

Modern Slavery Statement

Financial year ended March 31, 2025

20
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ABOUT THIS REPORT



This Modern Slavery Report (the “Modern Slavery Statement”, the “Report” or the “Statement”) has been prepared by Champion Iron Limited (the “Company” or “Champion”), to meet the requirements of the Australian Modern Slavery Act 2018 (The “Australian Act”) and the 2023 Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Canadian Act”) for the financial year ended March 31, 2025 (“FY2025”). This is a joint Modern Slavery Statement covering Champion Iron Limited, its wholly owned subsidiary, Quebec Iron Ore Inc. (“QIO”) and its other subsidiaries. All references to our, we, us, the Company, and Champion refer to Champion Iron Limited (ABN 34 119 770 142), QIO and all entities owned and controlled by the Company. References to “modern slavery” in this document pertain to the types of exploitation defined by the Australian Act 2018, including severe human rights violations such as slavery, servitude, forced labour, human trafficking, and all forms of child labour as outlined in the Australian Act.

In line with the Canadian Act, we define child labour as labour or services provided or offered to be provided by persons under the age of 18 years, and under circumstances dangerous to the child. We define forced labour as labour or services provided or offered to be provided involuntarily by a person under the menace of any direct and indirect penalty or under circumstances that could reasonably be expected to cause the person to believe their safety, or the safety of a person known to them would be threatened.

During the reporting period, no occurrence of modern slavery, child or forced labour was identified by our teams or reported to us by a third-party.

All references to “year” refer to the financial year ending March 31, 2025, 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.

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 Report has been approved by Champion’s Board of Directors pursuant to subparagraph 11(4)(b)(ii) of the Canadian Act on behalf of the Company and QIO. In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I, David Cataford, attest that I have reviewed the information contained in this Report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed above.

I make the above attestation in my capacity as a member of the Board of Directors of Champion Iron Limited, and not in my personal capacity, for and on behalf of the Board of Directors of Champion Iron Limited.

I have the authority to bind Champion Iron Limited.

(s) David Cataford

DAVID CATAFORD
CHIEF EXECUTIVE OFFICER
DATE: MAY 28, 2025 (MONTRÉAL) /
MAY 29, 2025 (SYDNEY)

FY2025 ACTIONS TO MITIGATE MODERN SLAVERY RISKS

KEY ACTIONS:



Conducted a review and assessment of our FY2024 modern slavery related risks, enabling our Company to foster its commitment to ethical practices and mitigate risk exposure;



Continued to deploy the Company's rigorous supplier assessment process, aimed at identifying and addressing potential modern slavery risks throughout our supply chain;



Updated and implemented the Company's procurement process and reviewed the Company's Responsible Procurement Policy to ensure ethical sourcing and social responsibility; and



Committed to respond to community grievances within 30 business days and successfully achieved this KPI for 100% of the complaints received during the reporting period.



COMMITMENT PROGRESS AND TARGETS

	Previous Commitments	FY2025 Status	Looking Forward
Supplier engagement	Continue to implement, monitor and review the effectiveness of our Responsible Procurement Policy and process.	We diligently reviewed our Responsible Procurement Policy to ensure ongoing implementation to reduce our exposure to modern slavery risk.	Continue to annually monitor and review the Responsible Procurement Policy.
	Continue to integrate human rights and modern slavery provisions in vendor pre-qualification and onboarding processes.	During the reporting year, we conducted 16 business review assessments in which we discussed human rights and modern slavery risks.	Review the process and adapt it to align with best practices that help reducing our risks and exposure to modern slavery.
Risk Assessment and Management	Continue to assess the risks and performance of our Tier 1 suppliers ¹ .	We conducted research focusing on our suppliers in high-risk countries, as identified by the Global Slavery Index .	Continue to audit new suppliers to ensure business diligence and expand our assessment to have more visibility on our supply chain.
Due Diligence	Continue to conduct annual reviews of our modern slavery risk assessment.	We reviewed our modern slavery risks, which have not changed significantly year-over-year. Additionally, we conducted an annual review of imported goods and importing countries to assess the level of risk associated with these industries and countries.	Continue to conduct annual reviews of our modern slavery risk assessment.
	Continue to improve our supplier due diligence and internal audit processes to better identify, prevent, and mitigate modern slavery risks.	We initiated research on our suppliers' countries of operation based on their modern slavery score according to the Global Slavery Index .	Optimize our screening process and mapping of our supply chain.
	Conduct a study to understand our downstream exposure to modern slavery by analyzing our sales to customers operating in regions deemed at risk of forced or child labour.	We conducted research to analyse our downstream exposure to modern slavery risks based on geographic risks.	Review our process and align with best practices in human rights due diligence to mitigate our risks.

¹ A Tier 1 supplier is defined as a company that directly provides services or goods, either produced or redistributed by them, to Champion.

OUR STRUCTURE, BUSINESS AND SUPPLY CHAIN

OUR ORGANIZATIONAL STRUCTURE AND OPERATIONS

Champion is an iron ore exploration, development and production company with 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).

