

Modern Slavery Statement

Reporting period January – December 2020



Addressing human rights and modern slavery risks in our supply chain



safety



integrity



respect



responsibility



innovation



delivery



GOLD FIELDS



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About Gold Fields

Gold Fields is a globally diversified gold producer with ten operating mines and projects (including the Asanko Joint Venture) in Australia, Chile, Ghana, Peru and South Africa.

Gold Fields is the third largest gold producer in Australia and is proud of its strong presence in the Goldfields region of Western Australia. This presence comprises:

- The Agnew, Granny Smith and St Ives gold mines (wholly owned and operated by Gold Fields)
- The Gruyere gold mine, a 50/50 joint venture with Gold Road Resources (operated and managed by Gold Fields), which commenced production in mid-2019 (see *annexure on page 15*).

Gold Fields' Australian operations contribute approximately 45% of the Group's total gold production, and continue to benefit from a sustained program of investment in exploration (approximately A\$80 million per annum over the past six years). This program has seen an increase in attributable Mineral Reserves to around 7.5 million ounces and Mineral Resources of around 19.4 million ounces, supporting a long-term presence in the region.

Gold Fields employs approximately 1,700 employees and 1,400 contractors across its four operations in Australia and the Perth corporate office. Of our employees, approximately 63% work on a fly-in fly-out basis and stay in our accommodation villages located at the mines.





Our supplier base



We rely on a network of domestic and international suppliers to provide input materials associated with our exploration, development, construction, mining and processing activities. As a Group, we strive to source materials from local (in-country) suppliers, thereby maximising the amount of value generated in our countries of operation.

Our procurement activities in Australia are conducted centrally by our Supply Chain department, which forms part of the shared services team based at our corporate office in Perth.

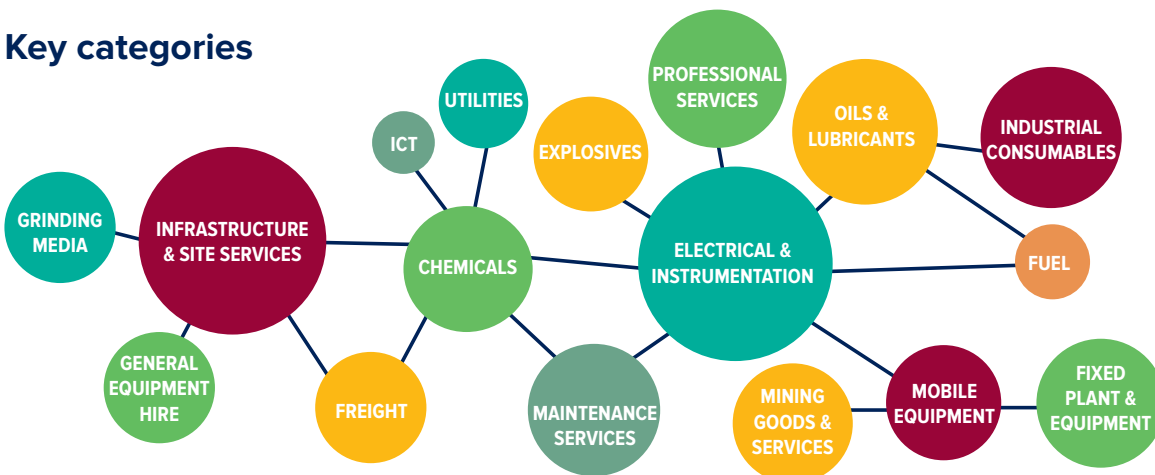
In Australia, 99% of our primary procurement is from in-country suppliers. Of that 99%, 23% is spent with businesses within our host communities, being Australian registered businesses with a physical presence in the Eastern Goldfields region of Western Australia.

The remaining 1% relates to more advanced and / or specialised supplies that are directly imported by Gold Fields.

