



MODERN SLAVERY STATEMENT

Approved: Date 5/12/25

1. Introduction

This is Ora Banda Mining Limited's ("Ora Banda or the Company) first Modern Slavery Statement made under the Modern Slavery Act 2018 (Cth) (Act) and relates to the period 1 July 2024 to 30 June 2025.

Modern slavery encompasses a range of severe human rights violations, including forced labour, slavery, debt bondage, the worst forms of child labour, forced marriage, deceptive recruitment, and human trafficking. These practices involve the use of coercion, threats, or deception to exploit individuals and deprive them of their freedom—often with devastating consequences for victims' health, safety, and wellbeing.

According to the International Labour Organisation, an estimated 50 million people were living in modern slavery globally in 2021, with forced labour identified as the most widespread form. Vulnerable groups—such as children, undocumented migrants, and people experiencing poverty—are disproportionately affected.

This Statement sets out Ora Banda's position on modern slavery and outlines the actions planned over the year ahead to identify and assess related risks within our operations and supply chains.

Statement from our Managing Director

We are pleased to present Ora Banda's first Modern Slavery Statement as a reporting entity under the *Modern Slavery Act 2018 (Cth)*. This Statement reflects our ongoing efforts to identify, prevent, and address modern slavery risks across our operations and supply chain. We acknowledge the critical importance of transparency and accountability in confronting this global issue, and we are committed to promoting ethical and responsible business practices both in Australia and internationally.

Our commitment to upholding human rights, supporting ethical labour practices, and eliminating modern slavery remains steadfast as we continue to strengthen our extended value chain. Our overarching objective is to ensure that all individuals involved in our operations are treated with fairness, dignity, and respect. We strive to embed the highest standards of ethical conduct into all aspects of our business, creating a foundation for a responsible and sustainable future.

- **Luke Creagh, Managing Director**

2. About Ora Banda

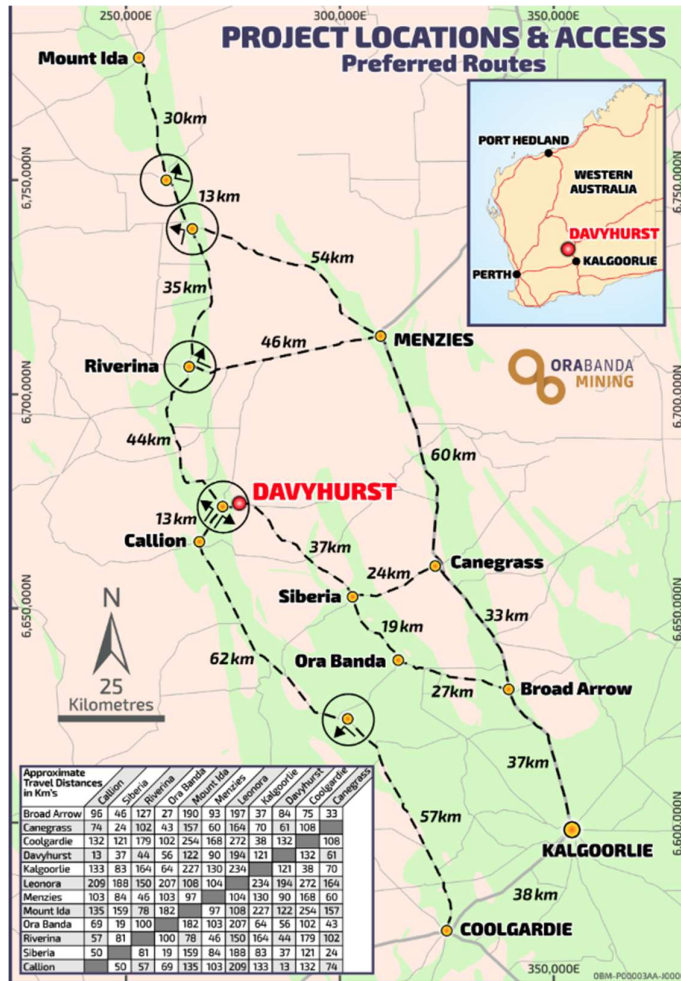
Ora Banda Mining Limited, ABN 69 100 038 266 is an Australian gold exploration and development company. The registered and principal office address is Level 2, 1 Hood Street, Subiaco WA 6008. Ora Banda is listed on the Australian Securities Exchange under the trading code OBM.

The Company focuses on the operation and expansion of gold mining at Davyhurst, which includes the Riverina, Sand King, and Waihi deposits, along with other prospective targets for nickel, copper, and lithium. Ora Banda operates a 1.2 million tonne per annum processing hub at Davyhurst to process its mined gold.

The principal activities of the Company during the financial year were mineral exploration, mining and processing gold in Western Australia. Ora Banda is the 100 percent owner of the Davyhurst Gold Project which is located approximately 120 km north-west of Kalgoorlie, within the Tier 1 gold mining province of the Eastern Goldfields.

