



2020 Modern Slavery  
Statement

## 2020 Modern Slavery Statement

Ramelius Resources Limited's Modern Slavery Statement (**Statement**) outlines the Company's approach to assess and address its modern slavery risks.

The Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**) and relates to the period 1 July 2019 to 30 June 2020.

### **Reporting entity**

This is a joint statement made on behalf of the following entities, which we have determined are reporting entities under the Act:

- (a) Ramelius Resources Ltd (ACN 001 740 540), the Ramelius Group's parent company;
- (b) Mt Magnet Gold Pty Ltd (ACN 008 669 556) which owns and operates the Mt Magnet Mine; and
- (c) Edna May Operations Pty Ltd (ACN 136 635 001) which owns and operates the Edna May Mine.

Unless expressly stated otherwise, references to 'we', 'us' and 'our' refer to the Ramelius Group of companies as a whole including the reporting entities listed above. This Statement does not extend to non-managed sites unless expressly stated.

This Statement was approved by the Board of Ramelius on 24 March 2021 on behalf of itself and the other reporting entities listed above.

This document should be read in conjunction with Ramelius' other periodic and continuous disclosure announcements lodged with the ASX, including its FY20 Annual Report and FY20 Corporate Governance Statement, which are available at [www.rameliusresources.com.au](http://www.rameliusresources.com.au).

Except as required by applicable laws or regulations, the Ramelius Group does not undertake to publicly update or review any forward-looking statements, whether as a result of new information or future events. Monetary amounts in this document are reported in Australian dollars, unless otherwise stated.

## Ramelius' Managing Director on Modern Slavery

Dear Ramelius stakeholders,

I am pleased to present the inaugural Modern Slavery Statement of Ramelius Resources Ltd and its consolidated subsidiaries (together **Ramelius**) for the reporting period of 1 July 2019 to 30 June 2020 under the *Modern Slavery Act 2018* (Cth) (**Act**).

Modern slavery describes situations where coercion, threats or deception are employed to exploit victims and undermine their freedom. It is defined by the Act to include human trafficking, slavery, servitude, forced labour, debt bondage, child labour and forced marriage.

Honesty, fairness and respect are Ramelius' core values, and tackling modern slavery and respecting human rights are inexorably linked to these values.

This statement summarises actions undertaken by Ramelius in FY20 to assess, identify and mitigate the risks of modern slavery in our operations and supply chain.

While no instances of modern slavery have been identified in our business, we are committed to ensuring that we are able to identify and minimise the risk of modern slavery from occurring in our operations and supply chain.

Key actions during FY20:

- Formed a new Risk and Sustainability Committee to assist the Board in its responsibilities of overseeing risk, governance, and sustainability activities which included the adoption of our Modern Slavery and Human Rights Policy.
- Undertook an assessment to identify key modern slavery risks in our operations and supply chain.
- Established systems to protect the health and wellbeing of our workforce during the COVID-19 pandemic.
- Updated our supplier contracts with modern slavery provisions.

Ramelius was cognisant of the risk of labour exploitation during the COVID-19 pandemic and took steps to minimise its impact on our business operations and supply chain.

We are pleased with the progress we have made over the last year; however, we recognise that the challenge of eliminating modern slavery is significant, and we are committed to continuously strengthening our approach to safeguard basic human rights.



Mark Zeptner  
Managing Director  
Ramelius Resources Limited

## Ramelius' structure, operations and supply chain

### About Ramelius

Ramelius Resources Ltd is headquartered in Perth, Western Australia and is a leading Australian mid-tier gold producer. We are listed on the Australian Securities Exchange (**ASX**) and are included in its S&P/ASX 200 index under the code "RMS".

Ramelius is a Western Australian gold producer headquartered in East Perth with approximately 400 employees. We were incorporated in 1979, listed on the ASX in 2003 and have been in production since 2006.

Ramelius and our subsidiaries are engaged in the exploration, mine development, and production and sale of gold in Australia.

We own and operate the Mt Magnet Gold Mine, the Vivien Gold Mine, the Edna May Gold Mine and the Marda Gold Project and associated processing plants around Western Australia (see map on page 5).

Ore from the high-grade Vivien underground mine, located near Leinster, is hauled to the Mt Magnet processing plant where it is blended with ore from both underground and open pit sources at Mt Magnet.

The Penny project is currently under development with first ore in late FY2022.

The Edna May operation is currently processing high grade underground ore, low grade stockpiles, as well as ore from the adjacent Greenfinch open pit and the satellite Marda open pit mines. Ore feed from the Tampia open pit project is planned for early FY2022.

Ramelius has enjoyed significant success in recent years with increased gold production and the addition of new WA gold mining projects: Tampia and Penny.

