

MODERN SLAVERY STATEMENT

2024



OCEANAGOLD



Water truck at Haile Gold Mine, USA

Acknowledgement


OceanaGold acknowledges the Indigenous Peoples in all jurisdictions that host our operations and offices. We demonstrate our respect for Indigenous Peoples through our actions and commitments to responsible business practices.

Front cover: Sunrise at Didipio Mine, Philippines

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Tussock art work at Macraes, New Zealand



About this Statement

Modern slavery is any form of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, deception and/or abuse of power. It comes in many forms, such as forced labour, debt bondage, forced marriage, slavery and human trafficking. The International Labour Organization estimates that approximately 50 million people are subject to modern slavery on any given day¹.

50million

Approximately 50 million people are subject to modern slavery on any given day

Core sample



REPORTING ENTITIES

This is a statement (**Statement**) prepared by OceanaGold Corporation (BC0786321 and ABRN 124 980 187) (**OceanaGold Corporation**) in accordance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (**Canadian Act**) and Australia’s *Modern Slavery Act 2018* (Cth) (**Australian Act**). Pursuant to the Australian Act, the Statement is a joint statement covering both OceanaGold Corporation and Oceana Gold Pty Ltd (ABN 56 107 488 200) (OGPL and, together with OceanaGold Corporation, the **Reporting Entities**).

This Statement is prepared for the financial year ended December 31, 2024. In this Statement, unless otherwise stated, all references to “OceanaGold”, “Group”, “we”, “us” and “our” refer to OceanaGold and our subsidiaries. Monetary amounts in this Statement are expressed in U.S. dollars (USD), unless otherwise stated.

CONSULTATION

The drafting of this Statement was led by the Business Integrity team with input from representatives in our operations and centre offices, across Commercial, Finance, Procurement, Legal, Business Integrity, External Affairs and Social Performance (**EASP**) and Health,

¹ Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, September 2022.



Martha Pit at Waihi, New Zealand

Safety and Environment. The Executive Leadership Team (**ELT**) of OceanaGold and Asset Presidents (**APs**) of each operation also reviewed this Statement. The ELT comprises the President and Chief Executive Officer and Executive Vice Presidents (**EVPs**) who are responsible for the management of the Group, including the Reporting Entities. Some ELT members and APs are also Directors of our Reporting Entities and their operating subsidiaries, which allows for continued engagement in the preparation of this Statement. Accordingly, the ELT and APs have facilitated consultation in respect of this Statement between the Reporting Entities and across our controlled entities.

APPROVAL AND ATTESTATION

This Statement was reviewed and approved by the ELT and each AP of OceanaGold. It was further approved by the Board of Directors of OceanaGold Corporation on 3 May 2025 on behalf of the Reporting Entities in accordance with the Canadian Act and the Australian Act.

In my capacity as a Director of OceanaGold Corporation, and in accordance with the requirements of the Canadian Act (and in particular Section 11(4)(a) thereof) I attest that I have reviewed the information contained in this Statement for the entity listed above. Based on my knowledge, and

having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting period listed above.

Gerard Bond
Director and President
and Chief Executive Officer
OceanaGold Corporation

Mandatory Criteria



Process plant welder

SECTION	CANADIAN LEGISLATION	AUSTRALIAN LEGISLATION
A Message from our Chief Executive		Mandatory Criteria 7: Any other information that the reporting entity considers relevant.
About this Statement	11(5) The approval of the report must be evidenced by (a) a statement that sets out whether it was approved pursuant to paragraph (4)(a) or subparagraph (4)(b) (i) or (ii); and (b) the signature of one or more members of the governing body of each entity that approved the report.	Mandatory Criteria 1: Identify the reporting entity. Mandatory Criteria 6: Describe the process of consultation with any entities that the reporting entity owns or controls.
Our Structure and Operations	11(3) The report must also include the following information in respect of each entity subject to the report:	Mandatory Criteria 2: Describe the structure, operations and supply chain of the reporting entity.
Our Supply Chain	(a) its structure, activities and supply chains;	
Our Modern Slavery Risks	11(3) The report must also include the following information in respect of each entity subject to the report: (c) the parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.	Mandatory Criteria 3: Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls.
Actions Taken to Assess and Address Modern Slavery Risks	11(1) Every entity must, on or before May 31 of each year, report to the Minister on the steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity. 11(3) The report must also include the following information in respect of each entity subject to the report: (b) its policies and its due diligence processes in relation to forced labour and child labour; (d) any measures taken to remediate any forced labour or child labour; (e) any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains; (f) the training provided to employees on forced labour and child labour.	Mandatory Criteria 4: Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.
Assessing Effectiveness	11(3) The report must also include the following information in respect of each entity subject to the report: (g) how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.	Mandatory Criteria 5: Describe how the reporting entity assesses the effectiveness of such actions.

A Message from our Chief Executive Officer

At OceanaGold, we are committed to treating everyone connected to our business – our employees, communities and suppliers – with Care, Respect and Integrity. These fundamental values are part of the Company’s Values and as such are integral to how we operate and guide our approach to responsible mining and ethical business practices.

Our Human Rights Policy reflects this commitment, consistent with its recognition of international standards such as the *United Nations Universal Declaration of Human Rights*, *United Nations Guiding Principles on Business and Human Rights (UNGPs)* and *International Labour Organization*. Modern slavery is a complex and pressing global challenge requiring our vigilance, collaboration and dedication to continuous improvement in our approach.

In our Modern Slavery Statement, prepared in line with the Canadian Act and the Australian Act, we outline the measures we have implemented in 2024 to enhance our understanding, management and mitigation of modern slavery risks across our operations and supply chain.

