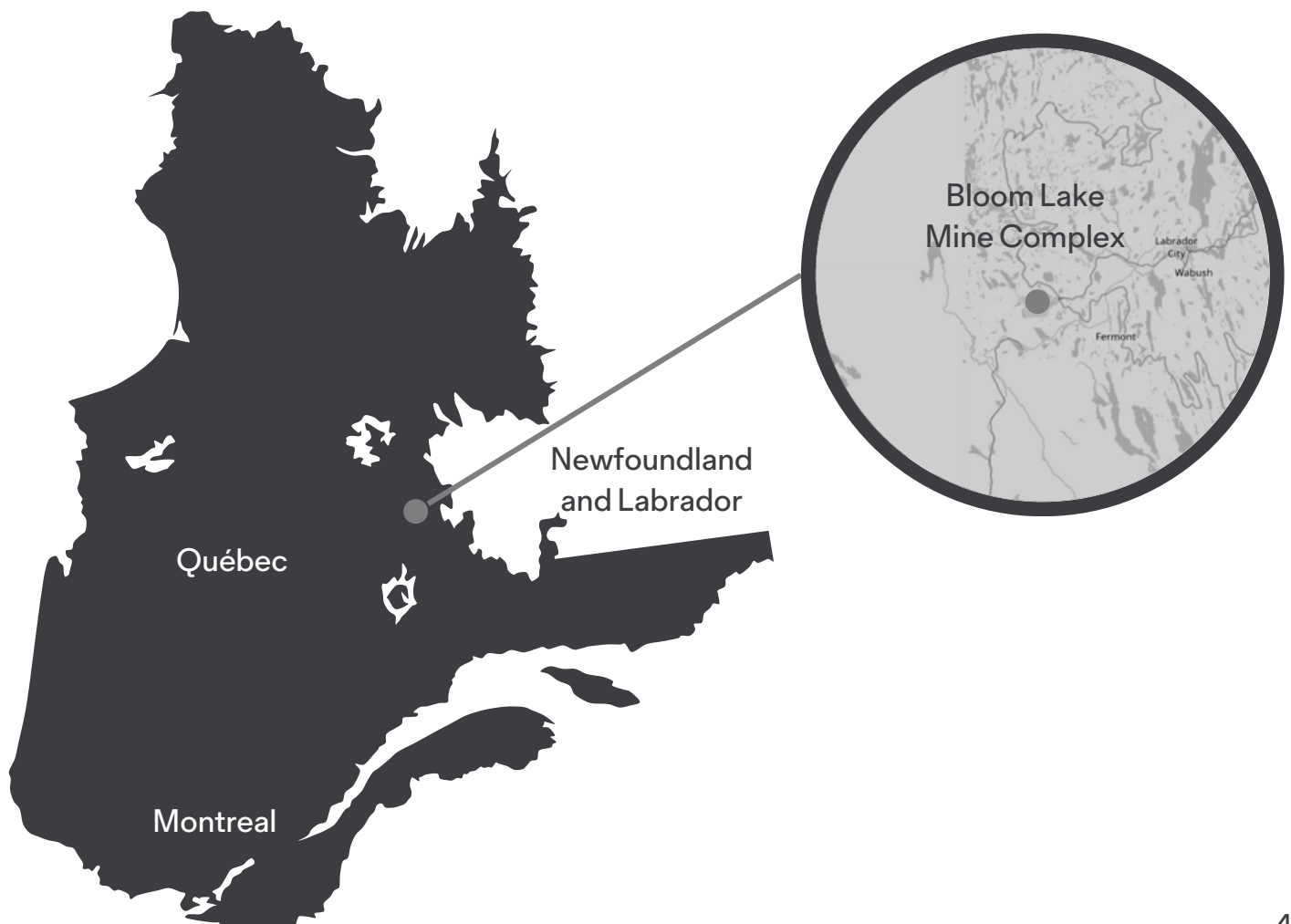
DAVID CATAFORD
CHIEF EXECUTIVE OFFICER

OUR STRUCTURE, BUSINESS AND SUPPLY CHAIN

OUR ORGANIZATIONAL STRUCTURE AND OPERATIONS

Champion is an iron ore exploration, development and production company with major projects in the southern Labrador Trough, Canada's largest iron ore producing region. The Company was incorporated under the laws of Australia in 2006 and is listed on the Toronto Stock Exchange (TSX: CIA) and the Australian Securities Exchange (ASX: CIA), and trades on the OTCQX Best Market marketplace of the OTC Markets Group (OTCQX: CIAFF).

Champion is domiciled in Australia at 91 Evans Street, Rozelle NSW, and its principal administrative office is located at 1155 Rene-Levesque Boulevard West, Suite 3300, Montréal, Québec, Canada. Through its 100%-owned subsidiary, Quebec Iron Ore, Champion owns and operates the Bloom Lake Mining Complex ("Bloom Lake" or "Bloom Lake Mine"), located on the south end of the Labrador Trough, approximately 13 km north of Fermont, Québec, adjacent to established iron ore producers.



Champion's Bloom Lake Phase I plant was commissioned in 2018 with a nameplate capacity of 7.4 million tonnes of high-quality iron ore concentrate per annum. Bloom Lake's Phase II expansion project was completed in May 2022 and reached commercial production in December 2023 with a nameplate capacity of 15.2 million tonnes per annum.

Our target customers are mainly steel producers. Since 2018, Champion has sold its product to over 35 different customers globally. Our operations are illustrated through a visual representation of our value chain below.