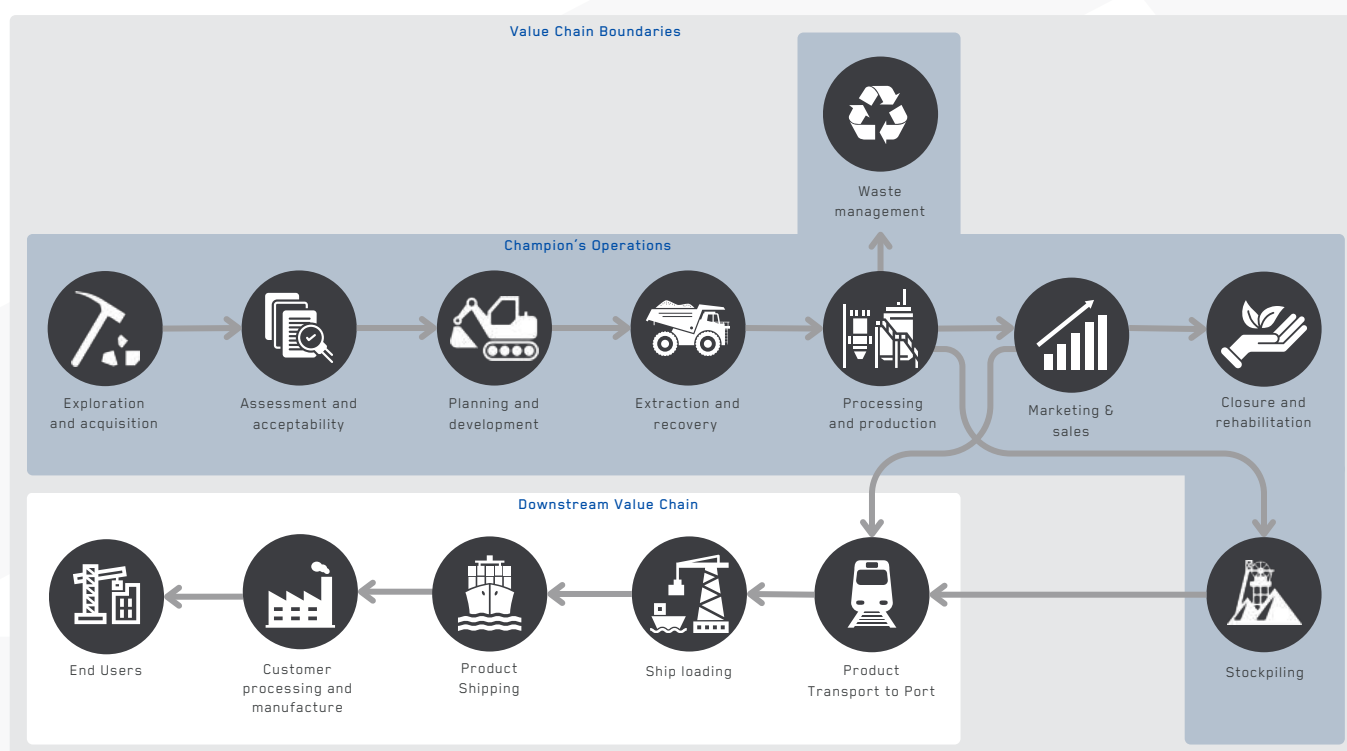


Champion is domiciled in Australia at 91 Evans Street, Rozelle NSW, and its principal administrative office is located at 1155 Rene-Levesque Boulevard West, Suite 3300, Montréal, Québec, Canada. Through its 100%-owned subsidiary, QIO, Champion owns and operates the Bloom Lake mining complex ("Bloom Lake"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

In addition, Champion also owns the Kami Project, a few kilometres from Bloom Lake in Newfoundland and Labrador. On December 18, 2024, Champion entered into a binding agreement with Nippon Steel Corporation ("Nippon") and Sojitz Corporation ("Sojitz") to form a partnership for the joint ownership and potential development of Kami². Champion's operating Bloom Lake mine has a nameplate capacity of 15 million wet metric tonnes ("WMT") per annum of high-purity 66.2% Fe iron ore concentrate with low contaminants. In January 2024, the Company made a final investment decision for the Direct Reduction Pellet Feed ("DRPF") project, committing over \$470 million to the project. The DRPF project will enable the Company to produce DRPF iron ore concentrate at up to 69% Fe, which is an essential material in the industry's transition to low emission steelmaking via direct reduced iron and electric arc furnaces.

Further to completed work programs and construction activities, the DRPF project's commissioning is estimated to occur in December 2025. Since 2018, Champion has sold its product to over 40 different steelmakers globally. Our operations are illustrated through a visual representation of our value chain below.

FIGURE 1. CHAMPION VALUE CHAIN



² For additional details, refer to Champion's press release dated December 18, 2024.

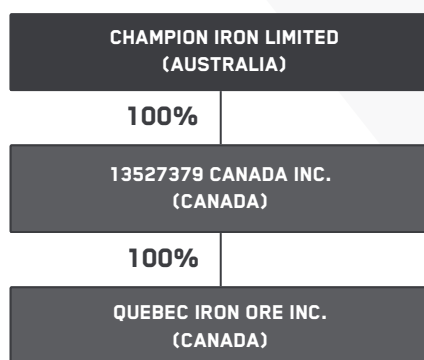
Following its acquisition of the Kami Project in 2022, Champion completed a study which evaluated the project's capability to produce a direct reduction ("DR") grade pellet feed iron ore. We published the study's results in January 2024 and filed the related technical report in March 2024. The Kami Project has a projected 25-year life of mine with an expected annual average DR quality iron ore concentrate production of approximately 9.0 Mtpa at 67.5% Fe. In 2024, the Company made progress on the environmental impact assessment required by the Government of Newfoundland and Labrador.