In addition to the operations listed above, Ramelius is involved in:

- Three WA-based exploration projects: Mt Magnet, Edna May and Holleton (including Symes' Find, Tampia and Marda)
- One US-based farm-in/joint venture: Jupiter Gold Project in Nye County, Nevada (Ramelius: 75%, Renaissance: 25%)

Having our offices and operations in Australia limits our exposure to modern slavery risk due Australia's strong regulatory framework.

Additional information about our assets and owned and controlled entities is available on our website and in our 2020 Annual Report.



### Mission statement

"To be a sustainable gold producer that focuses on delivering superior returns for stakeholders"

### Our Values

At Ramelius, we are defined by the following core values:

- Honesty
- Fairness
- Respect

Our culture is defined by a 'fit-for purpose and can-do' attitude.

### Our Corporate Strategy

- Actively seek to grow annual production beyond 300koz gold
- Anticipate maintaining mine life at five years or more through exploration and acquisition
- Work to achieve our strategic targets consistent with our stated sustainability policy

### Sustainability

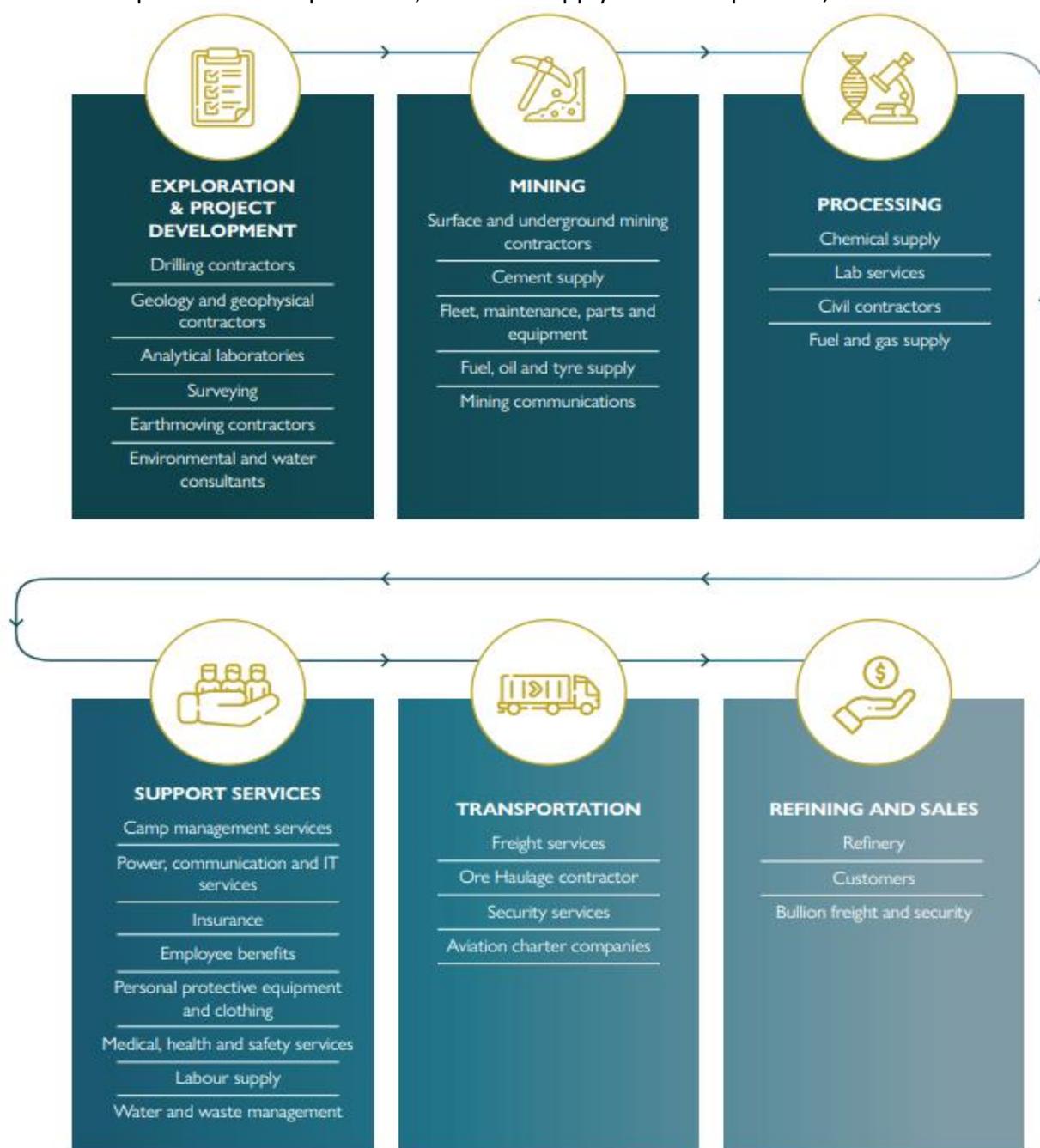
We believe a sustainable gold producer should deliver more than just financial benefit. It's about the way we do business, the relationships we build with our people and communities and the efforts we make to conserve the environment.