I am pleased to share that we have successfully met all of our 2024 commitments, including that we:

- Scoped our supplier due diligence process to support suppliers in our community development program;
- Developed an approach to refresh our supplier risk attributes;
- Reviewed our Sponsorship and Donations Standard to identify and manage potential modern slavery risk;

- Completed a review of our suppliers identified as having a high inherent risk;
- Prepared to deliver human rights awareness training to the Board of Directors (delivered in February 2025); and
- Implemented a new Code of Conduct hotline provider and case management system to improve experience for people who raise concerns and enhance reporting and case management capability.

In addition, we have further:

- Developed a multi-year strategic roadmap to strengthen our business controls in assessing and addressing modern slavery risks over time; and
- Updated Human Rights Impact Assessments (HRIAs) and accompanying action plans across all our operating sites.

These accomplishments not only strengthen our foundational practices, but also provide clarity regarding our focus areas and goals moving forward.

Looking ahead to 2025, we are furthering our commitment to addressing modern slavery risks with plans to:

- Commence the refresh of existing high-risk suppliers through the use of due diligence questionnaires;
- Implement changes to our supplier due diligence process to commence screening of suppliers in our community development programs;
- Build a reporting dashboard for the Steering Committee to oversee the supplier due diligence process; and
- Review our Grievance Management Standard and define formal escalation pathways for human rights grievances.

Addressing modern slavery requires collaboration and collective action. At OceanaGold we will continue to engage with our business partners and stakeholders to drive meaningful progress in this important area. We remain committed to transparency, ongoing improvement and sharing our challenges and achievements.



“We remain committed to transparency, ongoing improvement and sharing our challenges and achievements. As always, we invite your feedback.”

Gerard Bond
President and Chief Executive Officer
OceanaGold Corporation

Our Structure and Operations

OUR STRUCTURE

OceanaGold Corporation is the parent company of the Group. OceanaGold Corporation is incorporated under the *Business Corporations Act* (British Columbia) and listed on the Toronto Stock Exchange (TSX: OGC) and traded on the OTCQX Best Market in the U.S. (OTCQX: OCANF). Our ownership structure consists of the following entities which directly hold our assets:

- Haile Gold Mine Inc. – incorporated in Delaware, United States and holds our wholly owned Haile Gold Mine;
- OceanaGold (Philippines) Inc. (**OGPI**) – incorporated in the Philippines and holds the right to operate the Didipio Mine. We own 80% of OGPI¹; and
- Oceana Gold (New Zealand) Limited – incorporated in New Zealand and holds our wholly owned Macraes Operation and Waihi Operation.

Processing plant at Macraes, New Zealand



There are a number of other entities in the Group, including OGPI and certain other management companies, holding companies and subsidiaries. Our latest [Annual Information Form](#) dated March 31, 2025 provides a full breakdown of our material subsidiaries and certain subsidiaries that we consider significant.

OUR OPERATIONS

Our operations include each of the Haile Gold Mine, Didipio Mine, Macraes Operation and Waihi Operation. Our activities include exploration, development and the mining and processing of gold, copper and silver. We own and operate open pit and underground mines, the ore from which is processed at our on-site processing plants to produce gold doré bars. The Didipio Mine also produces a copper concentrate.



Our activities include exploration, development and the mining and processing of gold, copper and silver.

1 On May 13, 2024, OGPI completed the initial public offering of 20% of the issued and outstanding common shares in the capital of OGPI on The Philippine Stock Exchange, Inc.

Our site operations are supported by dedicated Geology, Health and Safety, Environment, People and Culture, Legal, External Affairs and Social Performance, Information Technology, Mining, Processing, Asset Management and Commercial teams. Our head office is based in Vancouver, Canada and supported by offices in Brisbane and Melbourne, Australia; Dunedin, New Zealand; Makati, Philippines; and Singapore, which provide strategic, systems, governance and execution support for our operations and their support functions.

OUR OTHER PROJECTS

We have four operating mines and a number of organic growth projects, including each of the Palomino Underground at our Haile Gold Mine and Waihi North Project, which includes the proposed Wharekirauponga underground mine, as well as early-stage exploration targets at each of our operations.

 [Annual Information Form](#)



Water treatment plant at Waihi, New Zealand

Our Structure and Operations continued

OceanaGold is a multinational gold, silver and copper producer with four producing mines. Our headquarters are in Vancouver (Canada), and we have support offices in Brisbane and Melbourne (Australia), Manila (Philippines), Singapore and Dunedin (New Zealand).



● DIDIPIO MINE
Location: Luzon Island, Philippines

Profile: Underground operation producing gold and silver as doré bars and gold/copper in concentrate

2024 production: 97koz Gold, 149koz Silver and 12kt Copper

Employees and Contractors as at December 31, 2024:
Employees: 822
Contractors: 1,249

● MACRAES OPERATION
Location: South Island, New Zealand

Profile: Open pit and underground operation producing gold as doré bars

2024 production: 125koz Gold and 4koz Silver

Employees and Contractors as at December 31, 2024:
Employees: 672
Contractors: 133



● WAIHI OPERATION
Location: North Island, New Zealand

Profile: Underground operation producing gold and silver as doré bars

2024 production: 53koz Gold and 193koz Silver

Employees and Contractors as at December 31, 2024:
Employees: 427
Contractors: 144

● HAILE GOLD MINE
Location: South Carolina, USA

Profile: Open pit and underground operation producing gold and silver as doré bars

2024 production: 212koz Gold and 131koz Silver

Employees and Contractors as at December 31, 2024:
Employees: 769
Contractors: 271

Our Supply Chain

OUR SUPPLY CHAIN ROADMAP

The diagram (right) outlines the principal elements of the mining life cycle in relation to our supply chain.