In December 2024, Champion entered into a binding agreement with Nippon and Sojitz to form a partnership for the joint ownership and potential development of Kami. This partnership highlights the Kami Project's potential to produce high-purity DR-grade iron ore concentrate, recognized as a critical mineral by the governments of Canada, Québec and Newfoundland and Labrador.

Nippon and Sojitz bring extensive expertise in decarbonization technologies and resource development, aligning with Champion's commitment to sustainability and innovation. Champion's participation in the Kami Project is through its wholly-owned subsidiary Champion Kami Partner Inc³. In addition, the head offices of both Nippon and Sojitz are located in Japan, one of the countries with the lowest prevalence of Modern Slavery in the world according to the Global Slavery Index.

The Company is also evaluating other growth opportunities within its portfolio, including a portfolio of exploration and development projects in the Labrador Trough, via its wholly-owned subsidiary Champion Iron Mines Limited.

FIGURE 2. CHAMPION'S SIMPLIFIED CORPORATE STRUCTURE AS OF MARCH 31, 2025



As of March 31, 2025, Champion employed 1,397 employees across Canada, including 1,307 permanent employees, 90 other collaborators (including non-permanent employees working on contract and interns). Including other collaborators and interns, there are 138 people employed at the Montréal administrative head office (including 54 women and 84 men), and 1,169 people employed at the Bloom Lake mine site (including 97 women and 1,072 men). Additionally, there are two employees based in Labrador. Approximately 94% of our workforce is employed on a permanent basis, and approximately 61% of our workforce is unionized. We also regularly engage contract workers at the Bloom Lake mine. During the reporting period, over 4,429 contract workers entered the site. Other than the board members of Champion, there is one employee domiciled in Australia.

Details on age groups and the number of First Nations workers are disclosed in our 2025 Sustainability Report, which is available on our website at <https://www.championiron.com/>. In addition to our economic activities, we seek to make important contributions to the local and First Nations communities where we operate through both social investments and charitable engagements.



³ For additional details regarding the Transaction, refer to Champion's press release dated December 18, 2024.



Our community investments are guided by an Impact and Benefits Agreement (“IBA”) adopted in 2017, which establishes and consolidates a strong constructive partnership with First Nations 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 mine closure. Our IBA-related community investment spending totalled C\$7.4 million in FY2025.

OUR POLICIES AND GOVERNANCE

Champion’s Board of Directors is responsible for establishing and maintaining appropriate corporate governance practices for Champion and its subsidiaries, including regarding modern slavery. The Board of Directors is also accountable for ensuring that all business practices comply with applicable laws, regulations, Champion group’s Code of Conduct (the “Code”) and other applicable policies, including our Human Rights, Environmental, Responsible Procurement, Health and Safety, and Prevention and Handling of Harassment and Discrimination in the Workplace policies. This includes ensuring that 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.

The Sustainability and Indigenous Affairs (“SIA”) committee, established in 2023, focuses on identifying community and social risks, health and safety risks, environmental risks and the management of climate-change issues when applicable on a quarterly basis. The committee reviews and approves any proposed changes to our sustainability policies to ensure they remain relevant and aligned with our evolving business strategies, internal operations, and the external operating context.

Our most recent review of our policies was completed in January 2025, and focused on our Human Rights and Responsible Procurement policies to confirm their effectiveness and compliance with the Australian Act and the Canadian Act.

During the reporting period, the Company has adopted a Tax Policy, which is available on our website. This policy sets out Champion’s commitment to respecting our fiscal obligations and acting as a good corporate citizen regarding our community contributions.



OUR SUPPLY CHAIN

Our business is supported by a diverse supply chain, providing goods, materials and services required at different stages of our value chain. Champion engages regularly and maintains ongoing relationships with its suppliers as trusted partners that are key to its success.

In FY2025, the Company’s operations were supported by 1,254 Tier 1 registered suppliers⁴, including 1,146 suppliers located in Canada representing C\$1,650M of total spend. Of our Tier 1 annual spend, C\$1,527M was contracted to our Canadian suppliers representing 92.5% of our total procurement spendings.

⁴ This data refers to direct or tier 1 suppliers only.

Within Canada, much of our spending is within the province of Québec, including 77.7% of our FY2025 annual spend. 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\$472M was contracted to companies with a local business unit in the Québec Côte-Nord region where the Bloom Lake Mine complex is located (see Figure 3). Moreover, to support Indigenous businesses in our operating area, C\$11.1M was procured from First Nations suppliers.

Only 7.5% of our annual direct expenditures represent our non-Canadian spend. Of this, more than 99% is primarily sourced from suppliers located in Australia, Germany, Italy, Japan, the United States, Singapore and South Africa, with less than 1% of all non-Canadian spend coming from other countries, including Belgium, Brazil, China, France, and the United Kingdom (see Figure 4). The majority of our non-Canadian spend is from Germany, and relates to sea freight services for the transportation of our products to our overseas customers.



Our direct supply chain costs for the reporting period consisted primarily of expenditures supporting our mining operations, and exploration activities. These included transportation, contract labour, mining equipment and processing, spare parts, consumables, and fuel for our onsite operations. Support for our activities not directly linked to mining gave rise to smaller expenditure categories, including support supplies such as staff costs, professional services, and cleaning and security. Although we strive to reduce the risk of causing, contributing to or being directly linked to modern slavery issues, visibility on our supply chain remains limited as information on the origin of raw materials used by our tier 1 suppliers remains partial. At the same time, the vast majority of our tier 1 suppliers are multinationals with policies in place to manage the risks of modern slavery within our procurement.

