



# Westgold Group

# Modern Slavery Statement FY23

24 April 2024

# Modern Slavery Group Statement FY23

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# Westgold Group Overview

## Reporting Criteria #1 – Modern Slavery Group Statement

- This statement is made under the *Modern Slavery Act 2018* (Cth) for the period ending 31 December 2023.
- The Westgold Group operates within Western Australia.
- This statement details the steps the Westgold Group has taken to assess modern slavery risks within its operations and supply chains, and the actions taken to manage those risks.
- Westgold is committed to upholding human rights and eradicating modern slavery from our operations and supply chains. Our Core Values guide our approach:
  - **Choose Safety:** We prioritise the well-being of everyone involved in our mining practices. This means creating safe working environments throughout our supply chain and preventing situations that endanger worker health and safety. It also means ensuring fair treatment of workers, as unsafe conditions often arise from exploitation.
  - **Show Respect:** We treat all individuals with dignity, regardless of their position or origin. This translates to fair wages, safe work environments, and a work culture free from coercion or exploitation. By showing respect, we create an environment where workers feel empowered to speak up if they see potential risks of modern slavery.
  - **Create Value:** True value creation in mining goes beyond just resource extraction. We are committed to responsible practices that benefit our employees, communities, and the environment. This includes ensuring ethical sourcing throughout our supply chain, which helps prevent modern slavery and contributes to a sustainable future for everyone involved.
- Through our Core Values, we implement comprehensive policies, procedures, and supplier engagement strategies to identify and mitigate modern slavery risks.

# Westgold Group Overview

## Reporting Criteria #2 – The Westgold Group

- This is a joint statement published on behalf of the Westgold Group comprised of the following entities (shown in Figure 1):
  - Westgold Resources Limited
  - Aragon Resources Pty Ltd
  - Big Bell Gold Operations Pty Ltd
  - Westgold Mining Services Pty Ltd
- Westgold is an explorer, developer, and producer of gold in the Murchison region of Western Australia. The company controls a large area of land (over 1,300 km<sup>2</sup>) with several operations, including Fortnum Gold Operations, Meekatharra Gold Operations, and Cue Gold Operations (Figure 2).