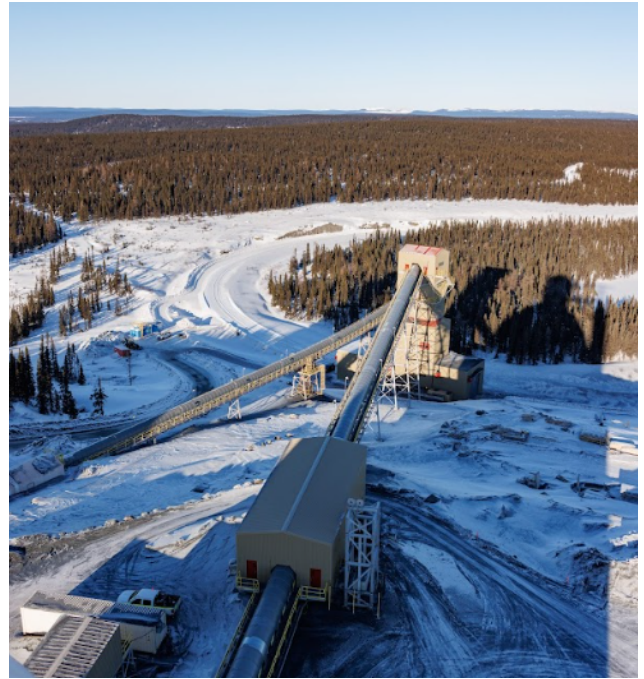


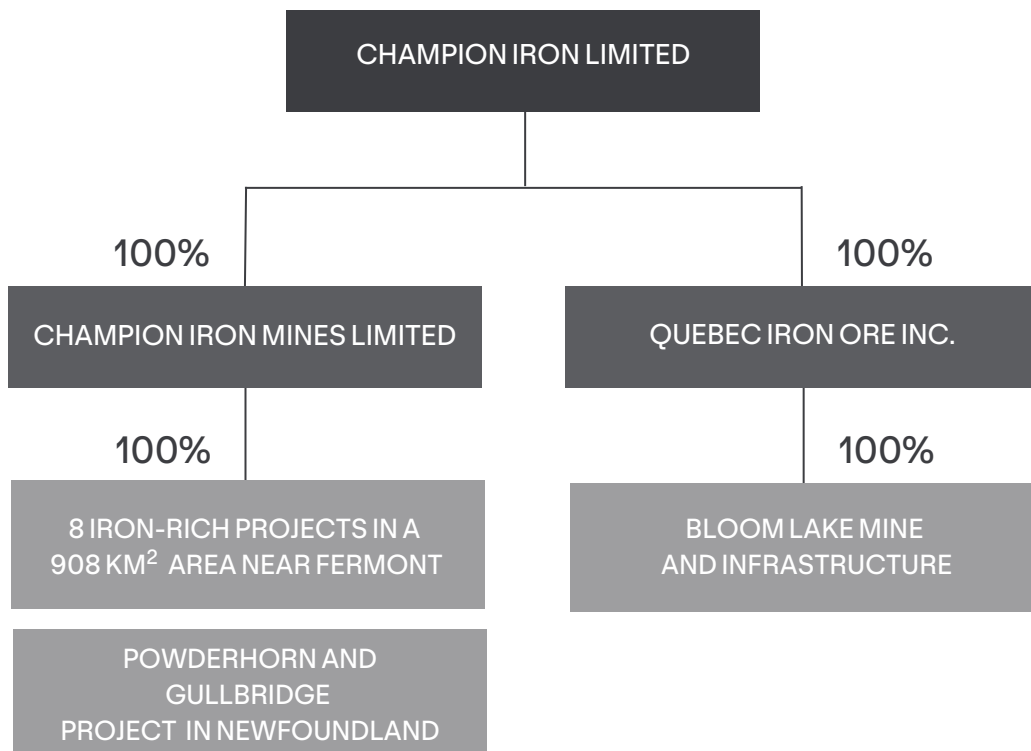
FIGURE 1. CHAMPION VALUE CHAIN



Through its wholly-owned subsidiary Champion Iron Mines Limited, the Company also owns a portfolio of exploration and development projects in the Labrador Trough. Following its acquisition of the Kamistatusset iron ore project (the “Kami Project”) in 2022, Champion commissioned a feasibility study to evaluate the project’s capability to produce a direct reduction (“DR”) grade pellet feed product. In May 2022, Champion also entered into a definitive agreement to acquire the Pointe Noire Iron Ore pelletizing facility in Sept-Iles, Québec, and a feasibility study has been undertaken to evaluate recommissioning the facility to produce DR grade pellets. Both studies are expected to be completed in the second half of 2023.

In January 2023, Champion announced the completion of a direct reduction pellet feed (“DRPF”) project feasibility study (the “Study”), which evaluated the reprocessing and infrastructure required for the commercial production of up to 69% Fe DRPF product. The Study evaluated the modifications needed to upgrade the Bloom Lake Phase II plant production to DRPF iron ore, with an average life of mine production of approximately 7.5 Mtpa of up to 69% DRPF quality iron ore, which would be one of the highest DRPF quality products available on the seaborne market. The Study estimated that approximately 30 months are required to upgrade the Phase II plant and infrastructure, at an approximate cost of \$470.7 million. In April 2023, Champion’s Board approved a cumulative budget of \$62 million to advance the project over the course of 2023, and to secure the estimated project timeline.

FIGURE 2. CHAMPION PARTIAL STRUCTURE AS OF 31 MARCH 2023



As of March 31, 2023, Champion employed 1,023 employees across Canada, including 1,013 permanent employees, 5 other collaborators (including non-permanent employees working on contract), and 5 interns. Not including other collaborators and interns, there are 96 people employed at the Montréal administrative head office (including 34 women and 62 men), and 927 people employed at the Bloom Lake mine site (including 87 women and 840 men). Approximately 99% of our workforce is employed on a permanent basis, and 62.2% of our workforce is unionized (up from 60% last year). We also regularly engage contract workers at the mine, and during the reporting period, over 3,546 contract workers entered the site. Details on age group and numbers of Indigenous workers are disclosed in our Sustainability Report 2022, which is available on our website at <https://www.championiron.com/>. During the 2023 financial year, we hired a new Chief Financial Officer, Donald Tremblay, and Vice-President, Supply Chain, Dominic Boulianne .

In addition to our economic activities, we seek to make important contributions to local and Indigenous communities, where we operate through both social investment and charitable engagement with local community organizations. Our community investments are guided by an Impact and Benefits Agreement (“IBA”) completed in 2017, which establishes and consolidates a strong constructive partnership with Indigenous partners. Through our IBA commitments, Champion enables local communities to manage projects and programs that enhance socio-economic development and create benefits and lasting value that will continue even after the mine closes. Our IBA-related community investment spending totalled C\$6.8 million in FY23.



OUR POLICIES AND GOVERNANCE

The Company's Board of Directors is responsible for establishing and maintaining appropriate corporate governance practices for the Champion group of companies, including on the subject of modern slavery. The Board of Directors is also accountable for ensuring that all business practices comply with the applicable law, regulations, and the group's code of conduct and other applicable policies, including human rights, environment, responsible procurement, occupational health and safety, and prevention of harassment and discrimination at work policies. This includes ensuring proper risk assessment systems are in place to mitigate the risk of modern slavery or human trafficking in Champion's business activities and business relationships.

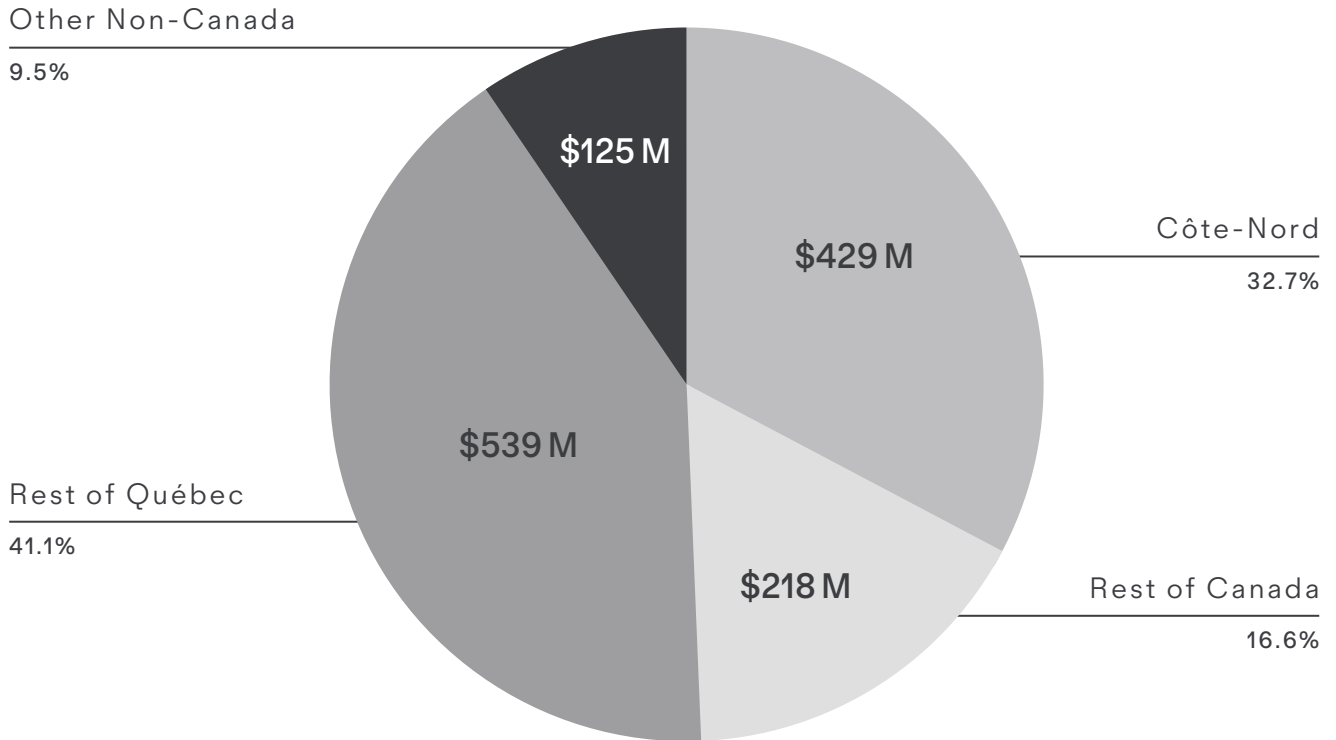
During the reporting period, the duties of the sustainability and indigenous affairs ("SIA") committee were updated to include reviewing community and social risks, health and safety risks, environmental risks and the management of climate-change issues. The board of directors and its committees meet at least quarterly and are briefed on issues related to the Company policies. Our policies are reviewed annually to ensure their ongoing relevance and alignment with our overall business strategies and changes to the internal and external operating context. The last update was completed in January 2023 as part of the process to review corporate governance policies to ensure best practices are in place, or are implemented.