While the modern slavery risk relating to Gold Fields' first tier suppliers is therefore relatively low, we are mindful that the second (and subsequent) tiers of our supply chain will have a stronger international connection, potentially sourcing supplies and utilising labour from higher-risk countries.

We currently collaborate with our first tier suppliers regarding the identification and management of modern slavery risks in our supply chains. Many of our larger suppliers are pro-active in this area, and we recognise that there are opportunities for us to learn and improve based on the experiences of our own suppliers, as well as assisting in building capacity where that is required.

Key categories



Gold Fields' commitment to human rights



Gold Fields' activities, from exploration through to mine closure and rehabilitation, have the potential to impact the human rights of our workforce, communities and those involved in our supply chain, which in turn could negatively impact our reputation and our ability to create value for our shareholders.

Gold Fields' commitment to respect the rights and dignity of its stakeholders is described in our Human Rights Policy Statement. The Policy Statement, which is embedded in our Code of Conduct, is aligned to the International Council on Mining and Metals performance expectations on Human Rights and is guided by the UN Guiding Principles on Business and Human Rights as well as the conventions of the International Labour Organisation. The Policy Statement also supports the United Nations Universal Declaration on Human Rights and the Voluntary Principles on Security and Human Rights.

Gold Fields' Code of Conduct, which is fully endorsed by its Board of Directors, guides our values, business ethics and behaviours. It applies to all directors, employees and third parties (including, amongst others, our suppliers and contractors), and training is delivered to all stakeholders.

Gold Fields considers that our Human Rights Policy Statement and Code of Conduct form the critical foundation upon which our approach to managing the risk of human rights abuses (including modern slavery) within our own operations and those of our contractors, suppliers and business partners, is based.



What is Modern Slavery?



Modern Slavery describes situations where coercion, threats or deception are used to exploit workers and deprive them of their freedom.

The term modern slavery is used to describe the most serious forms of worker exploitation. It does not include practices like substandard working conditions or the underpayment of workers, which are nonetheless absolutely unacceptable to Gold Fields. Gold Fields acknowledges that these practices can also be present in situations of modern slavery and can escalate into modern slavery practices if not addressed.



How does this impact Gold Fields?



Modern slavery can occur in every industry, sector and geographic location. It may often be linked to other criminal offences that adversely impact human rights, such as corruption and environmental damage.

The nature and extent of modern slavery means that there is a potential risk that modern slavery practices may be present in Gold Fields' operations and supply chain. Whilst Gold Fields is comfortable that its employment practices eliminate the risk of modern slavery practices within its Australian operations, it acknowledges that there is a risk that:

- We may contribute to modern slavery practices in our supply chains through our actions, for example by setting cost targets that may increase the risk of exploitative labour practices.
- We may be directly linked to modern slavery practices through the activities of our business partners, including our supply chain. This could occur, for example, through the use of goods assembled using forced labour, or may relate to the activities of entities within the supply chain that Gold Fields does not have a contractual relationship with (ie. suppliers to our suppliers).



The risk factors that contribute to this position are varied and complex:



Sector / industry risks

Certain sectors and industries have higher modern slavery risks because of their characteristics, products and processes. For example, where the use of unskilled or temporary labour is prevalent, or where the tasks are undertaken in an environment that is not openly visible (such as cleaning or security services that are often undertaken outside of core business hours).



Product / services risks

Certain products or services have higher modern slavery risks because of the way they are produced, provided or used. For example, where a product is made from materials or components reported to have a high risk of labour exploitation by international organisations (for example, protective clothing).