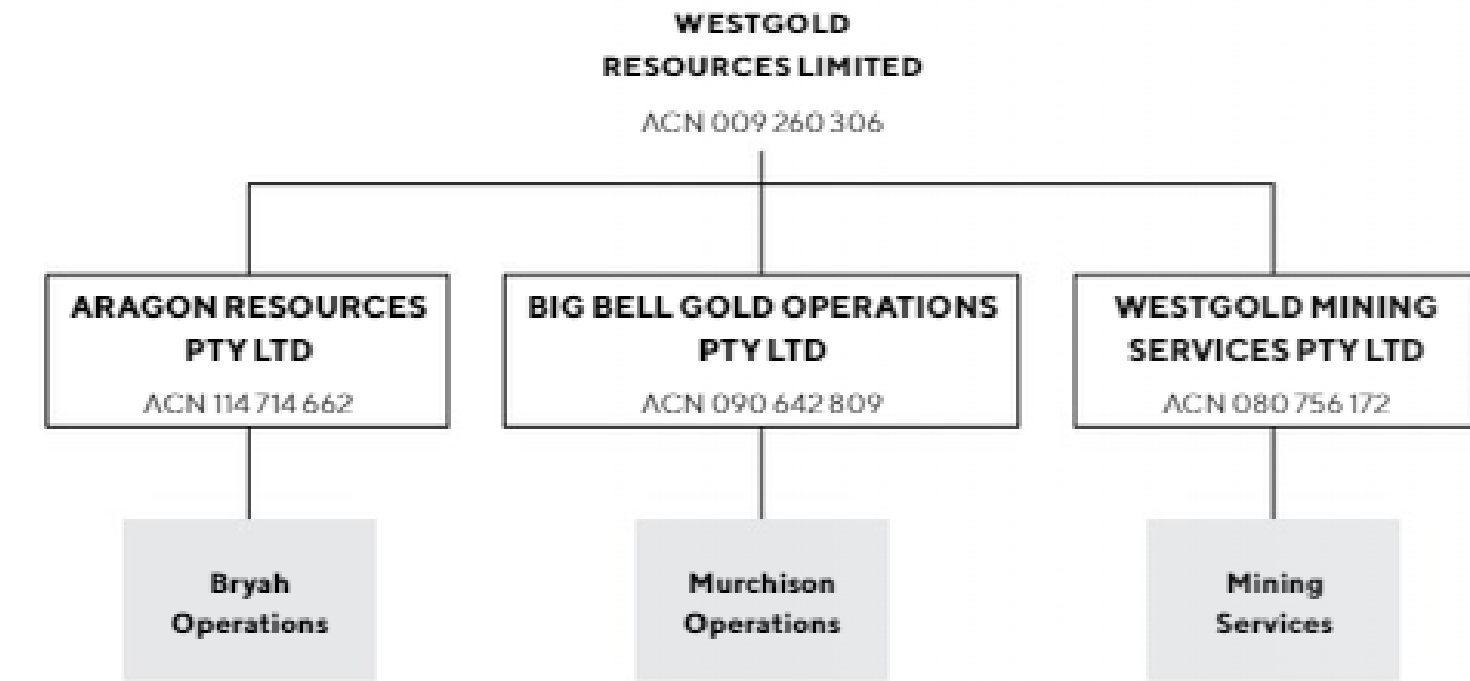


Figure 1: Company Structure

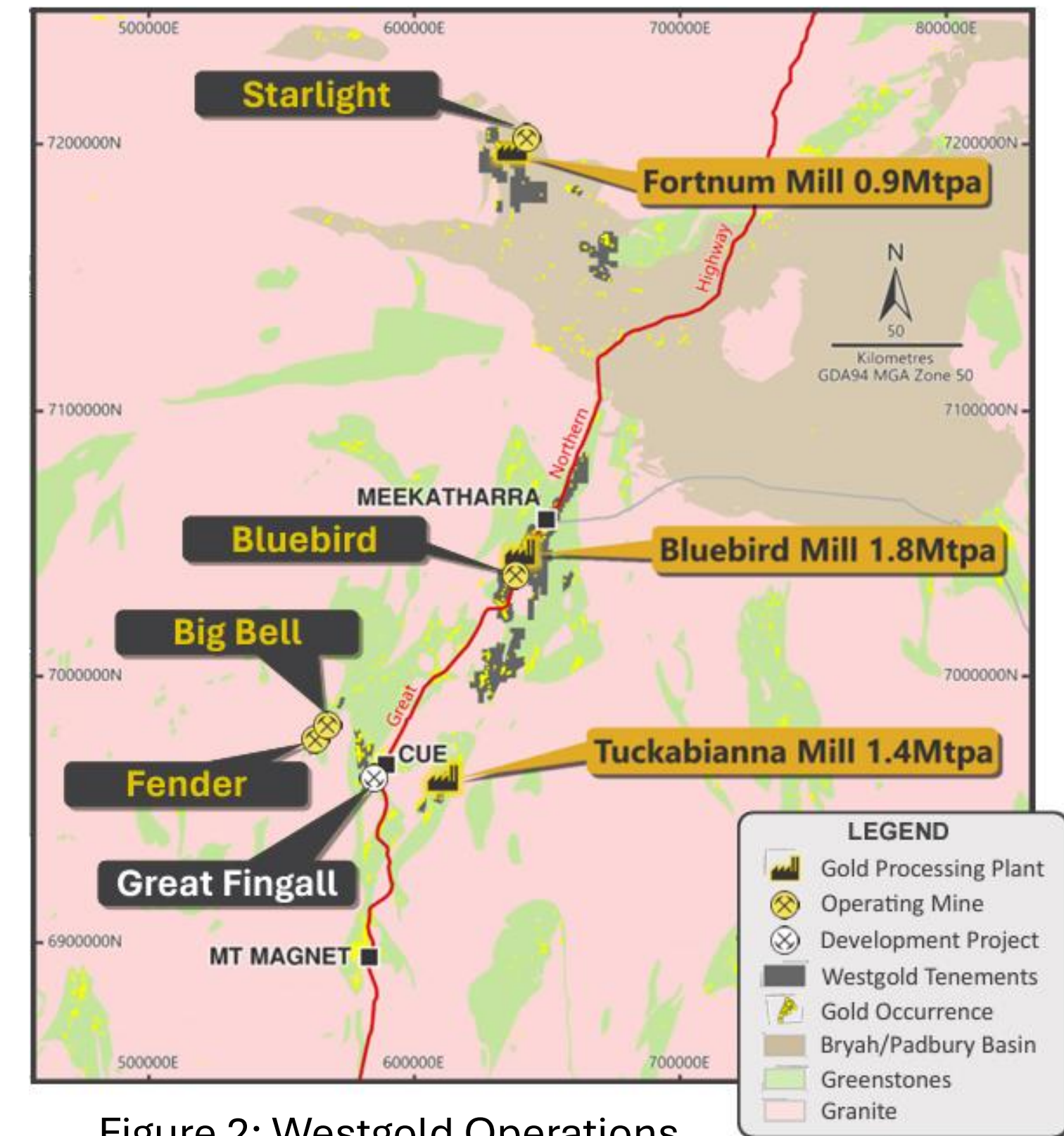


Figure 2: Westgold Operations

# Westgold Group Overview (cont.)

## Reporting Criteria #2 – The Westgold Group – Supply Chain

- The Westgold Group’s supply chain includes the procurement of goods and services.
- The Westgold Group has approximately 1,300 suppliers.
- Our supply chains include the following services and products:
  - Commodities (goods) ranging from general consumables, maintenance spare parts, mining equipment (CAPEX), reagents and fuels.
  - Services involving external service providers (contractors) who perform a range of services supporting exploration, mining & milling activities.
  - Labour Hire – provision of short term labour hire to support ad hoc works and short term role vacancies as required.
- The majority of Westgold’s suppliers are located in Western Australia.
- The Westgold Group recognises that its suppliers may source products from outside Australia, which has the potential to present modern slavery risks.

# Westgold Group – Supply Chain Assessment

## Reporting Criteria #3 – Describe the risks of modern slavery practices in operations or supply chain

- Westgold recognises the potential risks of modern slavery practices existing within our own operations and throughout our supply chains. These risks include:
  - Forced labour: Employees being coerced or threatened to work against their will.
  - Debt bondage: Employees being trapped in a job due to accumulated debt.
  - Human trafficking: People being deceived or forced into exploitative labour situations.
  - Child labour: Employment of individuals below the legal minimum working age.

- **Key Risks**

We recognise that these risks are particularly relevant to:

- **Supply Chain Management:** Complex or global supply chains can obscure labour practices, increasing the risk of modern slavery.
- **Recruitment:** Unethical recruitment practices or agencies could exploit vulnerable individuals.

# Westgold Group – Supply Chain Assessment (cont.)

## Reporting Criteria #4 – Describe the actions taken to address risks

- The Westgold Group prioritises ethical labour practices throughout its operations. It focuses on three key areas to mitigate the risk of modern slavery in our recruitment practice: fair compensation, appropriate working hours, and minimum legal working age (Table 1).

Table 1: Actions to Assess and Address Risks in Recruitment

Recruitment Risk	Description	Mitigation Strategies
<b>Hours of Work</b>	Australian regulations establish limitations on working hours.	Established procedures to manage working hours and ensure compliance with regulations.
<b>Compensation</b>	Australian regulations and industry standards establish minimum compensation levels.	Compensation is benchmarked against industry standards and adheres to relevant awards and regulations.
<b>Minimum Age</b>	Regulations establish minimum working ages.	Adherence to regulations regarding minimum working age. Specific procedures for apprentices, including minimum age requirements and guardian appointments.

- COMPREHENSIVE SUPPLIER ON-BOARDING PROCESS**