OUR SUPPLY CHAIN

A diverse supply chain supports our business, providing goods, materials and services required at different stages of our value chain. The Company tends to maintain ongoing relationships with its largest and most significant suppliers as trusted partners that are key to its success. The Company's industrial operations are supported by 873 Tier 1 registered suppliers, including 808 suppliers located in Canada, and 65 suppliers located abroad, representing C\$1,311M of total spend. 90% of our Tier 1 annual spend, amounting to C\$1,186M, is contracted to our Canadian suppliers.

Much of our Canadian spend is within Québec. For example, our lead engineering firm is a Québec based company and most of our external advisory firms are also Québec based. In line with our aim to create economic opportunities in the region where we operate through the procurement of local products and services, during the reporting period, C\$429M was contracted to companies with a local business unit in the Côte-Nord du Québec region where the Bloom Lake Mine complex (Figure 3) is located. Moreover, in an effort to support Indigenous businesses in our operating area, C\$15M was procured from Indigenous suppliers.

**FIGURE 3. CHAMPION TOTAL PROCUREMENT
(INCLUDING CANADIAN AND NON-CANADIAN)**

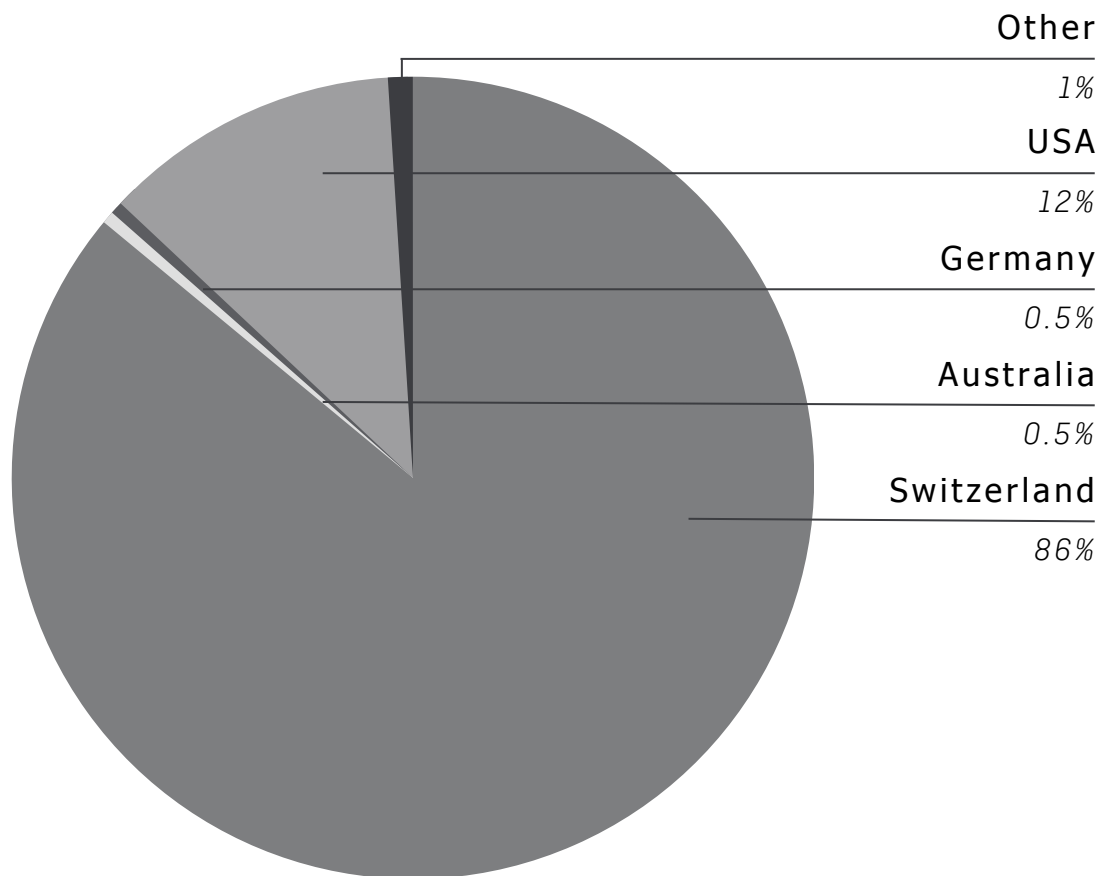


The remaining ten percent of our annual Tier 1 direct expenditures represent our non-Canadian spend. Of this, 99% is primarily sourced from suppliers located in Switzerland, Australia, Germany and the United States, with just one percent of all non-Canadian spend coming from other countries, including China, Spain, France, Japan, Senegal and the United Kingdom (Figure 4). The majority of our non-Canadian spend is from Switzerland, and relates to seafaring services for the transportation of our product to our overseas customers.

In line with the commitments made in the last year’s Modern Slavery Statement, during the reporting period, we conducted an annual review of our modern slavery risk assessment, which identified high-risk geographies and categories, in relation to our operations and supply chain. The Company recently began the process of upgrading our procurement practices, which will include a mapping of the supply chain in the near term.



FIGURE 4. CHAMPION'S DIRECT SUPPLIER COUNTRY SOURCES (NON-CANADIAN)



Our direct supply chain costs for the reporting period consisted primarily of expenditures supporting our mining operations, the completion of the Phase II expansion project, and exploration activities. This included transportation (land, air, rail and maritime), contract labour (e.g., maintenance, construction and drilling services), mining equipment and processing, spare parts, consumables, and fuel for our onsite operations. The major change in our procurement expenditures and mix between the 2022 and 2023 financial year reporting periods is the decrease in our construction expenditures as we completed the majority of expenses in relation to our Phase II expansion project at Bloom Lake in May 2023.