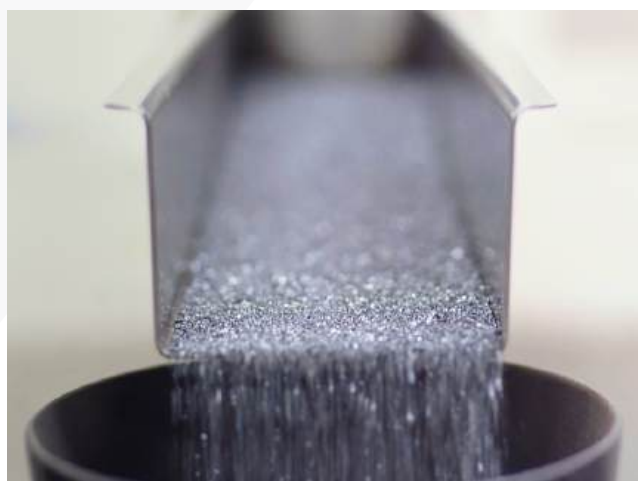


FIGURE 3. CHAMPION'S TOTAL PROCUREMENT IN M\$ (INCLUDING CANADIAN AND NON-CANADIAN)

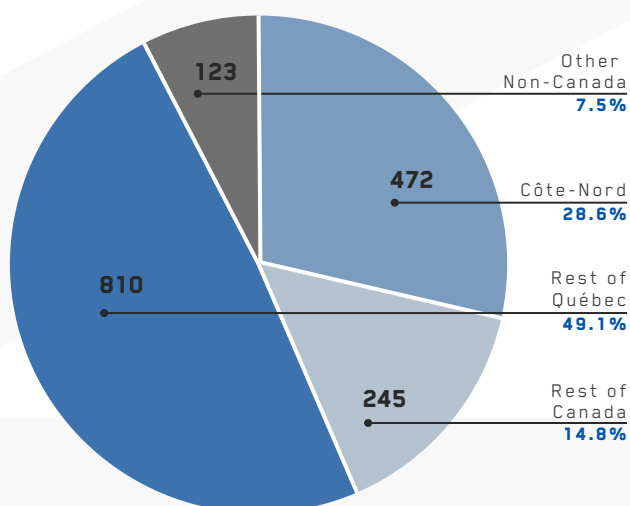
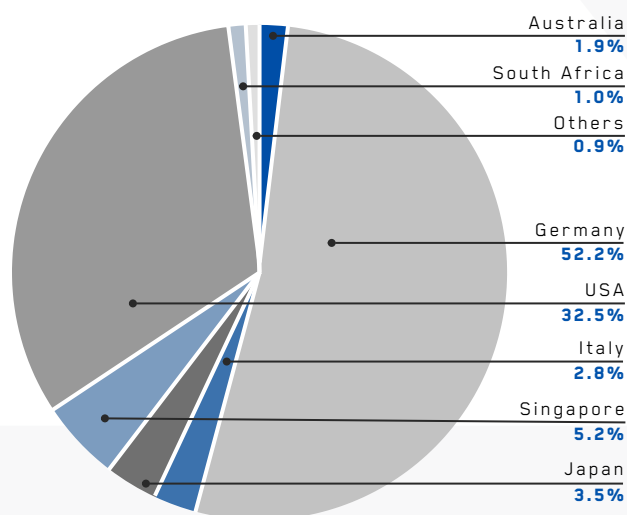


FIGURE 4. CHAMPION'S DIRECT SUPPLIER COUNTRY SOURCES (NON-CANADIAN)



IDENTIFYING OUR MODERN SLAVERY RISKS

IDENTIFYING OUR OPERATIONAL RISKS

Champion is an Australian incorporated entity, with its single operational site and various exploration and development sites located in Canada and its Canadian office located in Montréal. Most of our workforce - employed, contracted and subcontracted - is employed and protected under the employment laws of Canada, Québec, and Newfoundland and Labrador, with which the Company complies. Canada has a comprehensive set of labour laws and regulations designed to protect workers, including the informal sector, which apply to the Company. These laws cover various aspects of employment relevant to modern slavery risks, including wages, working hours, health and safety, and discrimination.

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 relatively very low prevalence of (1.8 per 1,000 people) and vulnerability to, modern slavery, given its strong legal frameworks and enforcement mechanisms to combat modern slavery and human trafficking; it is the lowest-ranked country for modern slavery risk in the Americas.



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 at site are provided with housing, clean water and access to recreational facilities and are not required to remain on site outside of working hours.

All our social investment activities, including our local community investment initiatives guided by our IBA, 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 continue to assess risks related to human rights impacts as needed.

IDENTIFYING OUR SUPPLY CHAIN RISKS

We completed our last assessment of our modern slavery risks in FY2023, and we are committed to updating that assessment whenever we identify a material change to our modern slavery risk profile through our ongoing enterprise risk assessment processes. As part of our routine enterprise risk assessment processes, we review our top 10 risks quarterly and specify mitigation measures to address those risks.

Throughout the year, none of our top 10 identified risks were related to modern slavery or human rights. There has been no material change to our modern slavery risks during the reporting period. As is common in the extractive sector, we reviewed our modern slavery risk assessment which was completed in FY2023 during the reporting year to ensure it reflects to evolution of our business and emerging new risks. This included 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 prioritizing local procurement. Our business review process and supplier screening allow us to mitigate those risks by conducting a review of supplier practices and their exposure to modern slavery risks. Moreover, we conducted research to analyze our downstream exposure to modern slavery. This study was based on geographical criteria and supported by external sources.