## Our supply chain

Our contractors and suppliers are critical to our business and are relied upon to ensure that we deliver on our strategy. With the exception of \$0.6M (mostly in Canada and the US) we acquired \$361M of goods and services directly from Australian suppliers, though some components of goods may be sourced from overseas by these suppliers. The supply chain for the mining and mineral processing at our operations includes a wide range of goods and services, including:

- Electricity, oil, fuel and gas
- Consumables, such as explosives, cement and chemicals
- Equipment for IT and communications
- Services associated with surface and underground mining operations (earth moving, drilling, maintenance, labour) and related (camp management, assaying, transportation and refining).

The various phases of our operations, and their supply chain components, are shown below:



## **Modern Slavery risks in Ramelius' operations and supply chains**

The identification and management of risk is fundamental to Ramelius' successful pursuit of its corporate strategy. We have a risk management regime that assists the Board, our Risk & Sustainability Committee and management in identifying and addressing risks that may impact the Ramelius Group.

The mining industry in Australia is not considered to be high risk for modern slavery (please see <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>).

In consultation with management and key internal stakeholders we considered our modern slavery risk across the group, having regard to geography, product, sector and our industry. Ramelius believes its operations, including the goods and services that it procures, give rise to a low modern slavery risk on the basis that our offices, operations and suppliers are Australian-based and thus subject to a strong regulatory environment. The most relevant areas for our operations are indigenous peoples and communities in which we operate, procurement of certain goods (part of which may be sourced overseas e.g., PPE) and services (e.g., catering) and labour conditions. All ore we produce is delivered to the Perth Mint; we do not sell to other entities that may require the use of international shipping services.

Save for limited expenditure of \$0.6M on mostly North American suppliers, all of our goods and services (worth \$361M) were procured from Australian providers. Goods are sourced directly from Australian suppliers, although in some instances components of goods may be sourced from jurisdictions outside of Australia. In such instances, we are also guided by the UN Guiding Principles on Business and Human Rights (specifically modern slavery risk arising further down the supply chain). Similarly, while there may be some limits on visibility in relation to the small number of subcontractors in our supply chain (but are nevertheless bound by the underlying procurement agreement), all personnel, whether Ramelius or contractor-engaged, are subject to Australian employment law and undertake various induction and other training and qualification programs. We also include modern slavery provisions in our contracts, which permit us to escalate or terminate contracts where appropriate or required.

Complementing the legislative regime, Ramelius regularly reviews and updates its policies (such as our Code of Conduct, Indigenous Peoples and Community Consultation) and processes and our management of the same through training, reporting and auditing.

Ramelius is committed to the safety and wellbeing of its employees and contractors and has a system of policies, standards and procedures in place to support a workplace where participants can flourish and safely contribute to the Company's success.

## **Ramelius' approach to assessing and addressing Modern Slavery risk**

### **Governance and Policies**

Good corporate governance is the basis on which business objectives and stakeholder value depend. Ramelius regularly reviews governance practices and policies in order to incorporate changes in law and best practice into our governance processes.

Through our Risk & Sustainability Committee, the Board oversees sustainability strategy, measures performance and considers sustainability risks and opportunities. Day-to-day oversight of sustainability operations and administration is the responsibility of our CEO, who in turn delegates specific responsibilities to the senior management team.

We follow the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations which require the Board to carefully consider the appropriate corporate governance policies and practices needed to meet stakeholder expectations, such expectations include our commitment to human rights.

We also take guidance from the Mining Principles published by the International Council on Mining & Metals. These define good practice environmental, social and governance requirements for the mining and metals industry.

Our Corporate Governance Statement is released in October each year. The most recent statement is available on our website.

The Risk and Sustainability Committee's Charter, along with other relevant documents, are found on our webpage. In the context of modern slavery and human rights, the Committee also has oversight of the following, which are integral to our approach and allow us to set clear expectations for employees, suppliers and other stakeholders:

- (a) Our Code of Conduct sets out the standards expected of employees and contractors. It details what we stand for, how we interact with our stakeholders and what they can expect from us. All employees and embedded contractors are required to complete Code of Conduct training at induction.
- (b) Our Modern Slavery and Human Rights Policy sets out our commitment to respect the human rights of all our stakeholders, ensuring the fundamental freedom and basic human rights of all individuals. Guided by the UN Guiding Principles on Business and Human Rights, the policy includes a specific commitment to provide equal opportunity and to avoid all forms of discrimination in the workplace. We include modern slavery clauses in our standard contracts and intend to include them in our training programs.
- (c) Our Anti-Bribery and Corruption Policy strictly prohibit activities involving bribery, corruption, unauthorised payments or exercising improper influence by all employees and contractors, and require compliance with applicable laws wherever we conduct business. We include anti-bribery and corruption clauses in our standard contracts.
- (d) Our Indigenous Peoples and Community Consultation policies outline our approach to engagement with the communities in which we operate, in areas such as acceptable behaviour and employment opportunities. Ramelius considers native titleholders and

communities as one of our core stakeholder groups. We strive to work from a position of respect for indigenous culture, traditions and cultural sites and endeavour to foster a spirit of cooperation, with the aim of creating goodwill, mutual awareness, understanding and respect. As outlined in our Indigenous Peoples Policy, we work with Aboriginal representatives to improve communication and better understand the views and beliefs of the indigenous communities local to our operations. We aim to ensure that employees and contractors approach culturally significant sites with respect and a clear understanding of importance of the land to indigenous communities. We are committed to taking appropriate steps to identify and reduce the effects of any unforeseen impacts from its activities on indigenous communities, land, culture, traditions and cultural sites.

### **Suppliers**

We engage with suppliers during all stages of the contract process, from the initial tender to the final close-out meeting. This formal and informal contact allows us to consider all aspects of a supplier's business and to identify matters that may need further attention or remediation.

Our standard supplier contracts contain anti-corruption and modern slavery clauses, which require suppliers not to engage in conduct inconsistent with Australian and international laws and standards. We have the right to terminate a supplier contract for breaches of these provisions, although to date we have not terminated a supplier contract on these grounds. Future actions include the consideration of a formal supplier code of conduct and the use of a questionnaire to gauge the risk of modern slavery in their operations. We do not audit suppliers in relation to modern slavery risks but this may change as we continue to mature our supply chain approach.

### **Risk management**

Risk management at Ramelius is ultimately overseen by our Board of Directors. The Board, Audit and Risk & Sustainability Committees and management regularly review the risk portfolio of the business and the effective management of risks. In FY20 we initiated a new framework which comprises the requirements and processes for managing risk and sustainability in line with the Company's requirements. Its development and implementation are ongoing and we will report further in due course.

Risk registers are held for each of our sites as well as the corporate office. Each risk register is formally reviewed and updated at least annually and is used in the budget planning process to prioritise expenditure in an effort to mitigate risk.

### **COVID-19 response**

The COVID-19 pandemic presented new challenges for our employees and contractors. To ensure the health and safety of every person working at Ramelius, their families and communities during the COVID-19 pandemic, we operate all our sites in strict adherence to advice from State and Federal health authorities. We also restricted non-essential travel, initiated management response plans and implemented remote working options where possible. To help manage supply chain risks, preference was given to sourcing from existing suppliers. We were also able to use our existing relationships with suppliers to help support the provision of PPE and medical supplies to local communities located near our operating sites.

Collectively, these endeavours minimise risk from the COVID-19 pandemic to our employees, contractors, operations and the communities in which we operate.

In FY20, there was no material impact on Ramelius' operations from COVID-19. Ramelius continues to employ a variety of approaches to mitigate the impacts of the pandemic in accordance with requirements outlined by the Australia Government Health Department, the Government of Western Australia's Health Department and WA's Department of Mines, Industry Regulation and Safety.

### **Whistleblowing**

In FY20, Ramelius introduced a whistleblower mechanism through our Human Resource Management Policy to enable all directors and employees to report, without the risk of penalty or retribution to themselves or others, concerns about any questionable conduct or practice.

Our *Diversity* and *Human Resource Management* policies together with our *Code of Conduct Policy* enshrine our commitment to operate a workplace free from discrimination and harassment, in which individuals are treated with respect, equity, dignity and fairness. The Policies and Code set out the procedures to address grievances and complaints including those relating to discrimination, harassment and bullying.

Going forward, we intend to bolster the grievance services provided and undertake efforts to raise awareness among employees and contractors.

### **Assessing the effectiveness of our approach**

Reviewing the effectiveness of our approach to modern slavery risk is critical to improvement.

We are committed to a process of continuous improvement. This includes:

- Reviewing the risk of modern slavery when carrying out our annual risk management process;
- Engaging external advisors to undertake an independent gap analysis of our policies and practices;
- Conducting an independent supply chain risk assessment;
- Reviewing and improving our due diligence and supplier engagement systems
- Benchmarking our approach against our peer companies; and
- Developing and rolling out workshops and training across our sites on a number of matters, including modern slavery.

### **Consultation with owned and controlled entities**

All our owned and controlled entities operate under Ramelius policies and process, including in relation to human rights and modern slavery. Details of such entities can be found in our Annual Report which is available on our website.