There was also an increase in our transportation costs associated with our increased production. Support for our activities not directly linked to mining gave rise to smaller expenditure categories, including support supplies such as staff costs, professional services (e.g., consultants and engineering), and cleaning and security.

IDENTIFYING OUR MODERN SLAVERY RISKS

IDENTIFYING OUR OPERATIONAL RISKS

Champion is headquartered in Australia, and Champion's single operational site and various exploration sites are all located in Canada, with its Canadian head office located in Montréal. The vast majority of our labour force - employed, contracted and subcontracted - is employed and protected under the employment laws of Canada and Québec, with which the Company complies. Canada is one of the few countries globally that have enacted labour laws that protect all workers across all sectors, including informal sectors.

Although the global mining industry is considered high risk for instances of modern slavery, because Champion's mining operations are in Canada, our social and political operating context presents minimal modern slavery risks. According to the Global Slavery Index, Canada has both a very low prevalence of, and vulnerability to, modern slavery.

The isolated nature of work associated with fly-in-fly-out ("FIFO") operations has been identified as possibly increasing risks of modern slavery within the global mining industry. While there is a high percentage of FIFO workers within Champion's operations, our FIFO schedule is comparable to regional peers. Our employees and contractors working on site are provided with housing and access to recreational facilities and are not required to remain on site outside of working hours.

All of our social investment activities, including our local community investment initiatives guided by our IBA agreement, and our charitable contributions, are undertaken in Canada. As such, Champion assesses its risk of causing, contributing to, or being directly linked to instances of modern slavery in such activities as also being minimal. Nonetheless, as our growth continues, we will re-evaluate risks related to human rights as needed.



IDENTIFYING OUR SUPPLY CHAIN RISKS

During the 2023 financial year, we undertook a modern slavery risk assessment that built upon our previous initial human rights impact self-assessment, which was guided by the *United Nations Guiding Principles Reporting Framework* that covered 32 internationally recognized human rights. The risk assessment drew on best practices and intergovernmental resources for the mining industry, exploring sector and industry risks, product and service risks, geographic risks, and business model risks. Additionally, it explored whether these risks were of the Company causing, contributing to, or being directly linked to modern slavery risks.

As is common in the extractives sector, the assessment revealed that the areas of greatest modern slavery risk are within the supply chain, where we have less visibility and direct control. This includes factors such as low visibility on worker access to grievance mechanisms beyond the mine site and sourcing, in particular the manufacturing of Champion's purchases and imported products.



The assessment also highlighted the mitigating value of aspects such as strong labour laws, unions, workplace policies and the prioritizing of local procurement.

Champion reviews its modern slavery risks annually. Our latest annual review considered external references and publications, such as the Global Slavery Index, to identify and better understand any risks associated with modern slavery in the countries that directly provide Champion with goods and services. Our annual review highlighted three potential risks that could expose Champion to modern slavery risks through our value chain. This includes the possibility that supply chain disruptions can expose us to suppliers with potentially less stringent human rights standards, the possibility that migrant workers may face abuse somewhere in our value chain, and finally, that there may be weaker governance in some jurisdictions within our value chain.

Our responsible procurement policy guides all procurement practices undertaken by Champion and its subsidiaries. Nonetheless, the Company recognizes the risks of modern slavery within its supply chain, in particular from suppliers outside of Canada, although such sourcing represented only ten percent of our total Tier 1 annual purchases during the 2023 financial year. The Global Slavery Index categorizes the supplier countries representing 99% of our non-Canadian purchases, namely Switzerland, the United States, Germany, and Australia, as all having low risks of modern slavery. No modern slavery practices were identified or reported within our operations nor our supply chain during the reporting period.

The Australian Council of Superannuation Investors lists sector-specific high-risk product and service categories, including cleaning, security, maintenance, labour hire/contract labour, logistics/transport, IT hardware, and consumables/materials. Drawing upon such sources, Champion identified the product and service categories that are most likely to be linked to modern slavery in our context, and accordingly, need to be considered as potentially high-risk (Figure 5). The product and service categories identified as presenting the potential for Champion to cause, contribute or be directly linked to modern slavery are also among those that represent a large proportion of our Tier 1 suppliers:

- Transportation (34%)
- Construction (16%)
- Contract labour (6%)



Although these product and service categories are considered potentially high risk in a global context, given that our operations are in Québec, Canada, the potential for the Company to cause, contribute to, or be directly linked to modern slavery is mitigated by the provincial and federal laws that regulate the construction and transportation industries, and the employment laws governing the hiring of contract labour.