This Davyhurst Gold Project consists of six key project hubs which collectively cover an area of approximately 1,160 km², extending 140km from north to south (refer Figure 1 below). The tenement package is highly prospective and covers the convergence of two regionally significant deep-seated structures known as the Zuleika Shear and the Ida Fault.

Figure 1: Ora Banda's Davyhurst Gold Project



Governance Framework

Ora Banda is governed by a Board of Directors who are appointed in accordance with its Constitution. The Board is responsible for ensuring that Ora Banda has an appropriate corporate governance structure and continues to grow and develop for the advancement of the mining industry and in line with its Corporate Governance Manual.

At Ora Banda, our Board, executives and employees are committed to upholding the highest standards of corporate governance. We view strong governance as essential not only to effective business strategy but also to the responsible management of modern slavery and broader human rights risks.

Our governance framework clearly defines the roles of our Board, management, and staff in identifying and engaging stakeholders impacted by our operations. It also ensures that communication with stakeholders is timely, transparent, accurate, and effective.

In line with our commitment to ethical and sustainable business practices, we have taken proactive steps to address modern slavery risks across our operations and supply chains.

Recognising the global significance of this issue, we have engaged leading experts in modern slavery and human rights to guide our approach, raise awareness, and build internal capability.

This collaboration enables Ora Banda to identify, assess and mitigate potential modern slavery risks through robust policies, ongoing supplier assessments, and improved due diligence processes. By embedding these measures into our governance systems, we aim to foster a culture of ethical conduct, transparency, and accountability.

Through these efforts, we are building a more sustainable and socially responsible business—one that aligns with both national legislation and international best practices, while actively contributing to the elimination of modern slavery in our industry and beyond.

Our Supply Chain

A summary of Ora Banda’s FY25 supply chain is provided below:

Total Procurement Spend	\$218M
Total Procurement Categories	166
No. of Supplier Countries	3 including Netherlands, United States and Australia
Total Suppliers	368
Largest Single Category Spend	Mining Machinery and Equipment
Top Spend Categories	Logistics, Supply of Fuel Oil, Drilling Services

Ora Banda’s FY25 procurement spend was \$218 million with 368 direct (Tier 1) suppliers across 166 goods and services categories.

Our procurement categories include mining machinery and equipment, logistics, supply of fuel oil and drilling services.

3. Modern Slavery Risk in Ora Banda’s Operations and Supply Chains

In the first reporting year the Company focussed on understanding its direct supplier risks (Tier 1) and the operational processes in place to manage those risks. Ora Banda engaged external expertise to assist in documenting, assessing, and prioritising our direct suppliers.

A review of Ora Banda accounts payable data and categorisation of the spend facilitated an assessment based on the following risk factors:

- **Sector and industry risks:** Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes. For example, mining, textiles and fashion, fishing, electronics, cleaning, and agriculture are recognised as high-risk industries globally.
- **Product and services risks:** Certain products and services may have high modern slavery risks because of the way they are produced, provided or used. For example, bricks, cobalt, cotton and rubber are recognised as high-risk products globally.

Similarly, services that involve lower wages, manual labour, casual/seasonal workers or low qualification, such as cleaning may have high modern slavery risks.

- **Geographic risks:** Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.

Based on these criteria Ora Banda assesses that its product suppliers are more likely than service providers to present a Modern Slavery risk. These are typically large businesses with extensive and complex upstream supply chains and several of them have multiple production facilities in different countries.

Direct Supplier Assessment - 92% of Ora Banda's direct suppliers fall within a low-risk category, while the remaining 8% are assessed as medium risk. This distribution reflects the fact that all assessed suppliers are based in low-risk countries. The majority are Australian based, with one in Netherlands and one in the United States. These jurisdictions have strong labour protections.

Indirect Supplier Assessment - A total of 65 indirect suppliers, representing 18% of Ora Banda's assessed supply chain, have been classified as high risk based on their category risk axis. Key areas of expenditure include vehicle manufacturing and parts, construction-related services, labour hire, accommodation, industrial chemicals, and distribution - particularly retail and logistics-related services.

Only 17% of all assessed vendors have published a Modern Slavery Statement, while the remaining 83% have not demonstrated public disclosure of their modern slavery risk management practices.

Given this assessment, going forward Ora Banda will focus on strengthening its understanding of its suppliers' supply chain and raise their awareness of the Modern Slavery issue, together with improving the supplier on-boarding process.

Risk in Operation

Ora Banda's workforce comprises a mix of directly employed or contracted professional, technical, and skilled workers in Australia. Given the strong regulatory environment in the mining sector, we consider the risk of modern slavery to be low within our direct business operations. Moreover, as articulated in current policies and procedures, we currently track the health and well-being of all personnel who service our mining locations, including psycho-social safety.

4. Actions Taken

In FY25, Ora Banda commenced its modern slavery due diligence program with the following objectives:

- mapping and categorising our direct suppliers to assess the inherent risks of modern slavery;
- conducting a residual risk assessment through issuing a self-assessment questionnaire to suppliers in the high-risk categories; and

- developing a modern slavery statement and roadmap for establishing meaningful actions to combat the issue.