Our FY2025 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 from which Champion sources goods and services directly. The review highlighted three potential factors 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, the possibility that there may be weaker governance in some jurisdictions within our value chain.

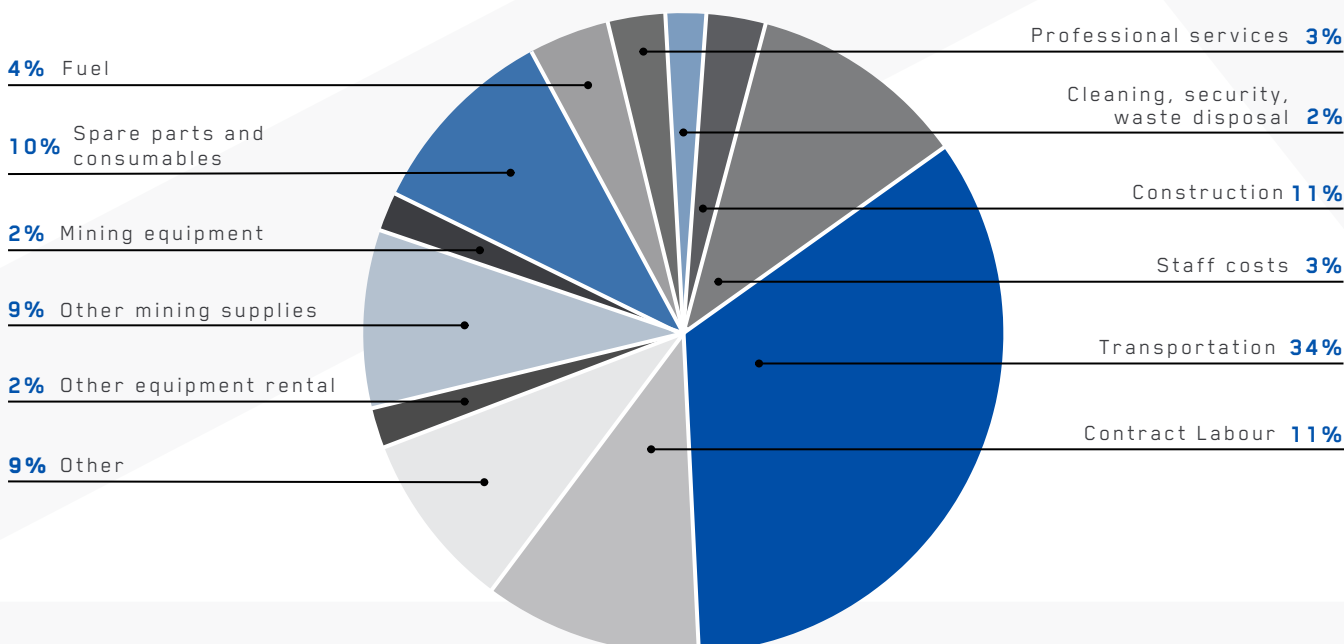
During the reporting period, we conducted periodic analyses of our suppliers to ensure their compliance with modern slavery standards, focusing on identifying partners operating in high-risk countries. Additionally, we actively monitor supplier data and perform screenings of suppliers to investigate any publicly reported instances of forced labour or poor labour practices. This proactive approach reinforces our commitment to ethical supply chain management.

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 7.5% of our total annual purchases during the 2025 financial year for a total of \$123.3M.

Within our international supply chain, 99% of our procurement comes from Tier 1 suppliers in countries with a modern slavery prevalence lower than the prevalence in the United States⁵ which stood at 3.3 per 1,000 people according to the Global Slavery Index. Accordingly, our supply chain is viewed as having relatively low risks of causing, contributing or being directly linked to modern slavery issues when benchmarking with the Global Slavery Index. As stated in [Our Supply Chain](#) section of this Report, visibility on our supply chain remains limited as information on the origin of raw materials used by our Tier 1 suppliers remains partial. At the same time, the vast majority of our Tier 1 suppliers are multinationals with policies in place to manage the risks of modern slavery within our procurement.

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

FY2025



⁵ Across our international supply chain, United States' prevalence is at 3.3 according to the Global Slavery Index.

No modern slavery practices were identified or reported within our operations nor our supply chain during the reporting period. Additionally, we conducted individual preliminary research on suppliers in higher-risk countries to ensure that they offer decent labour conditions and respect human rights. No evidence of modern slavery was identified through the process.

