



2023 Modern Slavery  
Statement

## 2023 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 2022 to 30 June 2023.

### **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 8 December 2023 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 FY23 Annual Report and FY23 Corporate Governance Statement, which are available at [www.rameliusresources.com.au](http://www.rameliusresources.com.au).

Modern slavery risks and impacts have not been assessed in jurisdictions where Ramelius does not actively undertake exploration or production operations, including Cote D'Ivoire and Guinea where the registration of subsidiary entities commenced but was not completed (entities are legacy items arising from recent takeover activity). While Ramelius may still have had a presence in these jurisdictions in 2023, for example, for the purposes of progressing the dissolution of such entities, Ramelius has never, and did not have any exploration or production operations in these jurisdictions.

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 our fourth Modern Slavery Statement of Ramelius Resources Ltd and its consolidated subsidiaries (together **Ramelius**) for the reporting period of 1 July 2022 to 30 June 2023 under the *Modern Slavery Act 2018* (Cth) (**Act**).

Ramelius' mission is to be a sustainable gold producer that focuses on delivering superior returns for stakeholders. This includes the identification and eradication of potential modern slavery risks in our supply chain and operations.

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.

At Ramelius, a core value is being authentic by displaying moral and ethical behaviour at all times. This extends to acting in good faith and engaging in lawful and ethical business practices in all our dealings. Tackling modern slavery and respecting human rights are inexorably linked to these behaviours.

This statement summarises actions undertaken by Ramelius in FY23 to assess, identify and mitigate the risks of modern slavery in our operations and supply chain, and provides an update on our efforts going forward (notably to enhance our engagement with our suppliers).

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.



Mark Zeptner  
Managing Director  
Ramelius Resources Limited

## Ramelius' structure, operations and supply chain

### About Ramelius

Ramelius Resources Ltd is an Australian public company (ACN 001 717 540) with its registered office at Level 1, 130 Royal Street, East Perth WA 6004. It is a leading Western Australian mid-tier gold producer. We are listed on the Australian Securities Exchange (**ASX**) and included in its S&P/ASX 200 index under the code "RMS". We were incorporated in 1979, listed on the ASX in 2003 and have been in production since 2006.

At the end of FY23, Ramelius had approximately 310 employees and 550 contractors (further information about our workforce can be found in our 2023 Sustainability Report available on our webpage: <https://www.rameliusresources.com.au/>).

Ramelius and its subsidiaries (please see our 2023 Annual Report for a full list, all of which are wholly owned) are engaged in the exploration, mine development, and production and sale of gold in Australia. The subsidiaries all operate under the direction and governance of Ramelius. The directors for the majority of the subsidiaries are the Chief Executive Officer and Chair of Ramelius.

Ramelius is committed to being a sustainable gold producer. We seek to integrate respect for human rights into the way we operate to continuously improve our operations.

