

# Modern Slavery Statement FY24

1 December 2024



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## 1. Introduction

At St Barbara Limited (St Barbara, We, Us), we are committed to upholding high standards of integrity and ethical conduct in all our operations. We recognise our responsibility to ensure that our business practices in Australia, Canada and Papua New Guinea (PNG), do not contribute directly or indirectly to modern slavery, child labour or human trafficking in any form. We understand that responsibility extends beyond the well being of our direct employees to our supply chain, the prosperity of the communities we touch and the environments we operate in. We believe that, together with our stakeholders, we can make a meaningful difference and set an example for ethical and responsible business practices in the mining industry.

St Barbara Limited's Modern Slavery Statement outlines our approach to evaluate and address our modern slavery and child labour risks. As a result, St Barbara's FY25 commitments continue to focus on making meaningful change in our Papua New Guinea operation and supply chain.

This Modern Slavery Statement (Statement) is made pursuant to the *Modern Slavery Act 2018* (Cth) (Australia) and the *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023* (Canada) (collectively, **Modern Slavery Acts**) by St Barbara Limited, for the financial year ended 30 June 2024 (FY24).

This document should be read in conjunction with our other periodic and continuous disclosure announcements lodged with the ASX, including our FY24 Annual Report and FY24 Corporate Governance Statement, which are available at <https://stbarbara.com.au/>.

In accordance with the requirements of the Modern Slavery Acts, I attest that the St Barbara board of directors has reviewed the information contained in this report. Based on their knowledge, and having exercised reasonable due diligence, they have attested that the information in the report is true, accurate and complete in all material respects for the purposes of the Modern Slavery Acts, for the reporting year ending 30 June 2024.

Andrew Strelein  
Managing Director & Chief Executive Officer



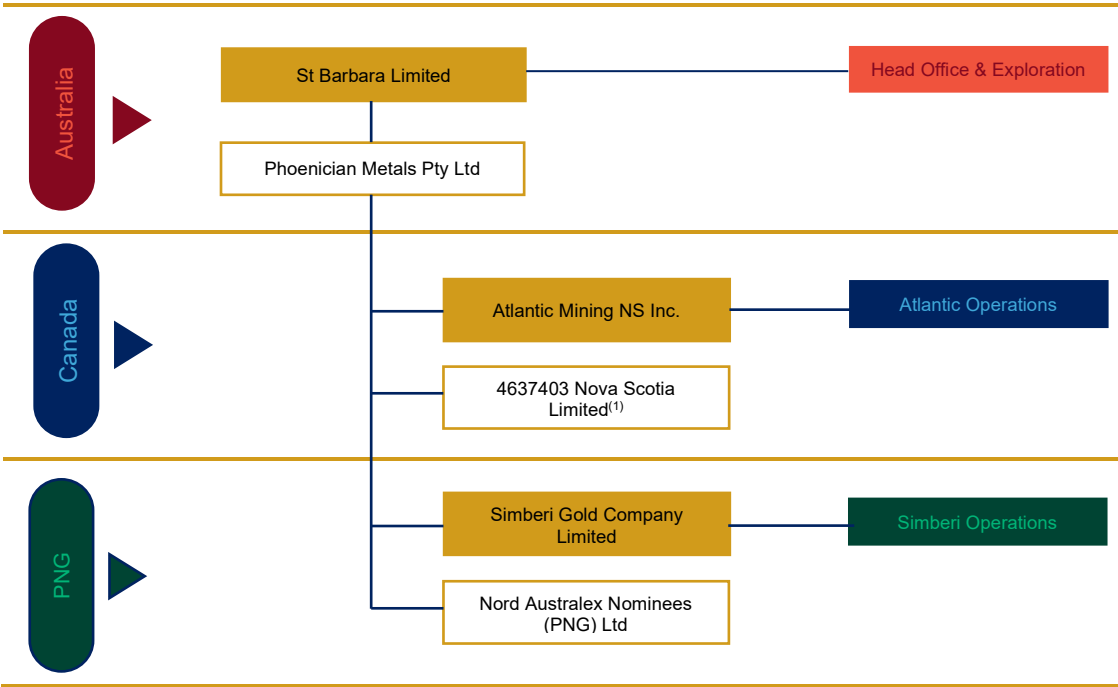
## 2. About St Barbara

### 2.1. Reporting Entity and Structure

This statement is made on behalf of St Barbara Limited and its subsidiaries including Atlantic Mining NS Inc (incorporated in Nova Scotia, Canada, company number 4433421), and Simberi Gold Company Limited (incorporated in the PNG, company number 1-26598).