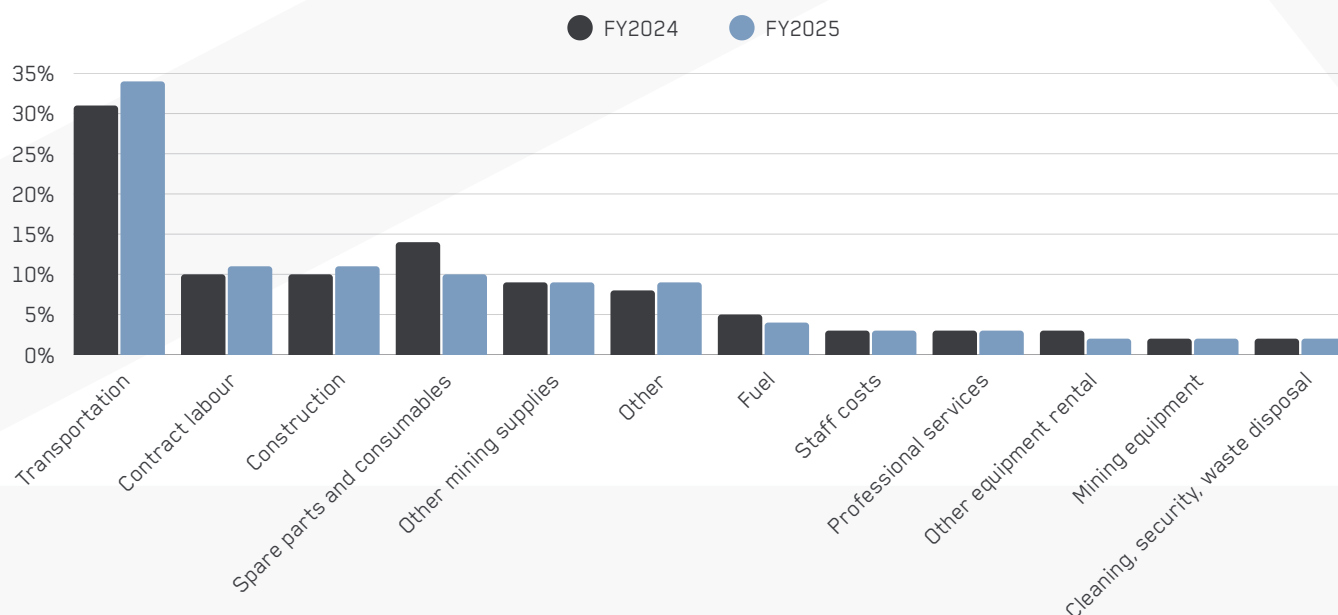
The Mineral Council of Australia, the Australian Council of Superannuation Investors and the Australian Human Rights Commission have respectively listed sector-specific high-risk product and service categories, including cleaning and maintenance, security, food and hospitality, labour hire/contract labour, 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 (see 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, including transportation, construction and contract labour. Although these product and service categories are considered potentially high-risk in the 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.

The Phase II expansion at the Bloom Lake mine and the ongoing DRPF project resulted in volatility in our overall expense mix over recent periods. Accordingly, construction and contract labour expenses declined from FY2022 to FY2024 and slightly increased in FY2025 with the advancement of our DRPF project.

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 in Québec by the Act respecting labour relations, vocational training and workforce management in the construction industry (Québec)⁶. In addition, employees of Champion's largest facilities management subcontractor are also unionized.



FIGURE 6. CHANGE IN PROCUREMENT CATEGORIES BETWEEN REPORTING PERIODS



⁶ Act respecting labour relations, vocational training and workforce management in the construction industry, CQLR c R-20. <https://www.legisquebec.gouv.qc.ca/en/document/cs/R-20>.

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 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.

As it is challenging for regulators to oversee sea freight, the international shipping industry, which is utilized to transport most of our products to overseas customers, 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 well-being of their employees. For example, the employees of the operators 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. The carrier operates under Québec labour laws, including the Charter of Human Rights and Freedoms and the Act Respecting Labour Standards, and is subject to oversight from the Canadian Transportation Agency. Tier 2 suppliers⁷ may present modern slavery risks; however, an analysis has not yet been undertaken regarding such risks. 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; electronics components, technology and hardware⁸; and rubber products.

As part of our dedication to continuous improvement, we continued to update our procurement and vendor management practices, and we plan to continue assessing our suppliers as part of our business review process.

⁷ A Tier 2 supplier is defined as indirect suppliers, which are supplier of our direct suppliers.

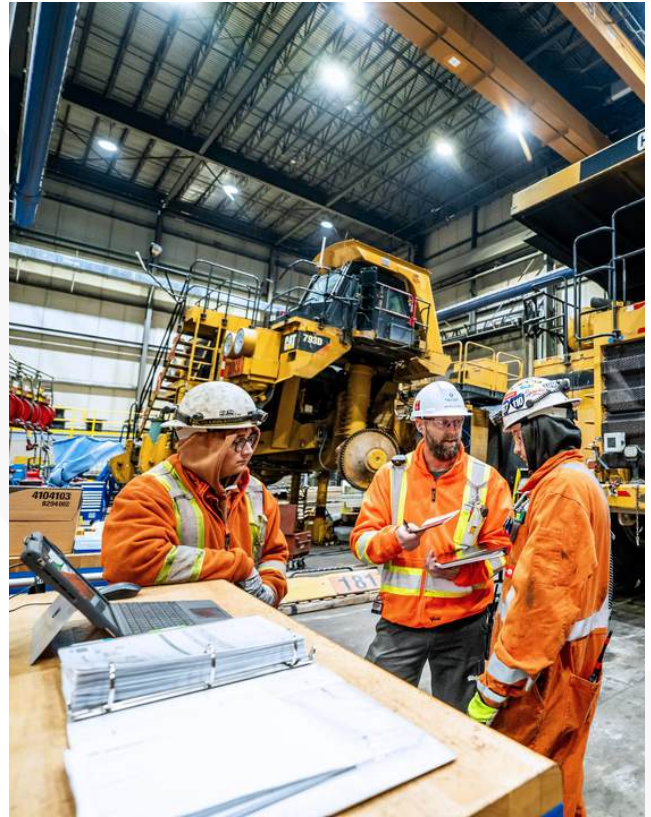
⁸ The 2023 Global Slavery Index considers electronics and garments as the top two products at risk of modern slavery that are imported into the G20.

ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISKS

Respecting human rights is at the heart of Champion's commitment 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 chains.

The Company believes that it has a responsibility to work collaboratively with workers, suppliers, customers, communities, First Nations 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.

In order to better track the implementation of our policies, and as part of our continuous improvement efforts, we continued implementing an updated procurement process during the reporting period by undertaking our business review process in addition to supplier screening assessment to more effectively take into account human rights considerations and modern slavery risks throughout our supply chain. For suppliers operating in regions considered to be higher risk, additional research is conducted to ensure they are not suspected of using forced labour.



We employ the business review process to assess human rights and modern slavery risks. We use an inventory and purchasing dashboard to map out our procurement spending and to identify the level of risk and the strategic nature of our suppliers. The risk level includes considerations related to human rights and modern slavery, in addition to other types of risks. The strategic importance of each supplier is determined by its relationship with Champion. For example, a supplier that is the sole purchasing option is considered highly strategic. The level of risk and strategic importance of each supplier determines the frequency of our business review process, which includes a review of the supplier's exposure to modern slavery and human rights risks. We continued to implement the business review process during the 2025 financial year, and the frequency of review for each supplier varies depending on the nature of the supplier and its contribution to our activities.

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, considerations Champion also places high importance and weighting on quality, support, occupational health and safety history, and on whether suppliers are local and First Nations-owned (Innu Takuaihan Uashat Mak Mani-Utenam).



POLICIES AND PROCEDURES

A suite of policies and procedures help Champion ensure that the Company is consistently addressing modern slavery risks throughout its business, operations and supply chain. Our Board of Directors annually reviews all policies to ensure they reflect the evolution of our business and aligns with industry best practices. Champion's policies and procedures relating to human rights and modern slavery apply to all our subsidiaries and are described below.

CODE OF CONDUCT

The Code outlines our commitment to respect and protect human rights throughout our operations. All employees are required to complete an online training on the Code after being hired. While we do not provide training on forced or child labour, the training on the Code includes content on human rights and discrimination.

All employees are required to recertify their knowledge of the Code, with a mandatory test annually while they continue to work for Champion and its controlled entities. In addition, employees are asked to electronically confirm their commitment to abide by the Code on an annual basis. This process is designed to ensure compliance and a consistent understanding of human rights and related policies by the Company's workforce.

HUMAN RIGHTS POLICY

Rooted in the United Nations Guiding Principles on Business and Human Rights, 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, including forced labour and child labour, 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.

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 provides guidelines fostering sustainable development in the purchasing, leasing and contract award practices of the Company.

The policy includes protections of migrants' rights, ensuring that workers throughout our supply chain, regardless of immigration status, are treated ethically and fairly.

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 avoid being complicit in, or facilitating all forms of human rights violations in our supply chain.

The Responsible Procurement policy is published on Champion's website and Champion requires that all suppliers adhere to the policy. The policy sets out several supplier requirements, including commitments not to engage in any form or practice of modern slavery as described in the Australian Act and the Canadian Act, including child labour, and to comply with the *ILO Forced Labour Convention (No. 29)*. The policy also states that suppliers must not exact work or services from any person under threat of punishment, and must not force individuals to perform any work or services against their will. The policy explicitly prohibits any engagement in human trafficking and protects migrants' employment rights.

WHISTLEBLOWER POLICY

Our 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 the Senior Vice-President, Human Resources, and to the 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.

PREVENTION AND HANDLING OF HARASSMENT AND DISCRIMINATION IN THE WORKPLACE POLICY

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, suppliers and their employees, as well as any stakeholders directly or indirectly in relation with Champion, to report any instances of harassment or discrimination they may witness to the Whistleblower hotline.

During the reporting year, we updated this policy to define sexual harassment, identify designated individuals responsible for handling complaints, and clarify the expected conduct of employees during social events, and to ensure compliance with Bill 42. These changes to our policy are designed to provide a safer workplace for all our workers.



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 allegation is made in good faith. Champion is committed to addressing and remedying human rights violations within its operations.

Our operational community feedback mechanism includes access via the Company's website at www.championiron.com 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.



FLEXIBLE WORK POLICY

With the goal of providing our employees with a work environment that is safe, healthy, productive, and efficient, Champion promotes a policy designed to facilitate remote work. The Flexible Work 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.

With the exception of the Employee Grievance Mechanism and the Flexible Work policy, which have been developed as internal instruments, all our policies can be viewed on our website at www.championiron.com.

BUSINESS REVIEW PROCESS

In FY2025, we improved and updated our supplier business review process in order to screen our new and actual suppliers. This enhanced approach enables us to identify potential human rights and modern slavery vulnerabilities within our supply chain. These vulnerabilities are then incorporated into each supplier's overall risk rating on our centralized dashboard. This process provides enhanced visibility into service quality across our supplier network and facilitates the identification, mitigation and monitoring of various risks, including human rights concerns.

For some of our new suppliers, particularly those that we deemed could potentially become more significant to our operations in the future (either in terms of their financial impact or their strategic importance), we have an established pre-qualification process. This process includes a thorough survey of the supplier's operations, including a site visit, to ensure that we are well acquainted with their operations and better understand their exposure to modern slavery risks.