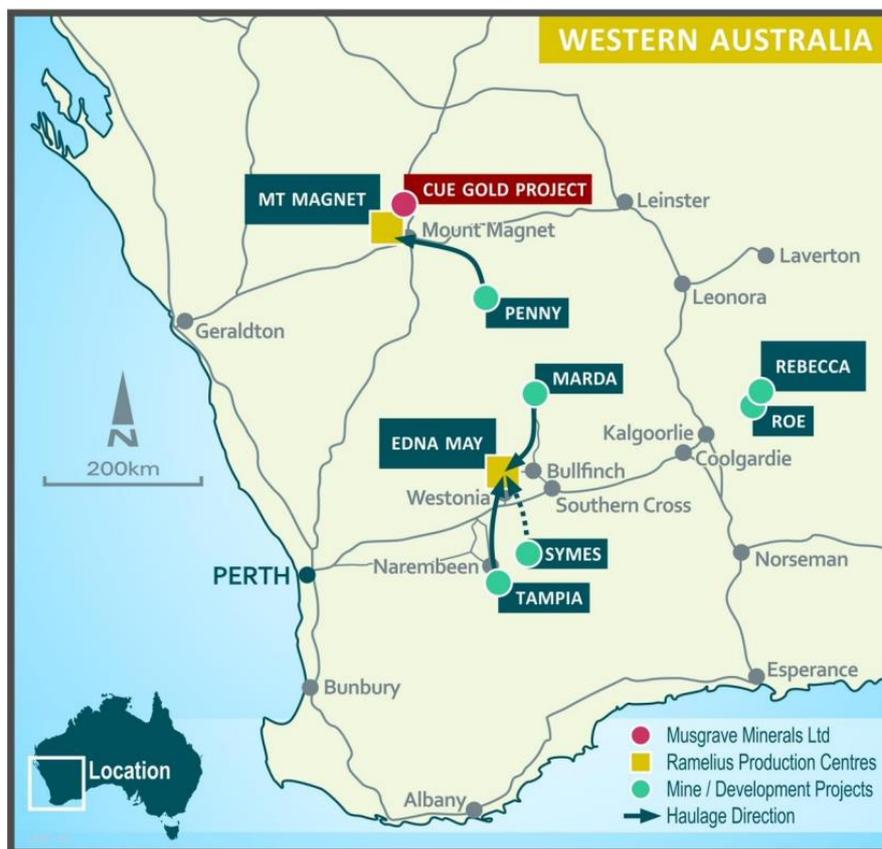
Ramelius has processing centres at Mt Magnet and Edna May and operates five gold mines with ore from the Penny Gold Mine being hauled to, and processed at, Mt Magnet and ore from the Marda and Symes Gold Mines being hauled to, and processed at, Edna May (see map on next page).

In addition to this Ramelius has exploration projects throughout Western Australia, notably the Rebecca and Roe Gold Projects located approximately 145km and 100km east of Kalgoorlie respectively.

Ramelius produced 240,996 ounces of gold in the 2023 financial year at an All-in Sustaining Cost (AISC) of A\$1,895 per ounce. Guidance for the 2024 financial year is for gold production of 250,000 to 275,000 ounces at an AISC of A\$1,550 – 1,750 per ounce.

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 2023 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:

- We **Empower** our people
- We achieve **Fit-for-Purpose** outcomes
- We **Deliver** and do it Safely
- We are **Authentic**

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

## Our Strategic Priorities

- Feed Existing Hubs
- Acquire Third Hub
- Ramp Up Greenfields
- Grow Capability
- Do the Essentials

## Sustainability at Ramelius

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.

## Sustainability Pillars

Our Business	<ul style="list-style-type: none"> <li>• Organisational Governance</li> <li>• Economic Performance</li> <li>• Regulatory and Compliance</li> <li>• Information Technology</li> <li>• Innovation</li> </ul>
Our People	<ul style="list-style-type: none"> <li>• Health, Safety and Wellbeing</li> <li>• Employment and Contractors</li> <li>• Talent Attraction, Development and Retention</li> <li>• Ethics and Human Rights</li> <li>• Diversity</li> </ul>
Our Communities	<ul style="list-style-type: none"> <li>• First Nations Peoples and Native Title</li> <li>• Taxes, Supplier Payments &amp; Royalties</li> <li>• Community Investment and Engagement</li> </ul>
Our Environment	<ul style="list-style-type: none"> <li>• Water and Wastewater Management</li> <li>• Greenhouse Gas Emissions and Energy</li> <li>• Waste and Tailings Management</li> <li>• Mine Closure and Rehabilitation</li> <li>• Biodiversity</li> </ul>

We report in alignment with the Sustainability Accounting Standards Board’s Metals and Mining Industry Standard framework and have captured key indicators recommended by the Global Reporting Initiative.

We have continually enhanced our sustainability progress by expanding our governance policies and procedures and embedding sustainable values into our business strategy. With a firm foundation in place, we believe we are now entering a stage of mature sustainability reporting that will continue to highlight our performance in all Environmental, Social, and Governance (ESG) areas.

We monitor our sustainability performance by participating in ESG benchmarking assessments such as S&P’s Corporate Sustainability Assessment and global rating agencies MSCI and Sustainalytics. Significant improvements in our recent S&P and Sustainalytics ratings reflects our ongoing improvement.