- The Westgold Group operates across a diverse supply chain, encompassing various categories such as mining equipment and cleaning services (Table 2). It acknowledges the inherent risk of modern slavery within these categories due to the prevalence of complex global supply chains and industry risk profiles.
- To address these concerns, a Supplier Charter has been developed to outline our expectations for ethical labour practices throughout our supply network.
- The Supplier on-boarding process involves a due diligence process whereby supplier certifications, insurance and policies are reviewed and approved.

Table 2: Actions to Assess and Address Risks in the Supply Chain

Supply Chain Risk	Description	Mitigation Strategies
<b>Mining Equipment</b>	Labour practices in equipment assembly: Fabrication of parts in high-risk countries.	Partner with reputable suppliers with strong anti-slavery practices.
<b>Mining Consumables</b>	Manufacturing practices: Sourcing of raw materials (timber, fabric, metals, glass) from high-risk countries.	Prioritise suppliers with ethical sourcing policies.
<b>Mining Services</b>	Vulnerable workers: Use of subcontractors and agents.	Include anti-slavery clauses in contracts with service providers. Require subcontractors to demonstrate responsible labour practices.
<b>Transport Services</b>	Vulnerable workers: Use of subcontractors and agents	Include anti-slavery clauses in contracts with transport companies.
<b>Grinding Media</b>	Manufacturing practices in high-risk countries: Forging and fabrication.	Source grinding media from reputable suppliers with strong anti-slavery practices.
<b>IT Equipment &amp; Software</b>	Manufacturing practices in the IT equipment supply chain: Raw material sourcing for electronics manufacturing.	Partner with IT suppliers committed to ethical sourcing. Encourage transparency in the IT supply chain.
<b>Cleaning</b>	Potential for exploitation: Low-skilled, vulnerable workforce.	Include fair work standards in cleaning service contracts.
<b>Hospitality &amp; Food Services</b>	Risks throughout the supply chain (suppliers, producers, distributors, caterers).	Partner with reputable food service providers with ethical sourcing practices.
<b>Facility Maintenance</b>	Prevalence of subcontracting and potential for blurred responsibility for worker rights.	Include anti-slavery clauses in maintenance contracts.
<b>Corporate Merchandise</b>	Mass production in high-risk countries: High risk of modern slavery in garment industry supply chains.	Source corporate merchandise from suppliers with strong ethical labour practices. Prioritise suppliers who can demonstrate transparency in their supply chains.
<b>Postal &amp; Courier Services</b>	Vulnerable workers: Use of subcontractors and agents.	Include anti-slavery clauses in contracts with delivery companies.
<b>Furniture</b>	Manufacturing practices: Sourcing of raw materials (timber, fabric, metals, glass) from high-risk countries.	Prioritise furniture suppliers with ethical sourcing policies.
<b>Travel Services</b>	Complex travel service supply chains: Vulnerable workforce in hotels and airlines.	Partner with reputable travel management companies with strong anti-slavery practices. Encourage transparency within the travel service supply chain.