Geographic risks

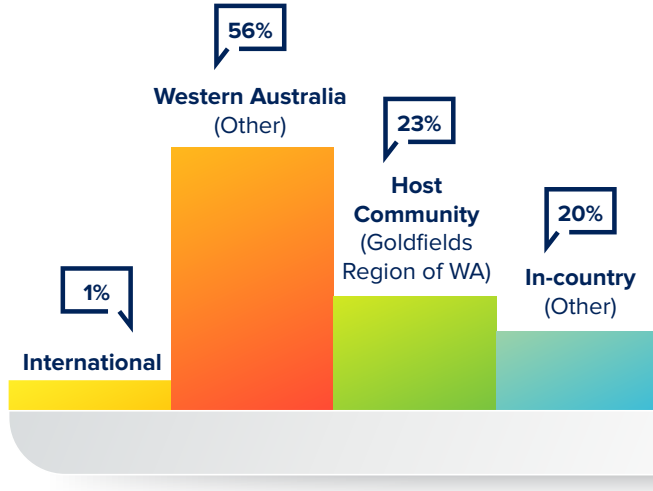
Some countries have higher risks of modern slavery due to poor governance, weak rule of law, conflict or poverty. These countries are likely to have inadequate protections for workers, and limited capacity to monitor workplace standards and enforce compliance with national or international standards.



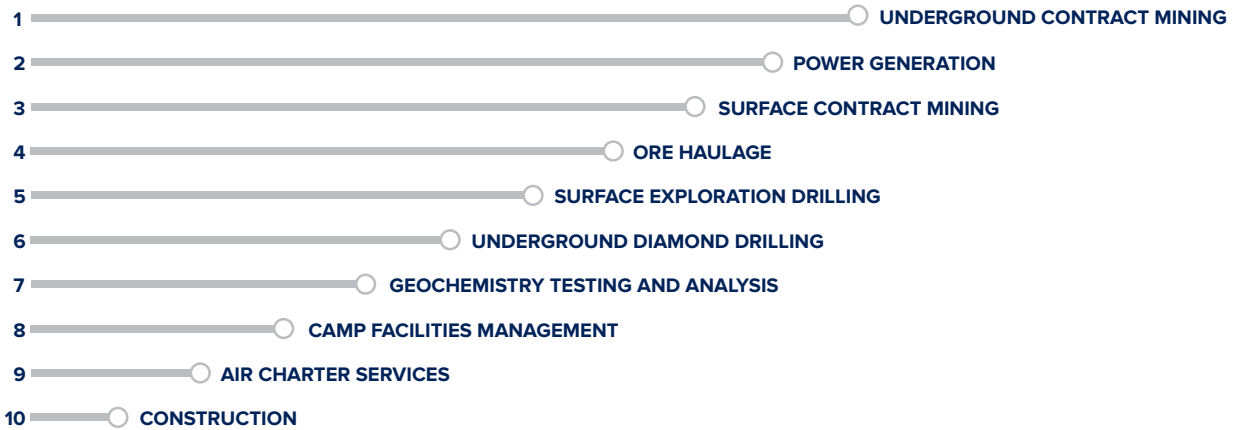
Entity risks

Some entities may have modern slavery risks due to poor governance structures, a record of treating workers poorly, or a public record of human rights violations.

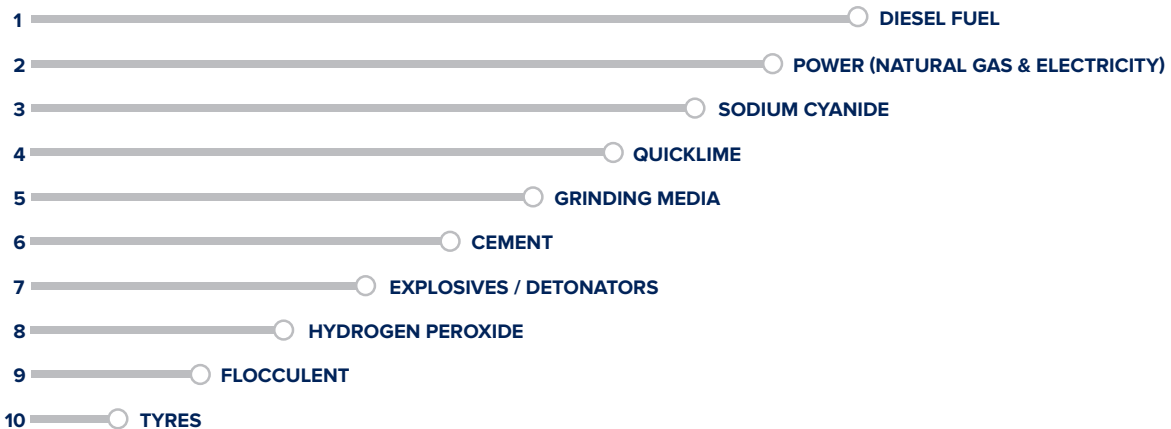
Supply Chain Spend Breakdown(%)