Led by Non-Executive Director Natalia Streltsova, the Company’s Risk & Sustainability Committee continues to work alongside the Board in overseeing risk, governance, and sustainability issues such as climate change.

In FY23 the Risk & Sustainability Committee oversaw the development and execution of a Climate Scenario Analysis as part of Ramelius’ continued alignment with the Taskforce on Climate-Related Financial Disclosures recommendations. In parallel we initiated the process to calculate our Scope 3 Greenhouse Gas emissions. This reflects our commitment to improve our understanding and management of our environmental impacts.

Our ongoing sponsorships and engagements ensure that we give back to communities in which we operate, strengthening our relationship with local stakeholders. We strive to provide benefits to our communities well beyond the life of our mines.

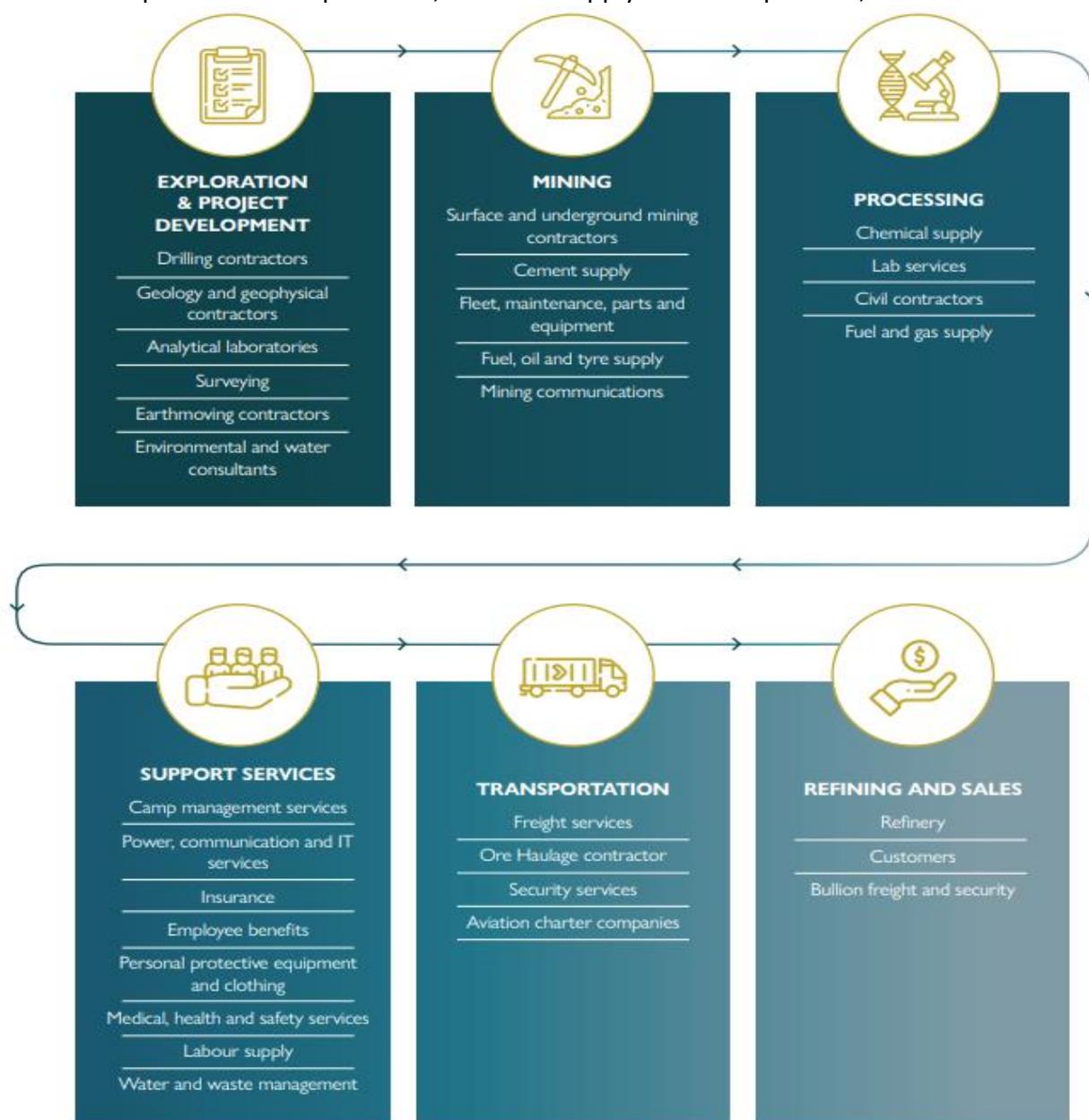
## Our supply chain

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 \$0.2M (mostly in Canada and the US) we acquired \$497M 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.

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. The potential for modern slavery in our business is low as our offices, operations and suppliers during FY23 were Australian-based and thus subject to a strong regulatory environment. The most relevant risk areas within our supply chains with potential for modern slavery practices to exist for our operations are First Nations peoples and communities in which we operate, procurement of certain goods (part of which may be sourced overseas e.g., Personal Protective Equipment) and services (e.g., catering) and labour conditions. All gold 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 \$0.2M on mostly North American suppliers, all of our goods and services (worth \$497M) 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, other training and qualification programs. At Ramelius, our recruitment processes and practices ensure that the engagement of potential employees is undertaken ethically and on a non-discriminatory basis. Our processes include the requirement for all candidates to possess and demonstrate their right to work lawfully in Australia.

In addition to the inclusion of modern slavery provisions in our contracts (which permit us to escalate or terminate contracts where appropriate or required) we require all suppliers to complete a questionnaire regarding modern slavery risk. If any concerns are identified in the questionnaire, they must be discussed and resolved prior to any decision to engage the potential supplier. Going forward we aim to further address the potential risks in this area through collaborating with peers, participating in industry groups and reviewing our due diligence processes.

Complementing the legislative regime, Ramelius regularly reviews and updates its policies (such as our Code of Conduct, First Nations Peoples, Diversity & Inclusion, Whistleblower 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.