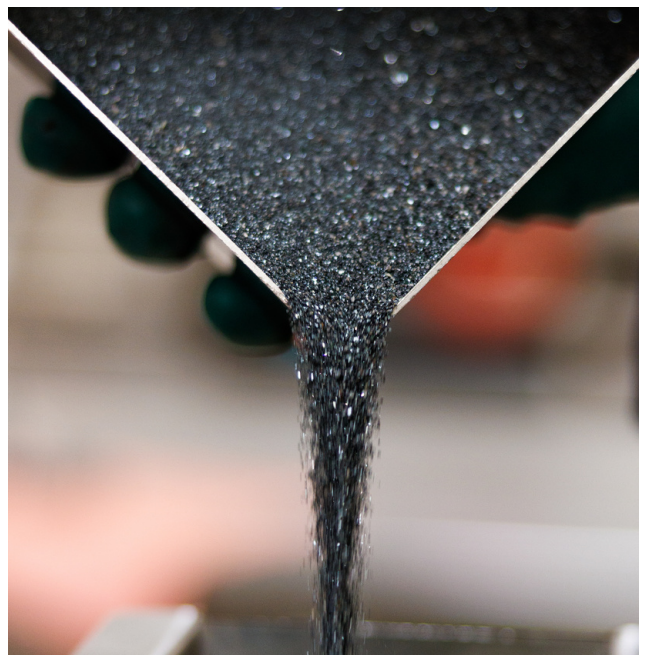


FIGURE 5. CHAMPION'S SECTOR ANALYSIS OF TIER 1 SUPPLIERS

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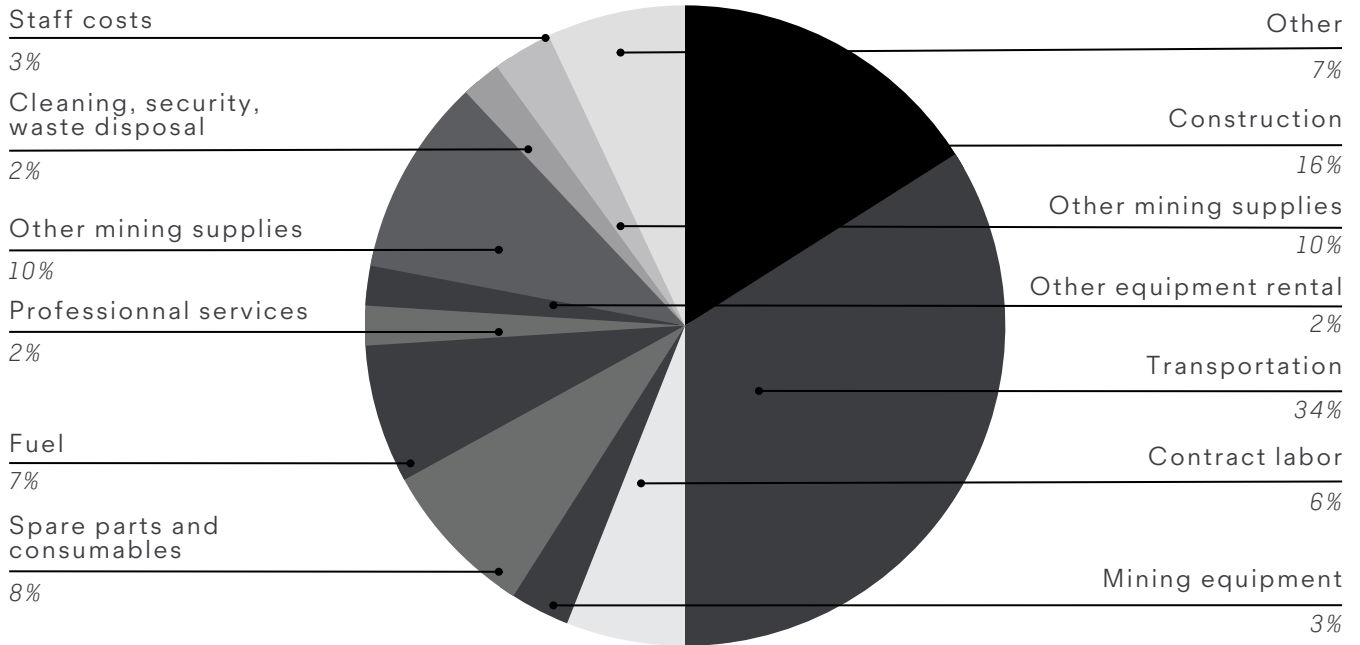
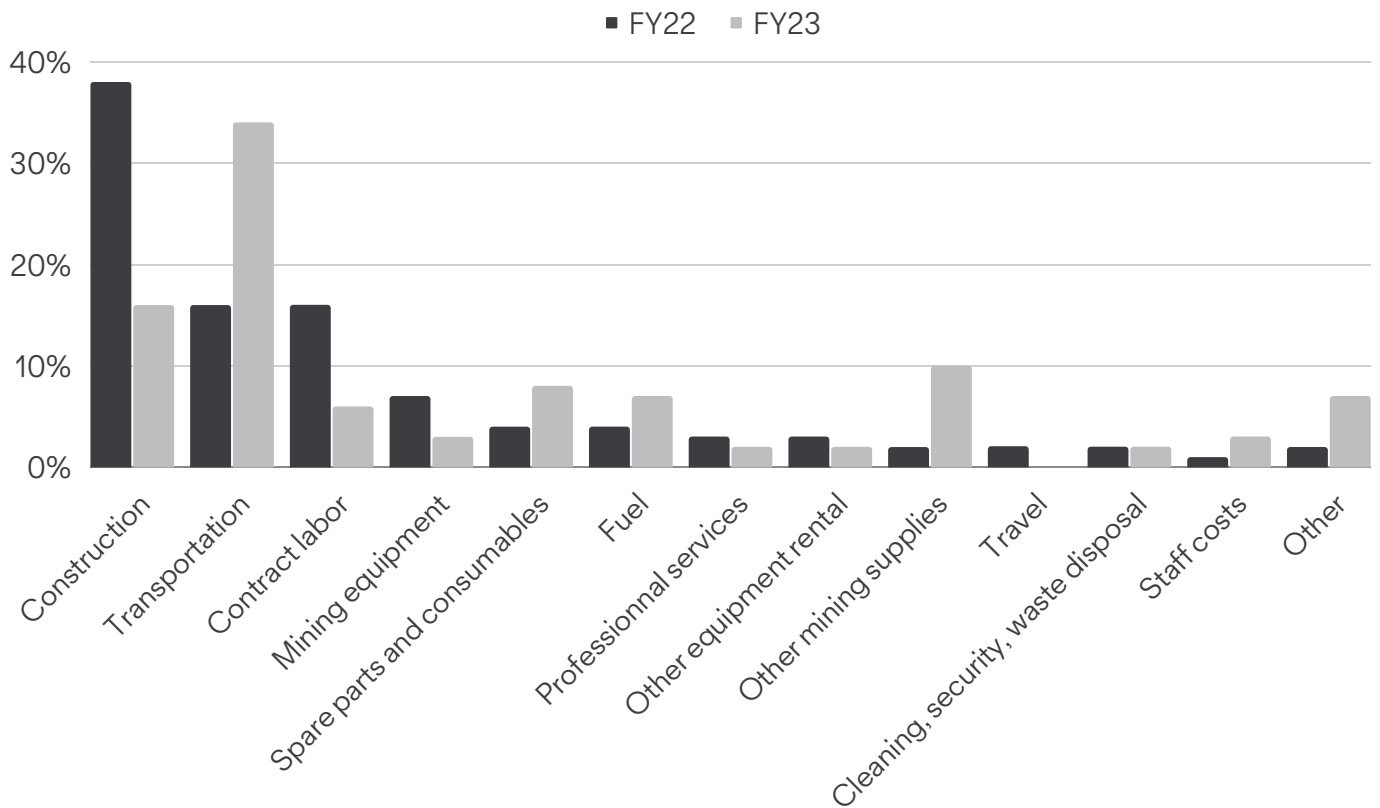


FIGURE 6. CHANGE IN PROCUREMENT CATEGORIES BETWEEN REPORTING PERIODS



All hiring of our contract employees is governed by Québec and Canadian labour laws. Construction workers formed the largest portion of the Company's contract labour force during the reporting period. All contract workers, including temporary contracted workers and employees of on-site contractors who are engaged in construction, are unionized, as is required by law in Québec. In addition, employees of Champion's largest facilities management subcontractor are also unionized.

In addition to the responsible procurement policy, suppliers providing contract labour are required to comply with QIO's operational health and safety policies and procedures, and are included in related internal audits. Further, in line with our responsible procurement policy, they are encouraged to develop and employ policies similar to Champion's Code of Conduct (the "Code"), as well as our human rights policy, which was developed in line with the *UN Guiding Principles of Business and Human Rights*.

Our product transportation costs primarily include land and rail transportation, as well as maritime shipping. Land and rail transportation have a recognized lower risk of modern slavery compared to maritime transport. The rail transport companies we engage also currently have collective agreements in place governing their engagement with their workforce.

As the international shipping industry is challenging for regulators to oversee, sea freight, which is utilized to transport most of our overseas exports, is recognized as having a heightened risk of exploitative labour practices. These include poor living and working conditions, remuneration below minimum wage, withholding of crew wages, lack of access to grievance mechanisms and the right to freedom of association.



We strive to mitigate these risks within our supply chain by seeking to partner with companies committed to protecting the wellbeing of their employees. For example, the employees of the operator responsible for transporting the largest portion of our ore are part of a union that is a member of the International Transport Workers' Federation ("ITF"). The ITF Seafarers Association specifically works to protect the employment, legal, trade union, and human rights of seafarers.

Our transportation costs also include charter flights provided by the largest airline carrier for specialized commercial charter flights in Canada. As a "United Nations Approved Carrier" it is aligned with the *United Nations Supplier Code of Conduct*, which has explicit provisions for freedom of association and collective bargaining, forced or compulsory labour, child labour, discrimination, wages, working hours and other conditions, and health and safety.