St Barbara is listed on the Australian Stock Exchange and is a mining company engaged in the exploration, development, mining, and sale of gold with operations and projects in Australia, Canada and Papua New Guinea.

An overview of our corporate structure is provided below:



<sup>(1)</sup> Company incorporated under the Companies Act, Nova Scotia, Canada on 2 August 2024.

#### Key

Non-Operating Entity
Operating Entity



## 2.2. Operations

Our operations encompass the exploration, development, mining, processing and delivery of gold doré for refining as well as the closure and rehabilitation of our mine sites.



During the reporting period, the following activities were conducted:

### Papua New Guinea (Simberi operations)

Activities associated with open cut gold mining and processing were conducted on Simberi Island, New Ireland Province. Studies were also undertaken in relation to a prospective mine expansion and future transition from oxides to sulphides mining.

1567 people are engaged in the Simberi operations at any one time, with approximately 786 employed directly by St Barbara and another 781 employed indirectly either as labour hire or through service contractors.

Our PNG operations are overseen by our Executive General Manager – Simberi who reports directly to the Chief Executive Officer of St Barbara.

### Canada (Atlantic operations)

Activities associated with mining and processing gold were conducted at Touquoy, Nova Scotia until the site was placed into care and maintenance in November 2023. Until that time, between 200 and 320 personnel were employed within our Canadian operations.

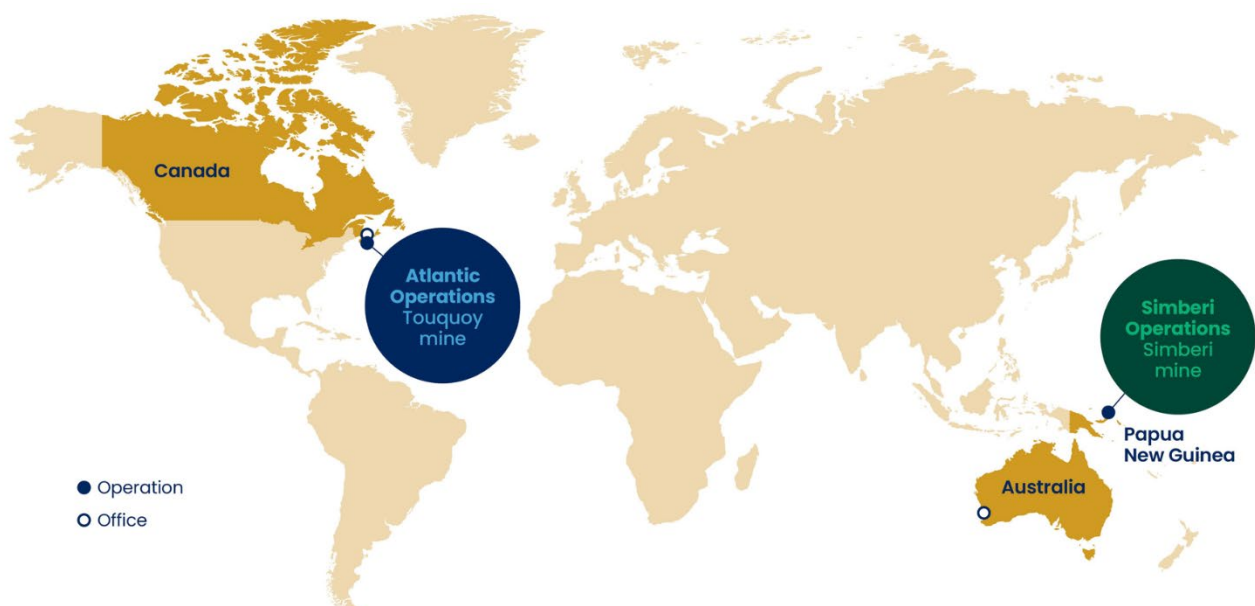
After operations ceased at Touquoy, activities have involved exploring in various areas of Nova Scotia, rehabilitation and environmental monitoring of Touquoy and permitting and project development activities in relation to 15 Mile, Beaver Dam and Cochrane Hill.