The Board is responsible for setting the Company's purpose and values, strategic direction and policies, including in relation to sustainability. 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 executive management team.

We follow the fourth edition of 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. We are focused on aligning our environmental, social and governance policies and activities across our operations in accordance with the UN Sustainable Development Goals (SDGs). These are considered the blueprint to achieving a better and more sustainable future for all and as such represent a major inspiration for the future prosperity of our stakeholders.

We continue to report against the 9 SDGs that most align to our business strategy and stakeholder priorities. Throughout this report, we utilise the relevant SDG icons to highlight where our activities contribute progress towards achieving the SDG goals and targets.

In addition to the SDGs, we are participants of the UN's Global Compact and its Ten Principles in the areas of human rights, labour, environment, and anti-corruption. We will continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations, and report progress annually to the UN.

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

The Risk & Sustainability Committee's Charter, along with other relevant documents, is found on our webpage. In the context of modern slavery and human rights, the Committee also has oversight of the following policies, 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, directors 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. All Ramelius employees, including independent contractors who operate for or on behalf of Ramelius, are expected to

uphold the standards outlined in our Code of Conduct Policy. As a condition of their employment, this mandates that all workers and contractors uphold suitable standards of conduct, ethics, and integrity.

- (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 require potential suppliers to complete relevant questionnaires and include modern slavery clauses in our standard contracts.
  
- (c) Our Anti-Bribery and Corruption Policy strictly prohibits activities involving bribery, corruption, unauthorised payments or exercising improper influence by all employees and contractors, and requires compliance with applicable laws wherever we conduct business. The policy ensures that all employees behave honestly and follow the laws and ethical standards of our company across all of our operations. Conduct that is unethical, dishonest, or corrupt is not permitted. To prevent, detect, and respond to acts that involve or could entail unethical practise such as bribery, and/or corruption, we are committed to mitigating risks and maintaining controls. Employees of Ramelius who are discovered to have committed an act of corruption or bribery shall face disciplinary action. The policy also ensures that we only conduct business with partners who also engage in ethical and lawful practices. In FY23 there were no cases of bribery or corruption recorded.
  