Moving forward, Ora Banda is committed to building on these insights by enhancing data collection on supply chain risks and strengthening its supplier engagement efforts. Future assessments will prioritise a deeper understanding of modern slavery risks across all suppliers, ensuring more comprehensive mitigation strategies throughout its extended supply chain.

Employment Practices and Labour Standards

As part of the offer of employment, prospective Ora Banda employees receive a written contract of employment along with Fair Work Information Statement(s) from the Fair Work Ombudsman applicable for the type of employment arrangements. These statements provide information on employee entitlements and protections in Australia including the National Employment Standards, casual work, fixed term contracts and general protections in the workplace. All Australian employers must give this document(s) to new employees when they start work, including employees' engaged by Ora Banda's contractors.

When employed at Ora Banda, employees are covered by Australia's employment laws that provide strong protections for workers and reduce the risk of modern slavery practices. Ora Banda's recruitment processes include clear role descriptions, employment contracts, and verification of work rights. Annual remuneration and performance reviews are conducted to align employee compensation with industry benchmarks, which helps support fair working conditions. Ora Banda has in place a Respect@OBM program which includes workplace policies designed to create an inclusive, respectful and equitable work culture and minimise the risk of inappropriate and unreasonable conduct, bullying, harassment, discrimination, victimisation or violence. In addition, Ora Banda has in place a comprehensive anonymous whistleblower program to allow all stakeholders to raise concerns of improper conduct or illegal activities.

Improvement Road Map

In 2026, the Company has committed to a Modern Slavery action plan which will include:

- review and development of a policy to ensure alignment with the UN Guiding Principles of Business and Human Rights;
- conduct enterprise-wide awareness training on the issue of modern slavery and Ora Banda's approach to managing risk;
- develop a grievance policy and mechanism; and
- develop a framework to assess the effectiveness of actions taken to address modern slavery.

5. Assessing Effectiveness

Our effectiveness review process includes measures taken to develop internal capabilities and iteratively improve our systems and processes on a continuous basis. As we implement

our Modern Slavery Action Plan, we will also develop a framework for assessing the effectiveness of our actions against quantitative and qualitative indicators based on these core activities:

- governance and due diligence;
- risk management;
- procurement and supply chain;
- human resources, training and recruitment; and
- grievance and reporting.

6. Consultation Process

This is a joint statement by Ora Banda and all of its wholly own subsidiaries (together the Ora Banda Group) in accordance with section 14(2)(d)(ii) of the Act.

We have prepared this Statement in consultation with each of the following entities that this Statement covers, in accordance with section 14(2)(c) of the Act.

- (a) Ora Banda Mining Limited (ACN 100 038 266), the Ora Banda Group's parent company;
- (b) Siberia Mining Corporation Pty Ltd (ACN 097 650 194), which owns the Sand King mine; and
- (c) Carnegie Gold Pty Ltd (ACN 117 116 097), which owns the Davyhurst plant and the Riverina mine.

7. Other Relevant Information

At Ora Banda, we recognise the urgent environmental challenges facing our planet and embrace our responsibility to contribute to its protection and preservation.

This year Ora Banda committed to building a strong foundation that integrates environmental, social, and governance ('ESG') principles across our operations as we continue to grow our sustainability systems and integrating key areas such as health and safety.

To support our efforts and guide our approach, Ora Banda engages third-party consultants with deep expertise in sustainability and ESG. These partnerships help ensure our strategies are informed by best practice, aligned with evolving standards, and tailored to our operational context.

Beyond internal systems development, Ora Banda is committed to sustainability through action-oriented initiatives that deliver real outcomes. Our work includes advancing rehabilitation programs across our sites, partnering with local companies and communities to create shared value, and implementing water conservation strategies to safeguard this critical resource. These efforts are supported by broader ESG programs and collaborations with NGOs, industry bodies, and government agencies. Through these partnerships, the Company aims to enhance its environmental and social performance.

While developing robust sustainability systems continues, our goals are clear: to operate responsibly, minimise our environmental footprint, and promote a workplace culture and environment that supports the health, safety and well-being of our people.

Our ESG achievements can be found in our *2025 Annual Report: Sustainability Update*

Modern Slavery Act 2018 (Cth) – Statement Annexure

Principal Governing Body Approval

This modern slavery statement was approved by the Ora Banda Board of Directors on 2/12/2025.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Ora Banda as defined by the Act:



Luke Creagh
Managing Director

Mandatory Criteria

Below table outlines the page number/s of our statement that addresses each of the mandatory criteria in section 16 of the Act.

Section of the Modern Slavery Act 2018 (Cth)	Mandatory criteria	Page number
16(1)(a)	Identify the reporting entity	1
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity.	2-4
16(1)(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4-5
16(1)(d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	5-6
16(1)(e)	Describe how the reporting entity assesses the effectiveness of these actions.	6-7
16(1)(f)	Describe the process of consultation with: (i) any entities the reporting entity owns or controls (ii) in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement.	7
16(1)(g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	7-8