Tier 2 suppliers, an analysis of which has not yet been undertaken, may present a risk for modern slavery. Upstream manufacturing processes or third-party raw material sourcing by our suppliers could occur in countries with less stringent governmental oversight and due diligence processes than Australia or Canada, or where the complexity of supply chains makes visibility beyond Tier 1 challenging. Examples of products used that could fall into this category include garments (such as personal protective equipment and uniforms, and the raw materials used to make them); electronics components, technology and hardware (including computers and mobile phones which may contain conflict minerals);¹ and rubber products (including tires, conveyor belts and rubber gloves, the rubber for which is sourced from third party suppliers, where child or forced labour are a risk).

As part of our dedication to continuous improvement, we continued to update our procurement and vendor management practices, and we plan to map our procurement spending in the next reporting period.



¹ The 2022 Global Slavery Index considers electronics and garments as the top two products at risk of modern slavery that are imported into the G20.

IDENTIFYING RISKS ASSOCIATED WITH COVID-19

The COVID-19 pandemic continued to impose operational challenges during the first half of the 2023 financial year, while also continuing to impact the global economy, creating significant economic uncertainty. Reduced economic activity and changes to supply chains during the pandemic had contributed to job losses and pushed millions into poverty, increasing their vulnerability to modern slavery. In particular, modern slavery risks have become heightened amongst migrant workers and in sectors where demand has surged due to the pandemic, such as personal protective equipment and medical supplies.

As reported in our 2022 Modern Slavery Statement, drawing on guidance provided by the Australian Department of Home Affairs regarding the effects of the pandemic on modern slavery risks, during the 2022 financial year we investigated how COVID-19 impacted or changed our risks related to modern slavery. We did not identify any significant changes to our supply chain caused by the pandemic, with the exception of purchasing personal protective equipment. We also increased lead times in order to reduce pressure on our suppliers as they dealt with COVID-19 challenges. The analysis did not reveal any increase in our exposure to modern slavery risks.

During the reporting period, there were some minor changes to our purchasing practices. We made arrangements with some of our vendors to open branches closer to Fermont, where the Bloom Lake mine is located, which indirectly allowed us to further contribute to the local economy, and did not result in any changes in our exposure to modern slavery.



ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISKS

At Champion, respecting human rights is central to our efforts to contribute meaningful and ongoing social value to our stakeholders. We expect the businesses we work with to make a similar commitment and to respect human rights throughout their supply chain. The Company believes that it has a responsibility to work collaboratively with workers, suppliers, customers, communities, Indigenous partners and external stakeholders, to increase our understanding of modern slavery risks and the role Champion can play in managing them. We strive to identify, assess and manage risks, including human rights risks, throughout our value chain. Champion maintains a risk register of the highest perceived risks.

During the reporting period, we continued to focus on protecting our workers' health and wellbeing as the COVID-19 pandemic subsided while we completed our Phase II expansion. Nevertheless, important strides were made on certain modern slavery risk mitigation goals, including the updating and improvement of our procurement policies and processes. Following the completion of our Phase II expansion and the easing of COVID-19 restrictions, we focused on further maturing our capacity to assess and mitigate modern slavery risks within our workforce and operations.

As part of our continuous improvement efforts, and in order to better track the implementation of our relevant policies, during the reporting period we worked with an internationally reputable consulting firm to upgrade our procurement processes to more effectively take into account human rights considerations and modern slavery risks.

The most notable updates to our procurement processes include: reorganizing our procurement team, creating an inventory and purchasing dashboard, and establishing a formal business review process. We plan to employ the inventory and purchasing dashboard to map out our procurement spending and to identify the level of risk and the strategic nature of our relationship with each supplier. The risk level includes considerations towards human rights and modern slavery, in addition to other types of risks. The strategic importance of each supplier will be determined by their relationship to Champion (for example, a supplier that is the sole purchasing option will be considered highly strategic). The level of risk and strategic importance of each supplier will determine the frequency of our business review process, which includes a review of the supplier's exposure to modern slavery risks.

We are also continuing to review targeted policies such as the responsible procurement policy, with the goal of completing this review in our 2024 financial year, with implementation expected shortly thereafter.

Champion recognizes that companies can contribute to modern slavery through their procurement practices by prioritizing cost reductions in tender and vendor selection processes, which can inadvertently make a supplier and contractor workforce more vulnerable to rights-related risks. Though our tender processes do include cost, Champion also places high importance and weighting on quality, support, occupational health and safety history, and whether suppliers are local and Indigenous owned (Innu TakuaiKAN Uashat Mak Mani-Utenam).

In line with commitments made in our previous Modern Slavery Statement, during the reporting period, we also further strengthened our internal capacity to address modern slavery risks by implementing a human rights awareness campaign with all of our employees, and by undertaking an annual review of our modern slavery risks.

POLICIES AND PROCEDURES

Champion has a suite of policies and procedures to ensure that the Company is consistently addressing modern slavery risks throughout its business, operations and supply chain. Champion's policies and procedures relating to human rights and modern slavery apply to all subsidiaries that are part of the group, and are highlighted below.

As noted above under "Identifying our Supply Chain Risks", the review enabled us to better highlight several modern slavery risks.

We also undertook a gap assessment of our modern slavery approach, policies and processes, against industry leading practices. The gap assessment identified several actions that Champion could undertake to better align itself with its peers. This includes: increasing visibility in our supply chain regarding human rights; increasing visibility of our maritime freight operations; and seeking further engagement with our suppliers with respect to human rights.



CODE OF CONDUCT

The Code of Conduct outlines our commitment to respect and protect human rights throughout our operations. All employees are required to complete an online training certification of the Code after being hired. Management and employees also receive human rights training in parallel with the Code training, following the start of their employment with Champion and its controlled entities.

All employees are required to recertify, with a mandatory test every year while they continue to work for Champion and its controlled entities. In addition, employees are annually asked to electronically confirm their commitment to abide by the Code.

HUMAN RIGHTS POLICY

Rooted in the *United Nations Guiding Principles on Business and Human Rights*, and the *International Bill of Human Rights and the International Labour Organization (“ILO”) Core Conventions*, the human rights policy aligns our occupational health and safety procedures with human rights principles and ensures that no one is forced to perform work in unsafe conditions.

It also establishes clear prohibitions of the use of all forms of modern slavery within our operations and the operations of our suppliers. The human rights policy has been implemented in line with ILO Conventions 29, 138 and 182. In the event that Champion causes or contributes to adverse human rights impacts, the Company is committed to contributing to appropriate remedies.



In our work with our suppliers, Champion encourages them to adopt similar policies respecting human rights. The topic of human rights is included in our tender documentation, and the business review process we are currently implementing will include an assessment of suppliers' human rights and modern slavery policies.

As noted, in line with a commitment made in our 2022 Modern Slavery Statement, we undertook a gap analysis of our approach, policies and processes related to human rights and our modern slavery risks, benchmarking our practices against several of our peers.

RESPONSIBLE PROCUREMENT POLICY

Champion does not tolerate, nor facilitate, any form of modern slavery. Our responsible procurement policy promotes the respect for human rights within the Company's supply chain. This policy aims to provide guidelines fostering sustainable development in the purchasing, leasing and contract award practices of the Company.

Champion recognizes that its activities may impact human rights within its supply chain, especially internationally. However, we have zero-tolerance for any modern slavery from our suppliers, and are committed to avoiding being complicit in, or facilitating all forms of human rights violations in our supply chain.