2020 Top 10 Services Procured (by spend):



2020 Top 10 Commodities Procured (by spend):



Addressing modern slavery risks in our supply chain

We are committed to understanding our supply chain and how human rights risks may arise, working with our suppliers and industry peers to promote human rights best practises, and ultimately eradicating modern slavery in the mining industry.

Gold Fields will support suppliers improving their understanding of modern slavery practices. It is expected that suppliers will have varying levels of understanding of modern slavery risks, and so activities focused on capacity-building through raising awareness will ultimately assist in addressing modern slavery risks that are identified.

Gold Fields' philosophy is that it will work with suppliers to reduce modern slavery risk exposure throughout its supply chain, and take appropriate action in relation to identified issues. These actions may include the engagement of third party auditors and/or the notification of relevant government agencies.

Blocking a supplier will be considered a last resort. This will only be applied when a supplier is unwilling to engage constructively either in Gold Fields' due diligence/risk screening process, or in remediating/mitigating identified modern slavery issues.

Supply Chain Processes

All of Gold Fields' third-party supply agreements require our counterparties to adhere to Gold Fields' Human Rights Policy Statement, Code of Conduct, Sustainable Development Policy and other policies relating to ethical business practices issued by the Group. In addition, Gold Fields mandates in its supply agreements that suppliers must not contribute to the abuse of human rights in respect of any supply made to Gold Fields. If a supplier is found to be in material breach of the terms of their contract with Gold Fields, including those terms outlined above with respect to human rights and adherence to our Code of Conduct, Gold Fields may suspend or terminate the contract with that supplier. Gold Fields' approach, where possible, is to work with our contracting partners to resolve any such issues in a reasonable timeframe.



Supplier Code of Conduct

In 2018, Gold Fields developed a Supplier Code of Conduct, which translates the requirements of the Gold Fields Code of Conduct into terms appropriate to our suppliers and contractors. A copy of this document is available on our website at www.goldfields.com/supplier-resources.php and is also provided to all new contractors and suppliers in Australia during the onboarding process.



Collaboration

Gold Fields is an active member of the WA Modern Slavery collaborative (WAMSc) industry group, which was formed to provide a forum for companies in the resources and energy sectors to share knowledge and develop resources to combat modern slavery across our industries. There are currently 22 members of the WAMSc. Gold Fields is also a member of the Remediation Sub-Committee of that group, which is working closely with the Walk Free Foundation to create a Remediation Protocol to be used by members.



Third-party screening solution

Gold Fields uses an external third-party screening solution to screen new and existing suppliers for an array of pre-defined risk categories, including human rights and related violations. The screening solution screens all suppliers and contractors on a monthly basis for adverse media exposure alerts involving regulators, governments, recorded discrimination, workers' rights issues and human rights transgressions in the workplace.



2020 completed actions



In 2020, Gold Fields continued its program of training internal stakeholders, both in the Perth office and across our Australian operations in order to improve understanding of modern slavery risks, identify potential indicators of modern slavery practices within our supply chain, and provide guidance on how to respond to those risks.