REFINERIES

In 2024, gold doré produced from the Macraes Operation was transported to The Perth Mint Australia (**The Perth Mint**), Perth, Western Australia, while the gold doré produced from Waihi was transported to ABC Refinery in New South Wales, Australia. Didipio doré was directed to both ABC Refinery and The Bangko Sentral Ng Pilipinas (**BSP**) Refinery in the Philippines. Doré produced in the U.S. was transported to Metalor Technologies USA Corporation (**Metalor**), Boston, Massachusetts, U.S. The gold doré bars we produce contain both gold and silver.

All gold doré was refined and cast into London Bullion Market Association Good Delivery Standard bars and marked with the refiner stamp. The gold is then sold to financial institutions and/or the refineries. During the reporting period, we transitioned our commercial offtake agreement for copper concentrate from Trafigura Group Pte. Ltd. (**Trafigura**) to Transamine Trading S.A. (**Transamine Trading**), which took effect on April 1, 2024.

The Perth Mint, ABC Refinery, Metalor, Trafigura and Transamine Trading are all committed to responsible sourcing. Their policies, setting out their socially responsible practices, are available on their websites.

Sunrise at Haile Gold Mine, USA



OUR VALUE CHAIN



INPUTS
Materials, Goods and Services



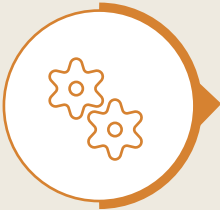
EXPLORATION
Drilling Services
Consulting Services



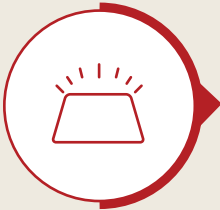
DEVELOPMENT
Construction and Engineering Services and Construction Materials



MINING
Mining Equipment Fuel and Lubricants



PROCESSING
Grinding Media (Steel), Reagents and Chemicals, Electric Power



OUTPUTS
Gold, Silver and Copper



TRANSPORT TO CUSTOMERS
Air, Ocean and Road



REHABILITATION
Consulting Services
Diversified Support Services



END USE
Gold Bars, Coins, Industrial Uses and Jewelry



REFINERY/SMELTER



RELINQUISHMENT

Our Supply Chain continued

OUR SUPPLIERS

The procurement of goods and services at OceanaGold is executed by a combination of operationally based Commercial teams and a centralized Group Procurement team who provide guidance and support for operational procurement and manage global procurement initiatives, with support from Legal professionals. Governance of procurement, specifically procurement policies and procedures such as the Group Procurement Standard, is also centrally managed.

In 2024, we engaged 3,408 Tier 1 suppliers¹, which included:

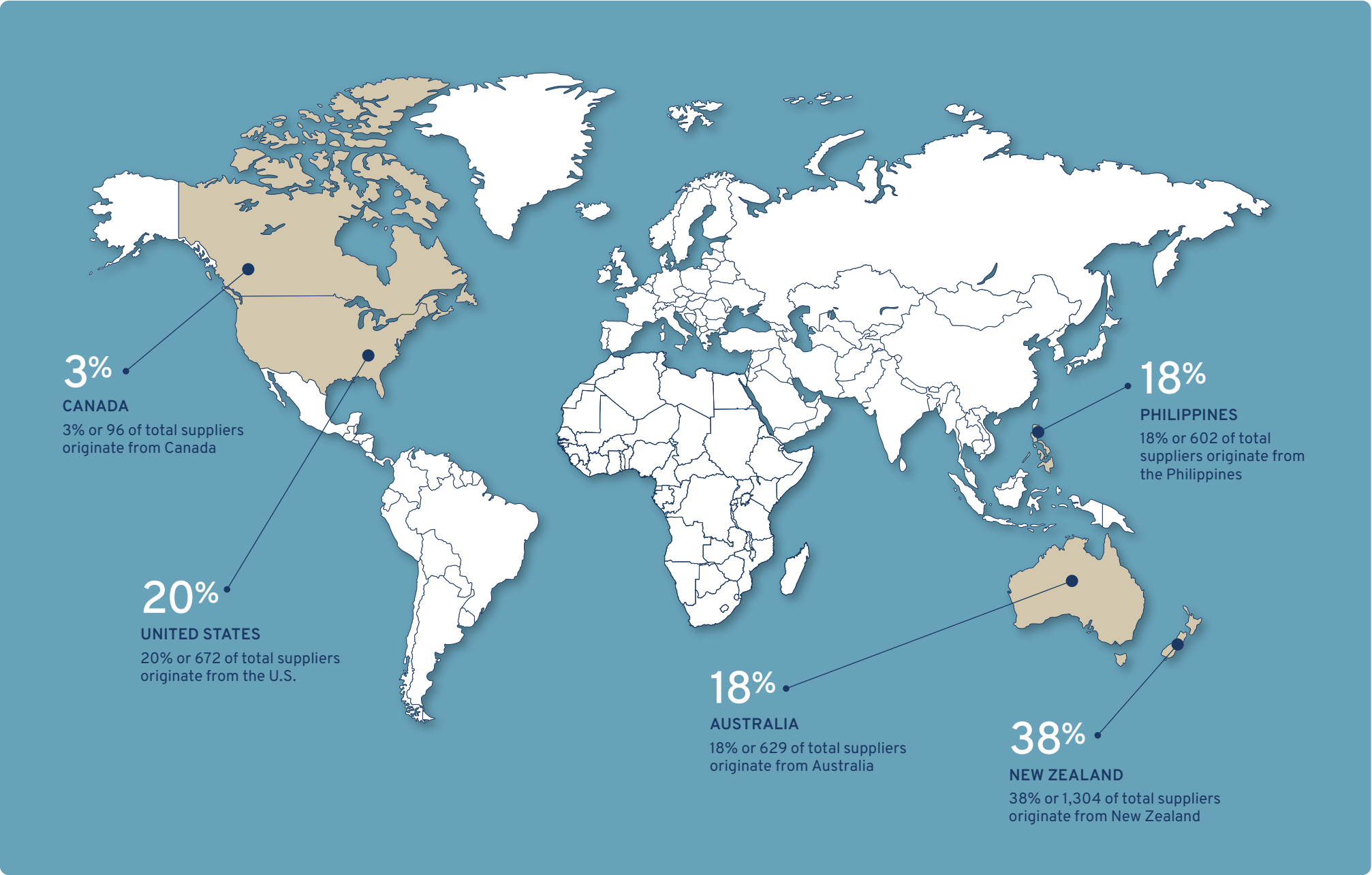
 **48**
Suppliers from 48 different industries;