Suppliers are required not to engage in any form or practice of modern slavery as described in Australia's *Modern Slavery Act 2018*, and in compliance with the *ILO Forced Labour Convention (No. 29)*. The policy states that no work or service is to be exacted from any person under threat of punishment, and that no individuals must be forced to perform any work or service against their will.

The policy also explicitly prohibits any engagement in human trafficking.

A complete review of the responsible procurement policy is planned for our 2024 financial year, with implementation expected shortly thereafter.



WHISTLEBLOWER POLICY

The whistleblower policy establishes procedures for the confidential and anonymous submission, receipt, retention and treatment of complaints or concerns. Whistleblower concerns are handled through a third-party reporting system provided by Deloitte. Individuals can also report incidents directly to Steve Boucratie, Senior Vice-President, General Counsel and Corporate Secretary of the Company.

Concerns or reports regarding accounting matters can be directly reported to the Chair of the Audit Committee. The policy specifically prohibits any retaliation against individuals who make a report of known or suspected violations in good faith.

FLEXIBLE WORK POLICY

With the goal of providing our employees with a work environment that is safe, healthy, productive, and efficient, Champion implemented a policy designed to facilitate remote work. The policy aims to establish procedures for setting flexible schedules and establishing a flexible work environment. The policy also defines dress codes, and establishes managerial oversight responsibilities.

All of these documents are publicly available with the exception of the employee grievance mechanism and the flexible work policy, which have been developed as internal mechanisms. The code of conduct, human rights policy, procurement policy, prevention of harassment and discrimination in the workplace policy, and whistleblower policy can all be viewed on our website at www.championiron.com.



GRIEVANCE MECHANISMS

All employees can report an issue in which human rights appear to have been violated to their immediate supervisor, a representative of the Human Resources department, their Union representative, or to a designated independent third party, without fear of reprisals, if the report is made in good faith. Champion is committed to addressing and remedying human rights violations within its operations.

We enhanced our operational community feedback mechanism during our 2023 financial year to strengthen our human rights management approach and to broaden the channels for receiving critical feedback about our business activities. The mechanism includes access via the Company's website in both English and French. This allows members of host communities to remotely lodge complaints and share concerns with our management team, including the option of doing so anonymously. A dedicated email address for this purpose is consistently monitored, and a responsible manager is charged with monitoring each complaint until a resolution is achieved.



PREVENTION OF HARASSMENT AND DISCRIMINATION IN THE WORKPLACE

Champion does not tolerate any form of harassment or discrimination towards or between its employees, contractors and subcontractors, and is dedicated to preventing and stopping any form of psychological or sexual harassment, including any form of discriminatory harassment. The prevention of harassment and discrimination in the workplace policy also establishes principles that must be followed when harassment complaints are reported or filed with a Company representative.

We encourage all subcontractors employed by the Company to adopt a similar policy for their workforce. The Company also encourages anyone, including subcontractors and their employees, to report any instances of harassment or discrimination they may witness to the Whistleblower hotline.



TRAINING

The Code of Conduct training is required for all new employees. Since the Code of Conduct requires all employees and third parties providing us with goods or services to respect human rights, the training includes content on human rights and discrimination. All employees are required to renew Code of Conduct training annually, including mandatory testing. This process is designed to ensure compliance and a consistent understanding of human rights and related policies by the Company's workforce.



RAISING AWARENESS ABOUT HUMAN RIGHTS

During the reporting period, the Company acted on a training opportunity that had been identified as part of our modern slavery risk assessment during the 2022 financial year. Accordingly, we completed an awareness campaign on human rights, which extended to all our employees, including executives.

We used our internal communications to provide employees with an information video and educational materials on human rights topics including modern slavery through the Company's intranet. Employees were encouraged to consult these materials in order to improve their understanding of human rights, and of how our operations may impact human rights.



BUSINESS REVIEW PROCESS

Prior to this reporting period, we had piloted a supplier questionnaire process to use in internal auditing processes. The questionnaire considered whether suppliers have processes in place to guarantee the respect of human rights. As part of our updates to our procurement processes, we are replacing these pilot supplier questionnaires with our novel business review process. The process is a more flexible tool that considers a partner's level of risk and strategic importance to our business, and includes considerations of human rights and modern slavery. As noted, we will employ our procurement dashboard to identify how often suppliers will be subject to review, based on their level of risk, their strategic value to Champion, and the size of their procurement contracts.

The business review process will be used to identify the human rights and modern slavery risks associated with any supplier, which will in turn be used to adjust their overall risk rating within our dashboard. For new suppliers, we plan to implement an audit pre-qualification process which will include a thorough survey of the supplier's operations, including a site visit, to ensure that we are well acquainted with their operations, inclusive of any exposure to modern slavery risks.



MITIGATING RISKS OF COVID-19

Since the beginning of the COVID-19 pandemic, Champion has sought to better understand potential new modern slavery risks associated with our operations and supply chain. Our risk assessment and management approach in this respect drew on both ongoing experience as well as external resources, such as an industry guide from the Minerals Council of Australia, and Pillar Two, which focused on helping mining companies to identify and manage modern slavery risks associated with the COVID-19 pandemic. The Company has consistently and proactively deployed measures to protect its workforce and mitigate risks related to COVID-19, in line with or exceeding the Government of Québec's guidelines.

This included establishing a COVID-19 testing laboratory at Bloom Lake to mitigate the risks related to the pandemic and to limit the spread of COVID-19. During the reporting period, there were no workforce changes or work stoppages related to COVID-19.

The most significant impact of COVID-19 during the year was related to federal regulations requiring all airline passengers to be vaccinated against COVID-19. Since not all of our fly-in-fly-out staff met this requirement, we experienced limitations in our ability to transport all our workers to the Bloom Lake site.

Following the decline of the pandemic over the course of 2022, we closed our COVID-19 testing laboratory. However, we have chosen to maintain the lab's infrastructure to enable a potential reopening within 24 hours if required to mitigate future risks to our people and communities.



ASSESSING OUR EFFECTIVENESS

This is our fourth Modern Slavery Statement. Champion believes that it is adopting and maturing risk management practices that are commensurate with the level of modern slavery risks associated with our business activities. We believe the Company and its controlled entities are addressing our modern slavery risks in line with industry and government standards, and are meeting the expectations of our stakeholders.

In future years, we will continue to assess our performance, and that of our controlled entities, through both existing and new measures such as the responsible procurement policy, human rights training, business review process, and due diligence, as detailed in our Future Actions section. We will ensure that our practices meet any evolving regulatory requirements in both Australia and Canada, including any amendments to *Australia's Modern Slavery Act 2018*, and Canada's upcoming *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.



CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Champion developed this statement in consultation with its operating subsidiary, Quebec Iron Ore, also a reporting entity for the purposes of this statement. Champion consulted with key areas of our business to prepare this statement, including Legal, Procurement and Human Resources. These teams operate across all business functions for both Champion and Quebec Iron Ore.

The Senior Leadership members for both entities also reviewed the statement. The signatory of this statement, Mr. David Cataford, is the Chief Executive Officer and Director of Champion as well as Chief Executive Officer and Director of Quebec Iron Ore, and all controlled entities of Champion and its subsidiaries including Quebec Iron Ore.