Atlantic now employs 45 personnel in Canada across various roles including permitting, rehabilitation, tenement management, exploration, financial management, human resources, community relations and site operations and management. Our Canadian operations are overseen by our Vice President – Atlantic Operations who reports directly to the Chief Executive Officer of St Barbara.

### Australia (Head office and exploration)

Our corporate head office is located in Perth, Western Australia where our Chief Executive Officer and Managing Director is based.

At the end of FY23 the Leonora operation in Western Australia was sold to Genesis Minerals. Since this time, Australian activities have been limited to exploration activities in Pinjin, Western Australia and Back Creek, New South Wales.





### 2.2.1. Sustainability

Environmental, social and corporate governance are central to our business. St Barbara measures and reports on environmental, social, and economic performance in the Annual Report, governs the business via approved charters, policies and standards, and the code of conduct.

## 3. Supply Chain

The mine operational supply chain encompassed goods and services broadly from the following categories:

- Labour hire and other contracted services;
- Heavy machinery fleet, including parts and tyres;
- Engineering and construction services;
- Reagents and Fuel;
- Transportation and logistics, including shipping; and
- Processing equipment including prefabricated equipment.

The supply chain in respect of exploration, mine development, permitting and reclamation encompasses professional services including engineering and technical services (hydrologist, geochemistry, geophysical, drilling, electricians, mechanics, construction/civil contractors).

St Barbara endeavors to buy locally in the country of operation, mitigating supply chain risk to business continuity and providing economic support to the countries and communities in which we operate.

Previously, a centralised group procurement function was responsible for providing support to the business to fulfill operational requirements. The function managed supply chain risk sought new opportunities and provided effective governance of procurement processes. However, from July 2023, the procurement function was decentralised with purchasing occurring within the Atlantic and Simberi operations rather than from head office. This has allowed for closer relationships, accountability, and transparency with suppliers.

St Barbara engages suppliers around the globe. The majority of suppliers are domiciled in Australia, PNG and Canada, reflecting the utilisation of local suppliers at wherever possible.

It is recognised that a number of suppliers supply goods that are either grown or manufactured in locations other than where those suppliers are domiciled. St Barbara's focus has remained on first-tier suppliers to build maturity with this group before progressing to the more complex challenge of understanding second tier suppliers.

## 4. Modern Slavery Risks at St Barbara

In consultation with management and key internal stakeholders, we have assessed modern slavery risks to identify and evaluate the potential risks of modern slavery and child labour in the operations and supply chains.

Recognising the shared responsibility, we collaborate with industry partners, Non-Government Organisations, and governmental bodies in Australia, Canada, and Papua New Guinea to tackle the challenges associated with modern slavery and child labour.

Consistent with the UN Guiding Principles on Business and Human Rights, the risk of modern slavery practices is assessed in our operations and supply chain by determining whether we have caused, contributed to, or are directly linked to modern slavery. In response, modern slavery and child labour risk have been categorised as being either "Direct" (caused by St Barbara) and "Supply Chain" (directly contributed to by St Barbara) modern slavery risks.

### 4.1. Direct Modern Slavery Risk

According to the Global Slavery Index, forced labour predominantly occurs in high-risk industries such as agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services. The mining industry is not listed directly, and whilst we utilise construction, cleaning and hospitality services, they generally are supplied on our premises therefore providing transparency and the contractual requirement to adhere to our policies and procedures.