 **49%**
49% of spend across four industries; and

 **29**
Suppliers from 29 different countries.

TIER 1 SUPPLIERS BY LOCATION

The map (right) provides a high-level view of where our suppliers are based. These countries are shaded gold; and for illustrative purposes, the top five countries with the highest volume of suppliers have been named on this map.



¹ Tier 1 suppliers relate to our direct suppliers we do business with. Tier 2 suppliers relate to the suppliers who our Tier 1 suppliers source from.

Our Supply Chain continued

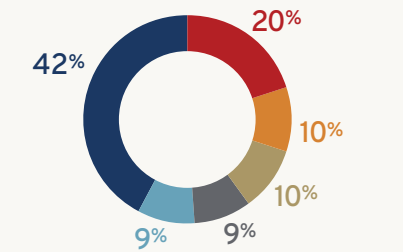
TIER 1 SUPPLIERS BY INDUSTRY

Our risk methodology relies on the Global Industry Classification Standard (GICS) to improve the consistency and comparability of risk analysis across suppliers. The composition of our statistics may vary compared to prior years as we previously used GICS Sub-Industry classification.



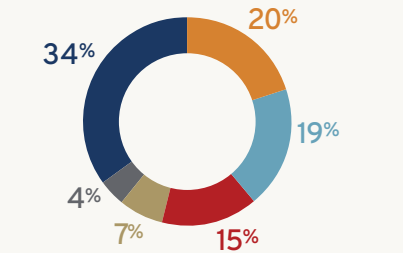
“Our risk methodology relies on the Global Industry Classification Standard to improve the consistency and comparability of risk analysis across suppliers.”

LARGEST INDUSTRIES BY SUPPLIER SPEND



Machinery	20%
Professional Services	10%
Construction and Engineering	10%
Financial Services	9%
Commercial Services and Supplies	9%
Other	42%

LARGEST INDUSTRIES BY NUMBER OF SUPPLIERS



Professional Services	20%
Commercial Services and Supplies	19%
Machinery	15%
Construction and Engineering	7%
Electrical Equipment	4%
Other	34%



Water treatment plant at Didipio, Philippines

Our Modern Slavery Risks

RISKS IN OUR OPERATIONS

We recognize that the nature of our business and the jurisdictions in which we conduct our business has an associated risk that our operations could cause, contribute to, or be directly linked to, modern slavery. Potential modern slavery risk exposures in our operations are considered in site level Human Rights Impact Assessments (HRIAs), which were updated in 2024 at each of our operations, as described in the [Actions Taken to Assess and Address Modern Slavery Risks](#) section.

The modern slavery risks of our operations include:

- Workforce – a risk of “causing” or “contributing to” modern slavery if any of our employees, contractors or temporary workforce were in exploitative situations. We understand this risk is heightened when our workforce is in countries with higher modern slavery risks, in particular the Philippines.
- Community – a risk of “contributing” or being “directly linked” to modern slavery if our activity contributes to modern slavery in the community.
- Investments – a risk of being “directly linked” to modern slavery through our investments if our investees are themselves involved in modern slavery.

Across 2023 and 2024, each of our operations completed updates to their HRIAs, guided by the [OceanaGold Human Rights Policy](#) and the [UNGPs](#). The HRIAs considered the fundamental human rights of our employees and contractors, individuals in host communities, workers in our local supply chain and other rights-holders. There were no modern slavery risks identified in any of the updates to operations’ HRIAs. Furthermore, there were no changes in the standards we adhere to or the nature of our operations (including supply chain) which impact the findings of our HRIAs.

In addition to the HRIAs, we remain in conformance with the requirements of the *World Gold Council’s (WGC) Responsible Gold Mining Principles (RGMPs)*. Our most recent [RGMP Implementation and Conformance Report](#) and [Conflict Free Gold Statement \(CFGS\)](#), including findings from the independent assessments which confirm our ongoing conformance of the WGC’s RGMPs and CFGS, are available on our website. Conformance with the RGMPs requires that our underlying systems and processes have been implemented and applied at our operations to deliver ethical conduct, understanding of our impacts, and appropriate supply chain and human rights performance.

RISKS IN OUR SUPPLY CHAIN

We consider our most significant risk of potential exposure to modern slavery practices to be indirect links through our supplier relationships.

In late 2023, we developed and piloted a supplier due diligence process, which included our own risk methodology and supporting technology for assessing suppliers that meet the specified scope for modern slavery as well as other ethical risks, such as bribery and corruption, conflicts of interest and economic sanctions. This process was formally introduced in the first quarter of 2024.