- (d) Our First Nations 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 First Nations Peoples Policy, we work with First Nation representatives to improve communication and better understand the views and beliefs of the First Nations 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 Fist Nations communities. We are committed to taking appropriate steps to identify and reduce the effects of any unforeseen impacts from its activities on First Nations communities, land, culture, traditions and cultural sites.

<b>CODE OF CONDUCT POLICY EXPECTATIONS</b>
• Honesty and fairness in all dealings with stakeholders, co-workers, management, and the public
• Respect for our equipment, supplies and property
• Zero tolerance for discrimination, harassment, or offensive language and/or behaviour in the workplace
• Adherence to appropriate Professional Codes of Practice and/or ethics
• Zero tolerance for postings on any social media platform material that could reasonably be deemed inappropriate or unlawful

Ramelius' whistleblower program (which includes the services of an independent third party) is in place to receive any concerns (anonymously if desired) about any questionable conduct or practice, arising in relation to, among other things, behaviour contemplated by these policies.

### **Suppliers**

At Ramelius, we expect that our suppliers act in an ethical and responsible manner as a condition of conducting business with us. This is enforced via our standard Terms and Conditions which sets out the minimum requirements we expect from our supply chain partners. 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.

We assess the potential for modern slavery risks within our supply chain by engaging with suppliers during the screening process. This formal and informal contact, which includes the completion of a specific modern slavery risk questionnaire by our suppliers, allows us to consider all aspects of a supplier's business and to identify matters that may need further attention or remediation.

The potential for modern slavery in our business is considered low as our offices, operations, and suppliers during FY23 were Australian-based and therefore subject to a strong regulatory environment. The most relevant risk areas within our supply chains with potential for modern slavery practices to exist are First Nations peoples and remote communities in which we operate, procurement of certain goods and services (part of which may be sourced overseas), and labour conditions. Recognising the potential risk of modern slavery across these business relationships, we also intend to engage further with these suppliers.

All personnel, whether Ramelius or contractor-engaged, are subject to Australian employment law and undertake various induction, other training, and qualification programs. We are also guided by the UN Guiding Principles on Business and Human Rights.

In FY24 we plan to develop a standalone Supplier Code of Conduct that will align with our Company values and legal requirements. This will include a formalised supplier checklist for contracting that will capture a wider range of ESG criteria, such as engagement regarding climate change risks and opportunities.

We do not audit suppliers in relation to modern slavery risks, but this may change as we continue to mature our supply chain approach.

### **Employment and operational practices**

Recruitment processes ensure ethical and non-discriminatory engagement of potential employees including the requirement to demonstrate their right to work lawfully in Australia. Where required, international recruitment is supported by external migration agents.

At our operations, hours worked are monitored and all accommodation provided is safe and compliant with industry standards.

### **Risk management**

Risk management at Ramelius is overseen by our Board of Directors. All of our Board members are highly experienced in the oversight, management and mitigation of critical business risks. The Board, Audit and Risk & Sustainability Committees, and Executive Team regularly review the risk portfolio of the business and the effective management of risks.

Our risk and control framework, Ramelius Essentials, provides the foundation for empowering our people to perform by ensuring that we do the fundamental things well. The Essentials Program focuses on integrating our approach to managing the fundamental requirements for our business which are to:

1. maintain and apply good standard practices for controlling our activities;
2. understand and effectively manage key risks across our business;
3. learn, share, and take action from these learnings;
4. comply with the requirements of laws impacting our business;
5. maintain a safe system of work;
6. operate in accordance with industry sustainability principles;
7. remain resilient in the face of adverse and extreme events; and
8. constantly monitor and review our activities and performance.

Risk registers are held for each of our sites as well as the corporate office and are managed by the respective work group with oversight provided by our Health and Safety Managers. A risk manager's responsibility is to coordinate the development and maintenance of registers of material risks and opportunities. They must monitor control and improvement activities, as well as report to key stakeholders on material risks. 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. Climate-related risks and relevant ESG risks and opportunities are also incorporated into the sustainability risk register.