However, we consider that there is a much higher risk of modern slavery in our Simberi operations. A summary of the risks within our operations is summarized below:

#### 4.1.1. Canada and Australia

Due to the highly skilled nature of our workforce in Australia and Canada, the low jurisdiction risk of modern slavery and child labour in Australia and Canada (Australia and Canada are ranked 149 and 144 out of 160 countries for modern slavery prevalence by the 2024 Global Slavery Index), and our transparent recruitment and remuneration programs, we consider that there is a low risk of direct modern slavery and child labour practices in our Australian and Canadian (Atlantic) operations.



#### 4.1.2. Papua New Guinea

We consider that there is a higher risk of modern slavery and child labour in our Papua New Guinea operations because:

- Papua New Guinea has a much higher incidence of modern slavery owing to the levels of social inequality, poverty, and inadequate laws to prevent practices resulting in modern slavery (Papua New Guinea is ranked 20<sup>th</sup> for modern slavery prevalence by the Global Slavery Index); and
- approximately 66% of our Papua New Guinean workforce is engaged in unskilled or low skilled work which is more readily susceptible to modern slavery and child labour. The remaining 34% of our workforce in Papua New Guinea is highly skilled with strong competition for their services in the resources industry. These workers are typically well paid in comparison to other workers.

However, labour conditions in Papua New Guinea are often regulated by local customary systems - such as tribal and clan type organisations of mutual aid and reciprocity - making modern slavery (versus simple poverty) less likely amongst unskilled and low skilled workers.

##### **Risk amongst workers engaged directly by St Barbara**

We are able to eliminate the risk of modern slavery where workers are engaged directly by St Barbara (or subsidiaries) rather than through labour hire providers and service providers. Directly engaged workers make up 50% of the Simberi workforce. Appropriate processes and frameworks are in place to ensure that all workers (and particularly unskilled workers):

- are paid in accordance with our remuneration framework, and not less than the national minimum wage set by the Minimum Wages Board of Papua New Guinea (currently 3.5 PGK per hour). Our lowest annualised salary in FY24 was K13,305 per annum plus superannuation for entry level positions;
- work appropriate hours with rostered time off, meal breaks, and access to annual leave and sick leave;
- have appropriate living conditions when on our site including shared or single room accommodation, three meals per day, drinking water and other staff amenities. Workers are also provided with appropriate clothing and personal protective equipment; and
- are adults and not child workers. However, verifying the age of locals on Simberi Island remains challenging as birth certificates are rarely held by candidates from local communities. National ID Cards (NID) are challenging for locals to obtain, and the majority of locals do not have driver's licenses as they do not have vehicles. The NID application process is long and requires the applicant to leave their island. Some locals have provided us with their "Clinic Book" which is the book that mothers are given when children are born on the island.

Despite these measures, there is still a risk that workers are not paid an appropriate "living wage", particularly where workers are local to Simberi Island given the isolated location. Living costs, including food costs, can often increase in the locality of mines, often because the local area can no longer support the increased population, or local farmers have become mine workers. There is some evidence this is the case at Simberi. A survey conducted for the 2019 Social Impact Study provided evidence that the population is reliant on imported foodstuffs. The importing companies are largely controlled by immigrants. Foodstuffs are typically sold at a premium compared to other parts of PNG due to the isolation of the Island and the scarcity of capital and networks for local business to set-up in competition with immigrants.

However, the risk of worker's not being paid a "living wage" is mitigated through the annual salary review process which accounts for market dynamics and other impacts. 603 PNG nationals received a pay increase of 4% in line with inflation in FY24.

We are proud of the role we have played and continue to play in improving the living standards of the residents on Simberi Island and that of workers from other provinces of PNG. In FY24 we partnered with the local Simberi community to:

- continue to support the creation and continued sustainable operation of local Simberi Fishing and Cocoa cooperatives,
- install fish aggregating devices to support local sustainable fishing activities,
- expand the Simberi Women in Marine Activities (SWIMA) program to include the production of fruits and vegetables on Simberi Island; and
- provided micro-loans, technical support and business development training to encourage local entrepreneurship.

Through increasing food security, health and safety, education and economic prosperity of the people of Simberi Island we are decreasing the susceptibility of modern slavery as well as poverty.