In addition, due to the differences in how risks can manifest for suppliers in the delivery of our community development programs, design of this process was prioritized separately and completed in 2024. Please refer to the [Due diligence processes section](#) for additional information

The overall risk ratings for the 3,408 suppliers are:

- 20 High Risk
- 485 Medium Risk
- 2,903 Low Risk

The 20 suppliers identified as High Risk were subject to additional due diligence measures to understand and assess potential impact to operations. Through this process, no material issues were identified.

TIER 1 SUPPLIER GEOGRAPHIC RISKS

As part of our assessment, we reviewed [WalkFree’s Global Slavery Index](#) and identified those suppliers operating in those countries with an estimated prevalence of modern slavery greater than 3.5 per 1,000 population. We identified suppliers operating in eight of these countries:

- Philippines (602 suppliers)
- China (17 suppliers)
- Malaysia (4 suppliers)
- Indonesia (3 suppliers)
- India (2 suppliers)
- South Korea (1 supplier)
- Vietnam (1 supplier)
- Brazil (1 supplier)



TIER 1 SUPPLIER INDUSTRY RISKS

We have utilized information from *WalkFree*, *International Organization for Migration* and *Transparency International*, to identify industries that are high risk for modern slavery and obtained a review from a leading human rights consultancy firm to validate this assessment. We identified suppliers operating in 13 high risk industries:

- Commercial Services and Supplies (657 suppliers)
- Construction and Engineering (234 suppliers)
- Electrical Equipment (139 suppliers)
- Metals and Mining (112 suppliers)
- Construction Materials (68 suppliers)
- Electronic Equipment, Instruments and Components (44 suppliers)
- Oil, Gas and Consumable Fuels (33 suppliers)
- Textiles, Apparel and Luxury Goods (28 suppliers)
- Building Products (24 suppliers)
- Technology Hardware, Storage and Peripherals (24 suppliers)
- Food Products (21 suppliers)
- Health Care Equipment and Supplies (20 suppliers)
- Paper and Forest Products (8 suppliers)

Actions Taken to Assess and Address Modern Slavery Risks

STRATEGIC ROADMAP

In 2024, we developed a three-year strategic roadmap on how we intend to continue to strengthen our business controls, and assess and address our modern slavery risks, over time. We started by conducting an evaluation of our existing business controls to understand our current operating state. We then formulated a view on what our future state should look like for each business control by considering:

- What we wanted to improve;
- Existing programs of work in place;

- Actions our peers were taking;
- Changes to legislation and emerging risks; and
- Advice from specialist consultants.

We then identified the required activities against each area (e.g. corporate governance, due diligence, training) that would be completed across 2025, 2026 and 2027, enabling us to reach our desired future state by 2028. This plan was endorsed by our Executive Vice President, General Counsel and Company Secretary and Chief Sustainability Officer.

CORPORATE GOVERNANCE

Our holistic approach to responsible mining is guided by our: Purpose; Vision and Values; our Code of Conduct; and policies and standards, with oversight from the ELT and the Sustainability Committee which reports to our Board of Directors.

Our Responsible Mining Framework below defines how we operate across our business to manage potential economic, health and safety, employment, environmental and

social impacts and risks, while leveraging the potential to enhance positive outcomes for all our stakeholders, including third parties.

Our policy requirements also help to drive performance towards external criteria, including the *WGC's RGMPs and CFGS*.



Mine rescue equipment

RESPONSIBLE MINING FRAMEWORK



Actions Taken to Assess and Address Modern Slavery Risks continued

EASP Management System

Our EASP Management System helps identify and analyze how we: impact the communities where we operate; align our operational performance with local aspirations; create opportunities and value for stakeholders; and respect cultural heritage, norms and practices. As part of our EASP Management System, our Human Rights Policy and associated standard commit us to respecting the human rights of everyone impacted by our business and throughout our value chain, in line with the *UNGPs*, *UN Declaration of Human Rights (UDHR)* and other international frameworks. The policy and associated standards include requirements for:

- Identifying and mitigating human rights risks, including through Human Rights Impact Assessments (**HRIAs**);
- Establishing a grievance mechanism, including remedy for adverse impacts;
- Human rights training; and
- Consulting and communicating our human rights impacts.

Our approach to human rights helps us enhance our understanding of modern slavery risk across our value chain. The following infographic sets out our human rights governance structure.

In 2024, we reviewed and updated our Human Rights Policy to update our commitment to the protection of human rights and strengthen alignment with evolving external standards and expectations. This was approved by our Board of Directors in 2024.

Supplier Code of Conduct

As part of our ongoing commitment to work safely, ethically and responsibly, in 2024 we embedded a mandatory acknowledgement of our Supplier Code of Conduct in English and Tagalog¹ for all suppliers that undergo the due diligence process. The Supplier Code of Conduct provides high-level guidance on topics such as human rights, communities and Indigenous Peoples. It reflects our shared commitment to responsible business practices and outlines the standards we expect all our Tier 1 suppliers to understand and adhere to.

Other Governance

Other key policy and performance standards that support our overall approach to managing modern slavery risks include our:

- Code of Conduct, which is a practical guide for everyone at OceanaGold, including our Directors, employees, contractors and anyone acting on our behalf. It helps us live our Values and guides our decision making.
- Group Procurement Standard which provides requirements in relation to procurement processes. These requirements include supplier confirmation of their strong commitment to health and safety and compliance with applicable laws.
- Fair Employment Policy sets out our commitment to provide fair employment and workplace conditions, including compliance with all applicable workplace and employment laws as a minimum. It also prohibits the use of forced, compulsory or child labour.