In conjunction with WAMSc, Gold Fields also developed a Modern Slavery toolkit, comprising an 'Understanding Modern Slavery' brochure, frequently asked questions, and a Human Rights Supplier Self-Assessment Questionnaire (SAQ). The SAQ is designed to support the identification of modern slavery risks, foster collaborative efforts between suppliers and organisations to address those risks, improve supply chain transparency, and identify areas for further due diligence.

Gold Fields rolled out the SAQ to selected suppliers as part of a pilot program in 2020, using a supplier risk assessment tool. Gold Fields assessed the responses provided by suppliers and engaged with them on the information provided. This provided an opportunity for Gold Fields to explain modern slavery concepts to suppliers who were not aware of them. Where risks were identified, remedial actions were taken.

Gold Fields identified a small number of historical cases where employees hired from overseas were required to pay labour hire recruitment fees. This was remediated by Gold Fields reimbursing the recruitment fees and a change in Company policies regarding such fees.

Upon the completion and assessment of the pilot program, Gold Fields committed to including the SAQ as part of all new tenders and contract renewals.

Gold Fields commissioned an online platform (the Modern Slavery Risk Framework) to assess supplier risk using data from multiple sources, including the SAQ. Over 1350 suppliers have been loaded into the portal to date. The portal has provided a useful high level 'heat map' analysis of modern slavery risk in our supply chain and has assisted in the deployment of the SAQ. Feedback from internal stakeholders and suppliers has identified areas for improvement in terms of the useability of the portal, and some gaps in the automated data analysis process, which will be an area of focus in 2021.

Whilst the SAQ is a valuable tool and critical input, Gold Fields appreciates that it should not be relied on as the sole measure of a supplier's modern slavery compliance risk. Gold Fields' Modern Slavery Risk Framework incorporates data from other reference sources, which are designed to moderate supplier human rights self-assessment scores and provide a more holistic assessment.

Gold Fields also reviewed:

- its contract terms to specifically address modern slavery related issues, including, but not limited to, rights to information, audit rights, and reporting obligations; and
- its 'Information for Suppliers and Contractors' booklet to specifically address Gold Fields' commitment to the eradication of modern slavery and its expectations of suppliers in relation to human rights and modern slavery.

2021 planned actions



Gold Fields is preparing a Group-wide human rights e-learning program that will be rolled out across the organisation in 2021. This program will include content relating to modern slavery risks.

In addition, Gold Fields representatives are working with WAMSc and Walk Free to:

- **Create a set of Modern Slavery Protocols** that underpin our commitment to combat the risk of modern slavery in our operations and supply chains; and
- **Prepare a Remediation Protocol** outlining the actions companies may take to provide or facilitate remedy in situations where they have caused, contributed to, or are directly linked to modern slavery and associated risks.

Gold Fields will undertake further training within its organisation to cultivate an understanding of (and engagement with) the Modern Slavery Protocols, the Remediation Protocol and Gold Fields' commitments set out in this Modern Slavery Statement.

A focus in 2021 is working closely with our Human Resources Team and Labour Hire Contractors regarding sourcing labour from overseas to ensure that no employee pays recruitment hire fees.

Gold Fields will continue to require suppliers to complete the SAQ when responding to tenders and when contracts are renewed.

In addition, Gold Fields will undertake a category risk assessment (including spend category, country risk, labour intensity, skills level, health and safety, and use of raw materials) to determine those higher risk suppliers that require further due diligence and assessment. Follow up and remediation will be undertaken as required.



Reporting Entities Declaration



This statement is provided on behalf of the Gold Fields entities below and approved by each of their principal governing bodies. The statement has been prepared in consultation with each reporting entity and has addressed each of the mandatory reporting criteria for each entity.

Entity	Australian Business Number (ABN)
Agnew Gold Mining Company Pty Ltd	39 098 385 883
Agnew Holding Company Pty Ltd	27 165 234 659
Gold Fields Australia Pty Ltd	91 098 385 285
Gruyere Holdings Pty Ltd	65 615 728 491
Gruyere Mining Company Pty Ltd	11 615 729 005
Gruyere Management Pty Ltd	33 615 728 795
GSM Holding Company Pty Ltd	91 165 234 051
GSM Mining Company Pty Ltd	42 165 235 030
St Ives Holding Company Pty Ltd	97 165 234 515
St Ives Gold Mining Company Pty Ltd	44 098 386 273



This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth), and is authorised by the boards of directors of each of the above Reporting Entities.