##### **Risk amongst workers engaged through labour hire agencies**

There is an increased risk of exploitation and modern slavery amongst workers engaged through labour hire companies, which account for approximately 12% of our workforce.

Although we have knowledge of the rates paid to labour hire agencies, we do not always have visibility of the rate then paid to the relevant workers. Many labour hire contracts stipulate that the rate paid to the relevant labour hire agency is the relevant worker's cost plus a designated percentage. However, there are few means of verifying that the workers are paid the base cost communicated by the labour hire agency. Moreover, we cannot verify whether labour hire agencies charge employees certain costs associated with their employment such as travel, tooling, personal protective equipment or "recruitment fees".



## **Risk amongst workers engaged through recruitment agencies**

Some of the workers engaged directly by us are recruited with the assistance of third-party recruitment firms and agencies.

There is a risk that some of these agencies may engage in practices which constitute modern slavery. For example, some agencies may charge workers a “recruitment fee” upon selection for a role or require certain costs to be reimbursed such as tooling, clothing and travel expenses. These costs may be required to be paid by the workers under a loan agreement subject to exorbitant rates of interest.

Workers from locations with typically lower salaries than those offered by us may be more susceptible. Recruitment agencies may also often use the services of another “local” agency to recruit workers and may not be aware of the arrangements made between that agency and the relevant worker.

This is a new risk that has been highlighted in FY24 and will be a further focus for efforts to eradicate modern slavery in FY25.

## **4.2. Indirect (Supply Chain) Modern Slavery Risk**

St Barbara has previously undertaken a review of its first-tier suppliers to determine the goods and services with a higher supply chain risk. In FY24 it was decided due to St Barbara’s size, resources and risk profile that focus would remain on first tier suppliers in particular, Simberi landowner organisations.

### **4.2.1. How Risk is Assessed**

The risk associated with first tier suppliers was determined by reference to:

#### ***Location***

Workers are more susceptible to modern slavery in countries where laws are inadequate or inadequately enforced to prevent the practice, or where people are more exposed to poverty, discrimination, inequality and war and conflict.

Supplies to St Barbara’s Canadian and Australian operations are considered to be lower risk. Both Australian and Canadian suppliers operate in strong regulatory environments and are subject to employment law that set minimum working standards and pay. The Australian Government has had the second strongest response globally to modern slavery according to the Global Slavery Index. Whilst the Canadian Government’s response doesn’t rank as high, it does have the 17<sup>th</sup> lowest slavery prevalence in the world.

Suppliers to St Barbara’s Papua New Guinea operations are at higher risk of modern slavery. According to the 2023 Global Slavery Index, an estimated 10.3 in every thousand people were in modern slavery in Papua New Guinea at any point in 2021. In other words, an estimated 93,000 people experienced forced labour or forced marriage in Papua New Guinea in 2021. In terms of prevalence of modern slavery, Papua New Guinea ranks 20th globally and 5th within Asia and the Pacific. In FY24, 22% of St Barbara’s global supply was from Papua New Guinea. The percentage of total supply increased in FY24 as a result of selling the Leonora Assets in FY23 and Atlantic Operation going into care and maintenance in FY24.

#### ***Worker Profile***

The types of workers involved in the supply of goods and services can indicate modern slavery risk. Industries involving unskilled or low skilled workers, where the work is considered dangerous or demeaning, or where the work is performed at a remote or unsupervised location are at higher risk of modern slavery.

Workers providing professional and highly skilled services are at much lower risk. For this reasons, engineering services and technical services, and services requiring a formal qualification or minimum level of experience are considered to be less susceptible to modern slavery practices.

Our Papua New Guinea operations utilise a range of security, cleaning and property maintenance services from local Simberi landowner organisations. These types of services are supplied by unskilled or low skilled workers and so are more vulnerable to modern slavery and child labour and have remained the focus of our risk reduction activities.

#### ***Supplier Profile***

An individual supplier’s commitment to reducing modern slavery is indicative of modern slavery risk. Suppliers with governance frameworks and training in place to prevent modern slavery are at much lower risk.