1 Tagalog is the national language of the Philippines.

HUMAN RIGHTS GOVERNANCE



OVERSIGHT/ACCOUNTABILITY

- Board of Directors approves policies
- Board Sustainability Committee tracks performance
- CEO oversees implementation
- EVP Chief Sustainability Officer accountable
- Group Manager assures implementation
- Managers and Sites implement



POLICIES/PROCEDURES

- Human Rights Policy sets commitments and goals
- Human Rights Standard sets performance requirements for each level of the Company
- EA & SP Manual drives planning, performance, monitoring and review



MONITORING/REVIEW

- Due Diligence assessing suppliers for modern slavery risk
- HRIA review of site operations for human rights risk exposure with Group oversight



TRAINING/AWARENESS

- Human Rights Training specific to users that can influence human rights issues
- Operational Grievance Mechanisms identify, assess and remedy human rights issues

Actions Taken to Assess and Address Modern Slavery Risks continued

- Anti-Corruption Policy and Anti-Bribery and Anti-Corruption Standard prohibits bribery, corruption and fraud in any form. It provides guidance to our subsidiaries, Directors, employees, contractors, consultants, agents and anyone representing or acting on behalf of OceanaGold on preventing, detecting and addressing corrupt practices.
- Whistleblower Policy is intended to encourage individuals to report concerns about potential misconduct without fear of retaliation. It also explains how we handle these reports and includes country-specific Information Sheets that reflect local requirements.

COMMITTEES AND WORKING GROUPS

Our Responsible Supply Chain Management approach is governed by two groups – the Responsible Supply Chain Working Group (RSCWG) and the Responsible Supply Chain Steering Committee (RSCSC).

The RSCWG is a committee led by our Business Integrity function and supported by key representatives from Sustainability, Commercial, Group Procurement, Legal, Digital Technology and site operations, as required. The RSCWG focuses on identifying and resolving key operational issues to achieve key strategic projects. The RSCWG meets bi-monthly or as required.

The purpose of the RSCSC is to provide guidance and oversight of the Responsible Supply Chain program of work. It further facilitates strategy development, decision making, advocacy, risk management, improved planning and also endorses this report for CEO and Board approval. The RSCSC is comprised of senior Legal, Sustainability and Digital Technology members and meets on a quarterly basis or as required.



“Training helps to raise awareness and integrate consideration for respecting human rights across our business.”

Commitments for 2025:

- Build a reporting dashboard for the Steering Committee to oversee the supplier due diligence process. The reporting will cover process metrics such as approval status, risk level, high risk indicators, turn-around time and data quality issues.

INDUSTRY ENGAGEMENT

In 2018, we joined the United Nations Global Compact, and continue to participate annually in the *Global Compact Network Australia's Modern Slavery Community of Practice and Business*. In 2025 we will participate in the *Human Rights Accelerator Program* global initiative which enables us to engage in open forums and conferences to share experience and learn from our peers. We continue to actively engage in these sessions to identify new opportunities and approaches to apply to our human rights due diligence.

HUMAN RIGHTS TRAINING

Training helps to raise awareness and integrate consideration for respecting human rights across our business. Our employees are key to identifying and managing the risks of modern slavery and our training is designed to equip our employees with the knowledge, tools and skills to understand what human rights and modern slavery are and what to do if identified.

In 2021, we rolled out human rights training to leaders and external facing employees across People and Culture, Commercial, Legal, Health and Safety and External Affairs and Social Performance functions who are in positions where an understanding and awareness of human rights is important. The training is mandated

and re-issued every two years to refresh awareness on human rights and modern slavery. As at December 31, 2024, 501 (89%) out of the 560 required employees were up to date with this training. In addition to this, 100% of the ELT also completed the training.

In December 2024, we designed and delivered modern slavery specific training to Legal, Procurement and other employees involved in the supplier due diligence process. These training sessions have resulted in a greater level of awareness and risk maturity across the organisation.

In February 2025, we delivered human rights awareness training to our Board of Directors. The training was facilitated by an external human rights consultant and covered a range of important topics, including human rights due diligence, evolving human rights and business context, and the importance of Board oversight and engagement on human rights.

OPERATIONAL RISK ASSESSMENT

We recognize risk management is an integral part of operating our business and an effective risk management framework can protect business value, reduce the potential impacts of hazards to the business and external communities, secure a safer work environment and growth opportunities and promote a risk-aware culture. Risk management is considered by all our business units in their day-to-day activities. Each operation owns and manages the operational risks applicable to them. Risk management is the responsibility of all employees, contractors and consultants, who are each expected to understand and manage the risks within their areas of accountability. Additional information on our Risk Management Policy is available on our website.

We use Human Rights Impact Assessments (**HRIAs**) as the due diligence tool to identify how our activities could potentially cause harm or contribute to a breach of human rights, including modern slavery. The process begins by assessing our performance against the full set of internationally recognized human rights benchmarks, to determine the most salient human rights risks on site for our employees, contractors, supply chain workers, communities and other key stakeholders.

The HRIAs consider human rights, as outlined in and informed by the *UNGPs* and *UDHR*. The HRIAs include a saliency mapping of human rights risks and opportunities related to OceanaGold's operations and business relationships, as well as a gap analysis of our current management of these risks and opportunities against UNGPs and the *Voluntary Principles on Security and Human Rights*.

The HRIAs are conducted by independent consultants. The HRIA methodology includes desktop reviews of documentation, interviews and focus groups with rights-holders and stakeholders which may include our vendors, employees, management, contractors, external community groups, government agencies and civil society. Once a HRIA is complete, the respective teams review and prioritize identified recommendations and actions which are tracked on a quarterly basis.

In 2024, HRIAs were updated across each of our operating sites with no material issues identified.

Actions Taken to Assess and Address Modern Slavery Risks continued

DUE DILIGENCE PROCESSES

Our supplier due diligence process for new suppliers starts by issuing a due diligence questionnaire via our due diligence technology platform to the supplier to collect information against these risk factors, which is validated before producing an overall risk rating which is either Low, Medium or High.