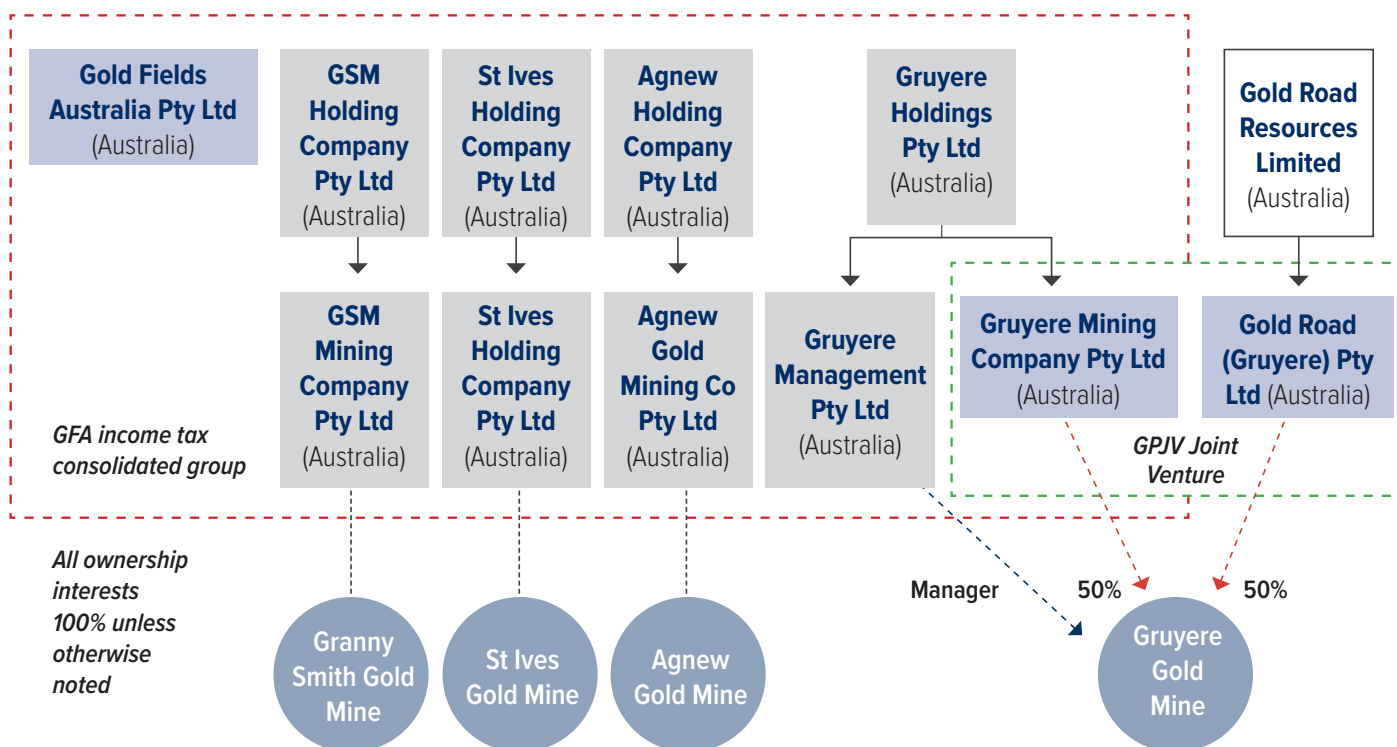
Signed by:

Stuart Mathews

Executive Vice President: Australasia / Director

Annexure

Gold Fields Australia Reporting Entities





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