During our risk assessment activities, we have identified that local landowner organisations providing services to our Papua New Guinea operations have limited management and administrative systems to prevent modern slavery. We have requested these local landowner organisations to complete questionnaires manually to help us assess their modern slavery risk. These questionnaires indicate there is a governance risk within these organisations that could lead to an increased modern slavery risk. 6 out of 24 landowner organisations failed to complete the questionnaire as requested, indicating a higher risk of modern slavery than the other landowner organisations.





#### **4.2.2. Identification of High-Risk Suppliers**

As a result of the risk assessment activities described above, St Barbara has identified that the highest indirect supply chain risk is

- within suppliers providing contracted services and labour hire to St Barbara's Simberi operations of an unskilled or low skilled nature; and;
- Simberi landowner groups.

For this reason, in FY25, St Barbara will focus its efforts on reducing modern slavery risk to these groups of suppliers.

Amongst goods supplied to us, electronic goods and rubber tires are considered to be more susceptible to modern slavery at lower levels of the supply chain given the commodities and parts incorporated into the finished goods. However, we have not focused on mitigating the risk of modern slavery associated with these goods given our size and influence in the supply chain, and much higher risk of modern slavery amongst our direct service suppliers.

## **5. Actions to Address Modern Slavery Risk**

We have conducted a number of activities to address the risk of forced labour and child labour in our supply chain, although we believe that the risk is low given the scope of goods and services that we acquire and the nature of our business activities.

Our efforts have concentrated on implementing actions within our Simberi operations given the higher assessed supply chain risk.

### **5.1. Operational Actions to address direct Modern Slavery Risk to date**

#### **5.1.1. Living Conditions**

- Established cleaning and maintenance protocols for the camp to ensure operating standards.
- Conducted food handling and hygiene training for employees working in the camp kitchen.
- Provided medical health care including preventative health checks to all employees.
- Contributed to the provision of infrastructure to Simberi Island including but not limited to, medical health care, roads, airport, wharf, education, law & order, water and sanitation.

#### **5.1.2. Child Labour**

Recruitment Process includes:

- Applicants providing their age on employment forms.
- Visual verification of employees and contractors age where age verifying documentation is not available.
- Training and awareness programs provided to staff to recognise and prevent potential issues related to modern slavery.
- Additionally, Simberi engaged with the PNG Resources Industry Human Resources Network at the Korn Ferry Conference to share learnings with industry peers and determine whether any new methods were being used to support age verification.

#### **5.1.3. Wages**

- Remuneration Framework that guides how roles are salary assessed and grouped into salary banding.
- Annual salary reviews to ensure pay equity amongst employees and to account for market & impacts.
- Twice monthly review of Simberi payroll by the Australian corporate Human Resources and Finance functions.
- Participation in the Korn Ferry Salary Survey, which provides salary benchmarking data to ensure fair, transparent, and current remuneration based on experience and qualifications for a role.
- A Workplace Consultative Committee established that is made up of employees. The committee raise employment related concerns, provide feedback on employment matters and provide employee and engagement improvement opportunities to Simberi Management
- Assessment of the effectiveness of the annual review process of salary/wages against minimum wage as well as fortnightly pay run approval process to ensure subject matter experts review an adequate segregation of duties.

Annual Commitments listed in Section 8 indicates that in FY25 we will review recruitment agencies used to recruit workers engaged directly by us to ensure ethical recruitment practices.

### **5.2. Supply Chain Actions to address indirect Modern Slavery Risk to date**

#### **5.2.1. Supplier Onboarding Screening**

New Suppliers are required to complete a due diligence survey before onboarding. The questionnaire also helps us understand if the suppliers adhere to our Code of Conduct and if the suppliers have their own modern slavery and human rights policy.

It is our policy not to engage with third parties where the minimum national and/or international legally required labour standards are not adhered to or where we believe, following a modern slavery risk assessment, that the third party or its suppliers engage in modern slavery (Minimum Standards).

We will not enter into or renew any contract with a third party whose risk of modern slavery is assessed as high without evidence that the third party has in place adequate controls to manage the risk of modern slavery.