RISK FACTOR	DEFINITION	RISK CONSIDERED
Country of Operations	Where the supplier operates, distributes or manufactures their products or services.	Bribery, corruption and modern slavery risks associated with the country.
Industry	What industry the supplier operates in.	Bribery, corruption and modern slavery risks associated with the industry.
Conflicts of Interest – Personal	Whether a key representative of the supplier has disclosed personal relationships that could conflict with OceanaGold.	Conflicts of interest risk that could impact the arrangement.
Conflicts of Interest – Other Business Interests	Whether a key representative of the supplier has disclosed other business interests that could conflict with OceanaGold.	Conflicts of interest risk that could impact the arrangement.
Government Relationships	Whether the supplier or a key representative of the supplier has a relationship or connection with a government.	Bribery and corruption risks associated with political exposure.
Historical Conduct	Whether the supplier is subject to any economic sanctions or adverse media findings.	Sanctions, bribery, corruption, human rights abuses and/or other unethical activity.
Modern Slavery	Where the supplier sources goods or services from a country that is considered high risk for modern slavery OR where the supplier has labour conditions that are considered high risk for modern slavery.	Forced labour and child labour risk associated with goods or services offered.

Depending on the risks identified across these risk factors, further risk assessment activities are undertaken (including an additional questionnaire for suppliers rated as High risk) and appropriate controls are designed and implemented as required.

To assess and manage our existing suppliers, in 2024 we took a sample of our active and inactive (2022 and 2023) Tier 1 suppliers and assigned risk attributes based on the information available in our internal systems. This information was then uploaded into our third-party technology system to be analyzed against the risk methodology to produce a risk rating for each supplier, which is either Low, Medium or High (as is consistent with the approach taken for new suppliers). In December 2024, we implemented an Application Program Interface (API) protocol to prevent any suppliers from being paid by our

accounts team without the appropriate screening. We anticipate the overall risk rating mix to fluctuate over the next two to three years as we work to continuously improve the risk model and deepen our understanding of targeted suppliers by issuing due diligence questionnaires.

We also engage with suppliers as a part of our community development program delivery. To support screening of these suppliers, we completed a scoping activity to identify changes that would be required to improve supplier engagement, data reporting and management oversight via our existing due diligence technology platform. These changes are scheduled for implementation in 2025. Accordingly, during 2024, these suppliers were screened using our original risk assessment process, which includes a questionnaire and sanctions screening. No material findings were identified through this process.

Commitments for 2025:

- Commence the refresh of existing high-risk suppliers through use of due diligence questionnaires.
- Implement changes to our supplier due diligence process to commence screening of suppliers in our community development programs.

Mining truck at Macraes, New Zealand



Actions Taken to Assess and Address Modern Slavery Risks continued



Water treatment plant at Didipio, Philippines

**GRIEVANCE MECHANISMS,
REMEDIES AND REMEDIATION**

We recognize the importance of providing accessible and responsive grievance mechanisms at each of our sites. These support us to maintain positive relationships with our stakeholders and host communities, by providing us with the opportunity to:

- Identify issues early and prevent their escalation;
- Remediate concerns or harm for which OceanaGold identifies it has caused or contributed to; and
- Provide critical information for broader human rights (including modern slavery) due diligence processes and insights for operational process improvements.

We provide several mechanisms for employees, contractors and third parties to raise grievances, including modern slavery and human rights issues. These include a Code of Conduct hotline and site-level (operational) grievance mechanisms. A number of other internal channels (direct line management, People and Culture and ELT) are also available to raise concerns.

Code of Conduct hotline

Our Code of Conduct hotline service¹ provides an independently run and confidential channel for all employees, contractors and external stakeholders (including suppliers and their employees and contractors) to raise concerns about potential misconduct, including illegal and unethical conduct and serious breaches of our Code of Conduct, Supplier Code of Conduct and other policies, which could include instances of modern slavery.

In 2024, we transitioned to a new provider and technology system to support our Code of Conduct hotline to improve experience for people who raise concerns and enhance reporting and case management capability. Additional information is available in our [Whistleblower Policy](#). On a quarterly basis, we provide the Audit and Risk Committee with an overview of whistleblower complaints received, their status and any closure.

In 2024, we did not identify any instances of modern slavery impacts (including labour rights) or loss of income to the most vulnerable families through our Code of Conduct hotline.

Operational grievance mechanisms

We also have complaints and grievance mechanisms at each operation to record, monitor and respond to community enquiries, concerns and grievances and take corrective action as required. These mechanisms were developed in alignment with the criteria of effectiveness for non-judicial grievance mechanisms in the *UNGPs*.

We provide our Board Sustainability Committee with a quarterly summary report of community grievances and concerns received, their status and any closure.


We also disclose the number and nature of notifications received through our Code of Conduct hotline and our operational grievance mechanisms annually in our [Sustainability Report](#).

In alignment with our [Human Rights Policy](#) and associated [Standard](#), we are committed to ensuring the effectiveness of our grievance mechanisms and will endeavour to provide for, or cooperate in, remediation where we identify we have caused or contributed to adverse human rights impacts, including modern slavery. Remediation – where required – is designed and managed on a case-by-case basis. Formalizing our remediation processes will be the subject of a future work program.

In 2024, we did not identify any instances of modern slavery impacts (including labour rights) or loss of income to the most vulnerable families through our operational grievance mechanisms. We will continue to monitor and assess this risk and, should we identify any instances, we will apply remedies appropriate to the circumstances in accordance with international standards.