Further information on risk management can be found in the Risk & Sustainability Committee Charter and Risk Management Policy on our website.

### **Whistleblowing**

To enable all directors, employees, potential employees, contractors, consultants, and external stakeholders to raise concerns with the option to remain anonymous, we have in place an external whistleblower platform through YourCall.

We have in place company-wide training on our Whistleblower Policy and procedures. The training strives to ensure that every employee and contractor is aware of the Whistleblower Policy and knows how to report any improper, unethical, or unlawful behaviour. This is in accordance with the extended legal rights and protections for whistleblowers provided by the *Corporations Act 2001* (Cth), which is overseen by the Australian Securities & Investments Commission. Our Whistleblower Policy is available on our website.

Our Incident Reporting and Investigation Procedure outlines the process involved in incident reporting and the investigation requirements for all incidents for Ramelius and our subsidiaries.

This procedure aims to ensure all actions from incident reporting and investigations are captured and managed. This procedure is based on legislative, company and site requirements.

All personnel received training on acceptable workplace behaviour and the whistleblower policy and procedures, and are able to report concerns (anonymously if they wish) about any questionable conduct or practice, without the risk of penalty or retribution to themselves or others.

No reports were received pursuant to the whistleblower program in FY23, including no reports of suspected instances of modern slavery practices affecting Ramelius.

Our *Diversity & Inclusion Policy* 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 policy and Code set out the procedures to address grievances and complaints including those relating to discrimination, harassment and bullying.

Going forward, we continue to undertake efforts to raise awareness regarding behaviour and the reporting regime among employees and contractors.

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

We undertake regular reviews of our risk framework to assess its effectiveness in identifying, managing and mitigating risk, to consider the appropriateness of the risk appetite adopted to achieve the Company's strategic goals and to gauge the maturity of our Ramelius Essentials Program.

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

In relation to modern slavery, key elements of our approach include:

- a strong governance framework to identify and remedy potential modern slavery vulnerability. Effectiveness of policies, procedures and training can be assessed having regard to reported codes breaches (none in FY23).
- effective assessment and reporting of modern slavery risks across our supply chain, including through early due diligence activities and remedial actions where appropriate (none in FY23).
- training and reporting regimes for personnel (including suppliers) that comprises expectations regarding behaviour and ethics and awareness regarding the means to report any concerns regarding the same. We can assess the effectiveness having regard to induction and training completion rates and the number of reported breaches (none in FY23).

Despite capacity and resourcing limitations that arose in FY23, going forward, we are committed to a process of continuous improvement, including:

- reviewing the risk of modern slavery when carrying out our annual risk management process;
- considering the engagement of external advisors to undertake an independent gap analysis of our policies and practices (including in relation to suppliers);
- reviewing and improving our due diligence and supplier engagement systems; and
- benchmarking our approach against our peer companies and liaising with peers and peak bodies to identify best-practice approaches.

### **Next Steps**

Priorities for FY24 include completing the implementation of previous initiatives (bolstered by expanded resources) including engagement with our suppliers (including assessments) and our workforce, including by:

- developing and implementing a supplier code of conduct;
- undertaking additional specific training for Ramelius employees who are involved with human resource and procurement activities;
- reviewing the questionnaire provided to suppliers (including pursuant to a working group comprised of peers) and considering whether any revisions are required; and
- engaging with our largest and other select suppliers in our identified risk sectors to further our understanding of their operations and supply chains.

### **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 2023 Annual Report which is available on our website.

The subsidiaries enter contracts, hold licences and permits. They operate under the governance of Ramelius and share the same executive management. The directors for the majority of the subsidiaries are the Managing Director/Chief Executive Officer and Chair of Ramelius.

Through its Ramelius Essentials program, Ramelius has processes that involves regular engagement with stakeholders on key risks and their management, including compliance.

The preparation of this Statement was overseen by our Company Secretary & EGM – Legal/HR/Risk/Sustainability with input from a number of sources including contracts and procurement, legal, risk, environment and governance.

Through these processes, Ramelius consulted its owned and controlled entities in developing this statement.