### 5.2.2. Supplier Minimum Requirements

Suppliers are required to have a governance framework in place meeting our minimum requirements, including the following:

- Health and safety
- Environment
- Anti-bribery and anti-corruption
- Modern slavery

### 5.2.3. Audits and Site Visits

We conduct audits of our suppliers, contractors, and business partners to ensure their compliance with our standards. Audits and site visits completed of selected suppliers have not indicated a risk of exploitation.

We are confident that the schedules and rates negotiated with our suppliers are reasonable and commercial and do not place the suppliers' workforce at risk of exploitation by their employer.

Annual Commitments as listed in Section 8 indicate in FY25 we will audit one landowner supplier to understand their level of compliance to their own policy requirements.

### 5.2.4. Contract Terms and Conditions

We have included provisions in our supply contracts requiring minimum standards regarding health & safety, environment, anti-bribery and anti-corruption and forced labour and child labour.

Annual Commitments as listed in Section 8 indicate in FY25 we will establish due diligence checklist and policy expectations for suppliers of unskilled labour, particularly local landowner organisations.

### 5.2.5. Rate Reviews

Supplier rates are reviewed at tender for reasonableness to mitigate the risk of workers being paid poorly.

### 5.2.6. Employee Training

St Barbara has developed and implemented a modern slavery training module for staff within its Simberi operations who manage contracted service suppliers.

### 5.2.7. Policies and Procedures

We have ensured that forced labour and child labour risk is addressed in our governance framework in alignment with our values. To that end, we have adopted and implemented the following policies and supporting procedures established across the corporate group:

- Modern Slavery Policy;
- Modern Slavery Procedure;
- Community and External Relations Policy;
- Code of Conduct;
- Supplier Code of Conduct;
- Procurement Policy; and
- Human Resource & Recruitment guidelines.

### 5.2.8. Reporting

A whistleblowing hotline is available for our workers (including workers employed by our suppliers and service providers) to report incidents of modern slavery and worker exploitation.

## 6. Assessing Effectiveness

We assess the effectiveness of our actions by:

### 6.1. Simberi Landowner questionnaires

Monitoring and reviewing Simberi landowner questionnaires assist understanding the extent that our land owner suppliers recognises modern slavery and the activities to focus on in partnering with the suppliers to help them address the risk of modern slavery within their organisation. As the understanding of modern slavery increases within the landowner suppliers and their processes mature, we will shift focus to compliance and audits.

From our FY24 questionnaire supplied to 24 local landowner's suppliers, we found that:

- 23 questionnaires were completed (21% increased participation on FY23).
- No instances of employees under 18 years of age were reported.



- 82% of participants pay the, or above the minimum wage of K3.50 an hour.
- 1 participant is paying K0.30 an hour below the minimum wage.
- 5 participants did not know the PNG minimum wage amount and 4 participants did not respond to the question.
- 2 participants indicated they have a Modern Slavery Policy.
- 7.4% (7.6% in FY23) of employees were women.
- No incidents were reported of people under the age of 18 were employed.
- 47% (44% in FY23) indicated they have a recruitment policy or indicated they use St Barbara's policy in lieu of their own.
- 61% (78% in FY23) either had a safety policy or indicated they use St Barbara's policy in lieu of their own.
- 56% (50% in FY23) had a code of conduct or indicated they use St Barbara's policy in lieu of their own.
- All had a working day of 12hrs or less (customary in mining rosters).

## 6.2. Monitoring reports of modern slavery through formal and informal processes

Whilst we have an anonymous whistleblower hotline to report incidents of modern slavery, no incidents were reported in the reporting period.

Whilst this is a good result, this may also be an indication that workers are uncomfortable reporting any incidences of exploitation.

## 6.3. Obtaining feedback from our employees, suppliers and their workers.

A Simberi focused Workplace Consultative Committee raises employment related concerns, provides feedback on employment matters and provides employee and engagement improvement opportunities to Simberi Management.

## 6.4. Assessing the effectiveness of wage reviews and payment accuracy

The annual review process of salary/wages against minimum wage as well as fortnightly pay run approval process to ensure subject matter experts review an adequate segregation of duties.