Commitment for 2025:

- Review our Grievance Management Standard and define formal escalation pathways for human rights grievances.

 [Sustainability Report](#)

¹ In 2024, we changed the terminology we use for talking about reporting a concern about potential misconduct, to make it easier to differentiate between this and speaking up for safety and our success ingredients. As part of this, we renamed the Speak Up hotline to Code of Conduct hotline and our Speak Up Policy to Whistleblower Policy.

Assessing Effectiveness

The following table provides an overview of the actions we took during 2024 to address modern slavery risks. We will continually assess the effectiveness of our actions and based on the results of these assessments we will adapt and strengthen our actions to continually improve our response to modern slavery risks. The table also includes commitments outlined in our 2023 Modern Slavery Statement.

ACTIONS TAKEN TO ADDRESS RISK OF MODERN SLAVERY	OUTCOMES
Strategic Roadmap Establish a multi-year approach to addressing modern slavery risk and track actions completed against this approach.	<div>✔ Conducted an analysis of regulatory expectations, internal improvements and market analysis to form a view of our future state goals.</div> <div>✔ Mapped a set of actions across 2025 to 2027 to facilitate future state goals being achieved.</div>
Corporate governance Developing and reviewing governance policies and standards to set our expectations with Tier 1 suppliers.	<div>✔ Supplier Code of Conduct was embedded as a mandatory acknowledgement for our suppliers within the supplier due diligence process.</div> <div>✔ Human Rights Policy was reviewed, updated and endorsed by the Board of Directors.</div>
Industry engagement Active collaboration and engagement with industry experts to improve subject matter expertise in modern slavery.	<div>✔ Engaged a consulting firm with expertise in human rights to develop and deliver a modern slavery risk training pack.</div>
Human rights training Deliver human rights training to employees in roles with the greatest human rights impact, including our security personnel. This includes monitoring participation rates of computer-based training and conducting targeted specialized training to specific groups.	<div>✔ Prepared to deliver human rights awareness training to the Board of Directors (delivered in February 2025).</div> <div>✔ Delivered modern slavery risk training to Legal, Procurement and other team members involved in the supplier due diligence process.</div>
2024 Commitment – Deliver updated human rights awareness training to the Board of Directors.	<div>✔ 501 (89%) out of 560 required employees have completed this training, including 100% of our ELT as at December 31, 2024.</div>
Operational risk assessment Conduct Human Rights Impact Assessments (HRIAs) across our organization and complete actions to mitigate risk.	<div>✔ All site HRIAs were reviewed and updated with appropriate action plans developed for each site.</div>

Ohinemuri River in Waihi, New Zealand



Assessing Effectiveness continued



Gold pour at Haile Gold Mine, USA

ACTIONS TAKEN TO ADDRESS RISK OF MODERN SLAVERY	OUTCOMES
Committees and working groups Develop effective management governance to make decisions on key responsible supply chain issues, including issue management and supporting improvement opportunities.	<div>✔ Working Group met regularly to discuss and engage on process improvements, risks, supplier engagements, resourcing and capacity to drive overall program performance.</div> <div>✔ Steering Committee provided:<ul style="list-style-type: none">oversight on Application Programming Interface (API) development and completion of Modern Slavery Statement 2023 commitments;consultation and input on options to refreshing existing supplier risk attributes;endorsement of proposed multi-year strategy to address modern slavery risk; andreview and endorsement of this Statement.</div>
Due diligence processes Conduct due diligence of suppliers to understand potential modern slavery risks associated with doing business and monitor for changes in this risk.	<div>✔ Analysis was conducted over existing suppliers to provide the Steering Committee with recommendations on alternate approaches to refreshing the supplier risk attributes.</div> <div>✔ Approach determined to conduct due diligence on existing suppliers over a 2-3 year period with High risk suppliers as priority. On-going due diligence will be performed on a case-by-case basis based on specific risk factors (e.g. focus on high risk industries, conflicts, government relationship suppliers, high-risk countries).</div>
2024 Commitments <ul style="list-style-type: none">Enhance processes that support a refresh of the supplier’s risk attributes at contract renewal.Commence scoping a process to support the review of suppliers in our community development programs.Finalize review of the 43 suppliers by leveraging the new supplier due diligence technology platform and risk methodology.Commence a review of the Sponsorships and Donations Standard to consider opportunities to integrate controls to manage potential human rights risks.	<div>✔ Process scoping for suppliers in our community development program was completed.</div> <div>✔ Finalized the review of the 43 suppliers identified as having a High inherent risk by leveraging our supplier due diligence technology platform.</div> <div>✔ Sponsorships and Donations Standard review commenced with a number of improvements scheduled for updates.</div>
Grievance mechanisms and remedies Ensure accessible and effective mechanisms to record, monitor and respond to grievances and provide remedy in a timely manner, reporting instances to the relevant Executives and monitoring over time.	<div>✔ No modern slavery issues raised through either the operational grievance mechanism channel or Code of Conduct hotline.</div> <div>✔ No instances of modern slavery impacts (including labour rights) or income loss through our formal feedback mechanisms.</div>
2024 Commitment <ul style="list-style-type: none">Implement a new hotline provider to improve reporter experience and enhance supporting processes.	<div>✔ Internal assurance completed on all site grievance mechanisms.</div> <div>✔ Implemented a new Code of Conduct hotline provider and case management system to improve experience for people who raise concerns and enhance reporting and case management capability.</div>

OCEANAGOLD CORPORATION

Suite 1020 – 400 Burrard Street
Vancouver, British Columbia V6C 3A6
Canada

+1 604 678 4123

For further information:
sustainability@oceanagold.com

oceanagold.com

TSX: OGC

OTCQX: OCANF