# Westgold Group – Supply Chain Assessment (cont.)

## Reporting Criteria #4 (cont.) – Due Diligence and Remediation Processes

- The Westgold Group is committed to combating modern slavery in all forms throughout its operations and supply chain. Our approach ensures consideration of the following key aspects:
  - Our Core Values and Code of Conduct guide ethical behaviour for all employees, contractors, and directors. These principles promote integrity, responsibility, and respect for human rights.
  - We offer fair and competitive compensation to attract and retain qualified talent.
  - We foster a supportive environment where employees feel encouraged to speak up about potential misconduct or unethical behaviour. Our Whistleblower Policy protects those who report concerns.
- As a purchaser of goods and services, we strive to:
  - Partner with suppliers who share our commitment to human rights and ethical standards.
  - Encourage adherence with our Human Rights Policy and Supplier Charter, which outline expectations for anti-slavery practices, diversity, safety, and sustainability.
  - Conduct due diligence processes to identify and mitigate modern slavery risks within our supply chain. We aim to continuously improve our approach to ethical procurement.
- Our remediation process includes the following actions:
  - If we identify potential modern slavery concerns within our operations or supply chain, we take immediate action to address them. This may involve working with the supplier to implement corrective measures or terminating the business relationship.
  - We are committed to transparency and will report on any identified instances of modern slavery and the actions taken in our future modern slavery statements.



# Westgold Group – Future Actions

## Reporting Criteria #5 – Address the effectiveness of future actions

- The Westgold Group actively implements measures to prevent modern slavery throughout our operations and supply chain. To assess the effectiveness of these actions, we continuously monitor and evaluate the following aspects:
  - We regularly review internal decision-making processes to confirm consistent consideration of human rights principles. This helps us identify areas where integration can be further strengthened.
  - We monitor enforcement actions taken for Supplier Charter violations. By analysing these actions, we can identify areas for improvement in the enforcement system.
  - We track the number of suppliers successfully onboarded through the virtual platform and monitor any non-compliance instances identified during onboarding. This allows us to assess the platform's effectiveness in promoting ethical practices.
  - We review the effectiveness of our supplier assessment process in identifying potential risks and ensuring alignment with our values. This evaluation helps us refine our assessment methods for stronger risk mitigation.
  - We analyse how consideration of supplier modern slavery statements has impacted our procurement decisions and its effectiveness in identifying ethical suppliers. This analysis helps us determine if this factor strengthens our ethical sourcing practices.
  - We track the volume and nature of concerns raised through our reporting channels. This allows us to identify trends and areas requiring further action, ensuring our reporting system remains effective in capturing potential issues.
- By continually evaluating these factors, Westgold gains valuable insights into the effectiveness of our anti-slavery efforts and identifies opportunities for ongoing improvement.

# Westgold Group – Subsidiaries

Reporting Criteria #6 – Describe how the reporting entity consulted on its Statement with subsidiary entities

- The assessment of modern slavery risks involved engagement across the Westgold Group with key stakeholders and executive management.
- Each reporting entity within the Westgold Group was consulted and provided feedback in relation to this Statement.
- Westgold is committed to ongoing engagement with various stakeholders:
  - **Employees:** We encourage employees to report any potential human rights concerns through our confidential reporting channels.
  - **Suppliers:** We engage with suppliers through communication channels established for the Supplier Charter. This allows for ongoing dialogue and clarification of expectations regarding ethical practices.
  - **Industry Stakeholders:** Westgold is open to collaboration with industry organisations and initiatives focused on combating modern slavery.

# Westgold Group – Executive Approval

The Westgold Group Modern Slavery Statement was approved by the board of Westgold Resources Limited on 24 April 2024.



Signed: Hon. Cheryl Edwardes AM

Chair