# 7. Consultation with Subsidiary Companies

The St Barbara Modern Slavery Statement is a joint statement on behalf of itself and all of its wholly owned subsidiaries (the reporting entity) after a process of consultation. The Simberi leadership team, procurement and community relations team were engaged on matters specific to the Simberi operation. Consultation was undertaken with the group executive leadership team including key areas of the business (human resources, legal, and procurement).

# 8. Commitments

St Barbara is committed to continually developing and improving the effectiveness of the actions we are taking to assess and address modern slavery risks. The evaluation of effectiveness is vital to ensuring that we are on the right track and effecting meaningful change.

### 8.1.1. FY24 Commitments Progress

FY24 Commitments	Measure	Progress Status
1. >90% of Simberi landowner suppliers complete modern slavery questionnaires.	Number of Surveys completed	96% of Simberi landowners completed
2. Work with landowner suppliers on governance, in particular assist with the development of the following templated policies for their adoption: <ul style="list-style-type: none"> <li>– Recruitment policy</li> <li>– Safety Policy</li> <li>– Code of conduct</li> <li>– Safety controls</li> </ul>	Landowner governance toolkits developed and contractually mandated where landowners do not have policies in place.	<ul style="list-style-type: none"> <li>• Implementation Plan developed.</li> <li>• Implementation activities to commence in November 2024.</li> <li>• Commitment will be carried over to FY25 commitments.</li> </ul>
3. Provide information and/or training to all landowner suppliers on modern slavery (including minimum wage).	Training module and/or information developed and distributed.	<ul style="list-style-type: none"> <li>• Implementation Plan developed.</li> <li>• Implementation activities to commence in November 2024.</li> <li>• Commitment will be carried over to FY25 commitments.</li> </ul>



FY24 Commitments	Measure	Progress Status
4. Review due diligence survey methodology to increase effectiveness in the eradication of modern slavery.	Increased insightfulness from survey results informing tangible commitments in the following financial year.	<ul style="list-style-type: none"> <li>• 21% increase in participation to FY23.</li> <li>• Increased quality and completeness of responses from participants.</li> <li>• Commitment will be carried over to FY25 to insure focus on highest risk areas.</li> </ul>

### 8.1.2. FY25 Commitments

FY25 Commitments	Measure
1. Work with landowner suppliers on governance, in particular assist with the development of the following templated policies for their adoption: <ul style="list-style-type: none"> <li>– Recruitment policy</li> <li>– Safety Policy</li> <li>– Code of conduct</li> <li>– Safety controls</li> <li>– Modern Slavery Policy</li> </ul>	Landowner governance toolkits developed and contractually mandated where landowners do not have policies in place.
2. Provide information and/or training to all landowner suppliers on modern slavery (including minimum wage).	Training module and/or information developed and distributed.
3. Review due diligence survey methodology to increase effectiveness in the eradication of modern slavery.	Increased insightfulness from survey results informing tangible commitments in the following financial year.
4. Review agencies used to recruit workers engaged directly by us to ensure ethical recruitment practices and they are prohibited from presenting candidates without their knowledge, accepting any payments from candidates, providing or facilitating any loans to candidates, charging candidates any other costs that must be reimbursed without such costs being disclosed to us, and unlawfully discriminating against candidates	Establish protocol for vetting recruitment agencies including relevant questionnaire.
5. Audit at least 1 x landowner supplier to ensure compliance with their own policies and procedures and other procedures to prevent modern slavery.	Fulsome audit of 1 x landowner supplier to identification of required corrective actions
6. Establish due diligence checklist and policy expectations for suppliers of unskilled labour, particularly local landowner organisations.	Establishment of due diligence checklist and template policies.

## 9. Conclusion

Modern slavery is a global challenge that requires collective effort. At St Barbara, we are strongly committed to playing our part in eradicating and removing such practices from our operations and supply chain wherever they might exist. We will be focused on making commitments that create real change in our highest areas of risk. We urge our stakeholders to join us in this endeavour.

## Our values

We act with honesty and integrity

We treat people with respect

We value working together

We deliver to promise

We strive to do better