LOOKING FORWARD

Champion strives to work with our stakeholders to ensure that no individual is subjected to modern slavery from our operations or within our supply chain. During the current period, and as part of our commitment to continuous improvement, we will continue to advance commitments identified in our 2022 Modern Slavery Statement. Overall, these efforts seek to further identify, assess, address, and remedy our modern slavery and human rights risks, including:

SUPPLIER ENGAGEMENT

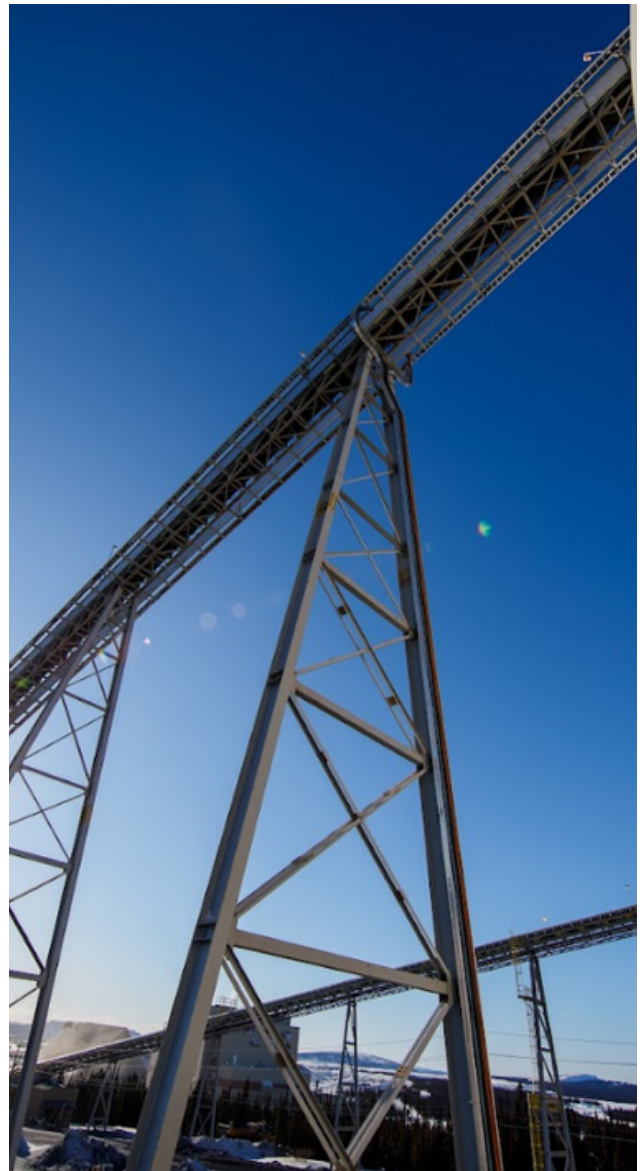
- Continue to implement and monitor the effectiveness of our responsible procurement policy;
- Continue to review our responsible procurement policy in FY24, with completion and implementation expected shortly thereafter;
- Continue the updating of our procurement processes to better track implementation of the responsible procurement policy; and
- Continue to integrate human rights and modern slavery provisions in vendor pre-qualification and/or onboarding processes;

RISK ASSESSMENT AND MANAGEMENT

- Continue to assess the risks and performance of our primary suppliers through our business review process;² and

DUE DILIGENCE

- Continue to conduct annual reviews of our modern slavery risk assessment; and
- Continue to mature our supplier due diligence and internal audit processes to better identify, prevent, and mitigate modern slavery risks.



² This replaces our previous commitment to assess the risks and performance of our Tier 1 suppliers through annual supplier risk assessment.

IMPORTANT NOTICE

This statement includes certain information and statements that may constitute “forward-looking information” under applicable Canadian and Australian securities legislation. All statements other than statements of historical facts included in this statement that address future events, developments or performance that Champion expects to occur, including, without limitation, expectations regarding (i) the project to upgrade the Bloom Lake iron ore concentrate to a Direct Reduction (“DR”) Pellet Feed quality iron ore, expected project timeline, capex, budget and financing, production metrics and benefits; (ii) the Kami Project's feasibility study and its anticipated completion date; (iii) the study to produce DR grade pellets in Pointe-Noire and its anticipated completion date; (iv) the Company's sustainability objectives, social matters and governance, implementation of related initiatives and expected results thereof; (v) creating stakeholder value; (vi) the risk of causing, contributing to or being directly linked to instances of modern slavery; (vii) the results of Champion's efforts to identify, assess, address, and remedy modern slavery and human rights risks through its initiatives (including business review process and review of our policies and practices); (viii) advancing commitments identified in our 2022 Modern Slavery Statement and other commitments related to modern slavery and human rights risks. Forward-looking statements are statements that are not historical facts and are generally, but not always, identified by the use of words such as "plans", "expects", "is expected", "budget", "scheduled", "estimates", "continues", "forecasts", "projects", "predicts", "intends", "anticipates", "aims", "targets" or "believes", or variations of, or the negatives of, such words and phrases, or state that certain actions, events or results "may", "could", "would", "should", "might" or "will" be taken, occur or be achieved. Although Champion believes the expectations expressed in such forward-looking statements are based on reasonable assumptions, such forward-looking statements involve known and unknown risks, uncertainties and other factors, most of which are beyond the control of the Company, which may cause the Company's actual results, performance or achievements to differ materially from those expressed or implied by such forward-looking statements. Factors that could cause the actual results to differ materially from those expressed in forward-looking statements include those factors discussed in the section entitled “Risk Factors” in the Company's 2023 Annual Information Form and the MD&A for the financial year ended March 31, 2023, all of which are available on SEDAR+ at www.sedarplus.ca, the ASX at www.asx.com.au and the Company's website at www.championiron.com. There can be no assurance that such information will prove to be accurate, as actual results and future events could differ materially from those anticipated in such forward-looking information. Accordingly, readers should not place undue reliance on forward-looking information.

All of Champion's forward-looking information contained in this document is given as of the date hereof and is based upon the opinions and estimates of Champion's Management and information available to Management as at the date hereof. Champion disclaims any intention or obligation to update or revise any of its forward-looking information, whether as a result of new information, future events or otherwise, except as required by law. If the Company does update one or more forward-looking statements, no inference should be drawn that it will make additional updates with respect to those or other forward-looking statements. Champion cautions that the aforementioned list of risks and uncertainties is not exhaustive. Investors and others should carefully consider the above factors as well as the uncertainties they represent and the risks they entail. Inherent in forward-looking statements are risks, uncertainties and other factors beyond the Company's ability to predict or control. The forward-looking statements contained herein are made as of the date hereof or such other date or dates specified in such statements.

REFERENCES

Australian Border Force. Nd. Modern Slavery Act Information Sheet: Coronavirus.

Australian Council of Superannuation Investors. 2019. Modern Slavery Risks, Rights and Responsibilities: A Guide for Companies and Investors.

Australian Human Rights Commission and KPMG. 2021. Resources, Energy and Modern Slavery: Practical Responses for Managing Risk to People.

Department of Home Affairs, Australian Government. 2018. Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities.

Department of Home Affairs, Australian Government. 2020. Modern Slavery Act: Information for Reporting Entities about the Impacts of Coronavirus

Ethical Trading Initiative and Ergon. Nd. Managing Risks Associated with Modern Slavery: A Good Practice Note for the Private Sector.

The Parliament of the Commonwealth of Australia. 2018. Modern Slavery Bill; Explanatory Memorandum.

United Nations Human Rights Office of High Commissioner. 2011. UN Guiding Principles on Business and Human Rights. New York, Geneva.

Walk Free Foundation. 2022. The Global Slavery Index 2022.



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