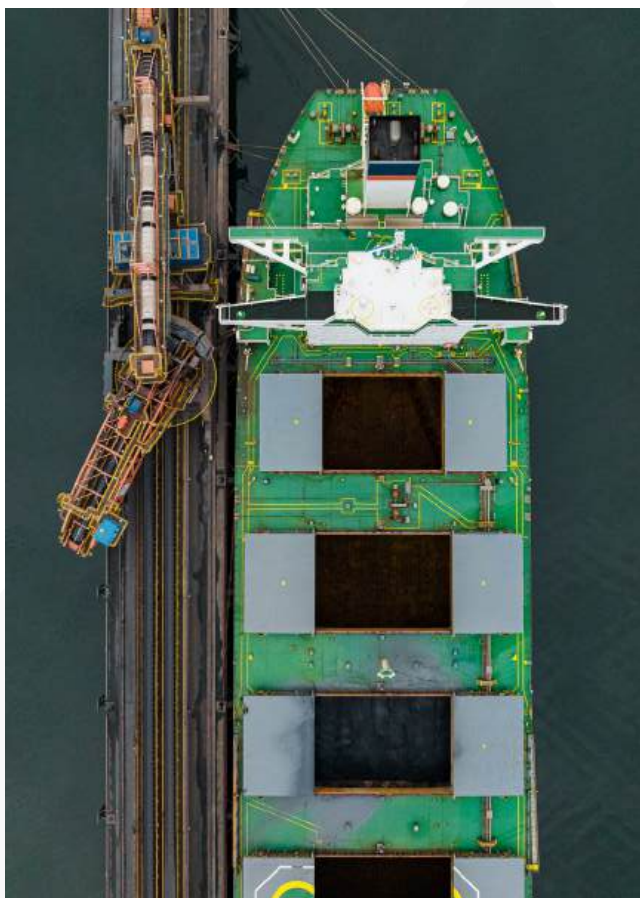
REMEDIATION MEASURES

Champion has assessed that its current operations and supply chain do not carry significant risks of forced or child labour being utilized, nor have any instances of forced or child labour been identified during the reporting period. Additionally, Champion has assessed that its steps to eliminate the use of forced or child labour have likely not caused any losses of income to vulnerable families who may be experiencing forced or child labour. Subsequently, questions regarding remediation are not applicable.

Employees can raise concerns about potential modern slavery risks via one of the grievance or whistleblower channels described above.



ASSESSING OUR EFFECTIVENESS



This is our sixth Australian Modern Slavery Statement, and our second joint report in line with the Canadian modern slavery requirements. 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, business review process, and due diligence, as detailed in the Looking Forward section of this Report.

We update our detailed modern slavery risk assessments when we identify a material change to our modern slavery risks profile through ongoing enterprise risk assessment processes. We intend to continually monitor publicly available sources, including the Global Slavery Index, to ensure our risk assessment and modern slavery processes remain up to date. We will ensure that our practices meet any evolving regulatory requirements in both Australia and Canada, including any amendments to the Australian Act and the Canadian Act.

CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Champion developed this Statement in consultation with its operating subsidiary, QIO, 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 Champion, QIO and its other subsidiaries. The senior leadership team of Champion also reviewed this Statement. The signatory of this Statement, Mr. David Cataford, is the Chief Executive Officer and Director of Champion, and he approved this Statement on behalf of all reporting entities.



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. As part of our commitment to continuous improvement, we will continue to advance the commitments identified in our previous reports. These commitments seek to further identify, assess, address, and remedy our modern slavery and human rights risks, including:

SUPPLIER ENGAGEMENT

- Continue to monitor and annually review our Responsible Procurement Policy;
- 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 Tier 1 suppliers.

DUE DILIGENCE

- Continue to conduct annual reviews of our modern slavery risk assessment;
- Continue to improve our supplier due diligence and internal audit processes to better identify, prevent, and mitigate modern slavery risks; and
- Conduct a study to understand our downstream exposure to modern slavery.



OTHER INFORMATION

CAUTIONARY NOTE REGARDING FORWARD-LOOKING STATEMENTS

This Statement includes certain information and statements that may constitute “forward-looking information” under applicable securities laws. 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. Inherent in forward-looking statements are risks, uncertainties and other factors beyond the Company’s ability to predict or control.

SPECIFIC FORWARD-LOOKING STATEMENTS

All statements other than statements of historical facts included in this Statement that address future events, developments or performance that Champion expects to occur are forward-looking statements. These include, among other things, expectations regarding (i) the DRPF project, expected project timeline, production metrics and benefits, including contribution to the industry’s transition to low emission steelmaking; (ii) the Kami Project, including its potential to produce a DR grade product, expected project economics, projected life of mine, production metrics and engagement with strategic partners, including the partnership among Champion, Nippon and Sojitz; (iii) the Company’s sustainability objectives, social matters and governance, implementation of related initiatives commitments and expected results and benefits thereof; (iv) creating stakeholder value; (v) the risk of causing, contributing to or being directly linked to instances of modern slavery; (vi) 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) and results thereof; (vii) advancing commitments identified in our 2024 Modern Slavery Statement and in this Statement and other commitments related to modern slavery and human rights risks and achieving related objectives and results; and (viii) the Company’s growth and opportunities generally.

RISKS

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 2025 Annual Information Form and the MD&A for the financial year ended March 31, 2025, 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.

ADDITIONAL UPDATES

All of the forward-looking information contained in this Statement 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.

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