



GOLD FIELDS

MODERN SLAVERY STATEMENT

for reporting period

JANUARY – DECEMBER 2023



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What this modern slavery statement covers

Mandatory criteria	Page numbers
Identify the reporting entity	2
Describe the reporting entity’s structure, operations and supply chains	2, 4, 5, 7, 9
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	9, 12
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	13 – 23
Describe how the reporting entity assesses the effectiveness of these actions	23
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	2
Any other information that the reporting entity considers relevant	20 – 22





Reporting entities

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth), and covers the period 1 January 2023 to 31 December 2023. It is the fourth statement made by Gold Fields Australia Pty Ltd (Gold Fields) on behalf of the following Reporting Entities:

ENTITY	OPERATION	ABN
Agnew Gold Mining Company Pty Ltd	Owner and operator of the Agnew gold mine	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	50% owner of the Gruyere gold mine (a joint venture with Gold Road Resources)	11 615 729 005
Gruyere Management Pty Ltd	Operator of the Gruyere gold mine	33 615 728 795
GSM Holding Company Pty Ltd		91 165 234 051
GSM Mining Company Pty Ltd	Owner and operator of the Granny Smith gold mine	42 165 235 030
St Ives Holding Company Pty Ltd		97 165 234 515
St Ives Gold Mining Company Pty Ltd	Owner and operator of the St Ives gold mine	44 098 386 273

This Statement sets out the actions taken by Gold Fields since filing its first statement in 2021 to further identify, mitigate, and manage the risks of modern slavery within our Australian operations and supply chain. It addresses each of the mandatory reporting criteria set out in the Modern Slavery Act.

Consultation and approval

Gold Fields developed this joint statement in consultation with each Reporting Entity listed above. The boards of directors of all the Reporting Entities comprise a small number of common officeholders who are members of the Gold Fields Regional Leadership Team. By virtue of their senior positions, the officeholders of these companies have a thorough understanding of Gold Fields' businesses, operations and supply chains in Australia across all entities.

This Statement has been approved for release by the Board of Gold Fields Australia Pty Ltd on its behalf and on behalf of each of its related bodies corporate on 27 June 2024.

Graeme Ovens
Vice President: Operations Australasia / Director





Introduction by Gold Fields CEO

The past two decades have seen Gold Fields transition from a South Africa-centric business to a global company driven by sustainably focused growth. We are at a pivotal point in the Gold Fields journey, and a step change is needed to take us into a new era of operating. Our culture transformation journey, the Gold Fields Way, reflects our commitment to fostering a workplace characterised by care, respect and inclusivity.



Now, the imperative is to translate this work into concrete actions that enable a positive culture experienced by all our stakeholders.

Our stakeholder strategy serves as a guiding framework to meaningfully and transparently engage with stakeholders to understand their needs and expectations, facilitating the creation of enduring value. Gold Fields has built strong relationships and dialogue with its host

communities, who are essential to its social licence to operate.

Our stakeholders are integral to our business and we are committed to upholding and respecting their human rights. Our mining activities, including exploration, construction, operations and closure, have the potential to adversely impact our people and members of our host communities. We strive to understand, mitigate and manage our human rights impact in line

with our leading commitment to ESG.

This report provides an overview of the Company's continued focus on its modern slavery obligations, the work that has occurred to date and plans to further our Australian operations' understanding and maturity across this space.

Mike Fraser
Gold Fields CEO





About Gold Fields

Gold Fields is a globally diversified gold producer with nine operating mines across Australia, Peru, Chile, West Africa (including the Asanko Joint Venture), South Africa and a JV project in Canada. Gold Fields announced a proposed joint venture with AngloGold Ashanti in Ghana, where the two companies will combine neighbouring mines into Gold Fields' Tarkwa mine to create the biggest gold mine in Africa. Shortly after, Gold Fields announced another new joint venture with Osisko Mining to develop and operate the Windfall gold project in Canada.

Globally, we have total attributable annual gold-equivalent production of 2.30Moz, proved and probable gold Mineral Reserves of 44.6Moz, measured and indicated gold Mineral Resources of 30.3Moz (excluding Mineral Reserves) and inferred Gold Mineral Resources of 10.2Moz (excluding Mineral Reserves).

Our shares are listed on the Johannesburg Stock Exchange (JSE) and our American depositary shares trade on the New York Exchange (NYSE). Australia operates a portfolio of predominantly low-cost, relatively long-life mines and has a strong pipeline of projects configured to drive Mineral Reserve replacement and life extension. The Gruyere JV,

Granny Smith, St Ives and Agnew gold mines are located in Western Australia.

The Australian mines have continued to see the real benefits of consistent annual investment in extensional and near-mine exploration (US\$56m invested in 2023 and between US\$48m and US\$76m invested per year over the past eight years).





Governance and management approach

Board

- Oversees stakeholder-related strategies and policies, implementation, risks and opportunities
- Oversees remuneration-related strategies and policies
- Engages with Gold Fields' major shareholders on critical investor issues

Board committees

- **SET Committee** – Assists the Board in discharging its oversight responsibilities relating to stakeholder relations, socio-economic development, human rights, ethics, security strategies, policies and performance
- **SHSD Committee** – Monitors all SHSD matters, including programmes and strategic plans
- **Risk Committee** – Responsible for enterprise risk management, including ESG-related risks

Executive committees

- Led by the CEO, who sets the tone for a stakeholder-centric approach
- Develops and implements SET-related strategies, policies and risk management plans
- Continuously reviews and oversees implementation of safety and health-related strategies, policies and programmes, and investigates and applies learnings from all fatal and serious incidents
- Reviews the Company's ESG performance against objectives and key performance indicators (KPIs)

Functional working committees

- **ESG** – Implements ESG strategy and supports and guides the regions to tailor and implement strategies and policies to their requirements
- **Stakeholder Relations** – Continually develops, implements and improves stakeholder engagement strategies
- **Human Resources** – Implements the People Strategy to enable and support the delivery of our business strategy
- **Investor Relations** – Implements the Investor Strategy and communication programme

Purpose-driven strategy for stakeholder value creation

Our strategy – which informs all our business decisions – enables us to create lasting value for all our stakeholders through our mining activities. This strategy was launched in late 2021 and, over this past year, our teams continued to implement and embed its three strategic pillars across the business.

Strategic pillars 1 and 2 drive the stakeholder-specific initiatives of our strategy, which is driven by our purpose: **to create enduring value beyond mining**. Pillar 3 looks at the company’s growth strategy.

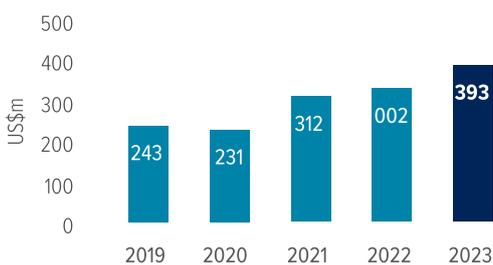
Our stakeholders are integral to our business and we are committed to upholding and respecting their human rights. Our mining activities, including exploration, corporate transactions, construction, operations and closure, have the potential to adversely impact our people and members of our host communities. We strive to understand, mitigate and manage our human rights impact in line with our leading commitment to ESG.

US\$349m
host community
procurement

354
host community suppliers

50
community engagements

Host community value creation in Australia





Alignment with global standards

We are committed to transparent reporting to ensure our stakeholders have sufficient information to assess our performance and understand the challenges and risks we face. As such, we report against the following global reporting frameworks and standards:

- JSE Listings Requirements and NYSE Listings Requirements
- King IV Report on Corporate Governance for South Africa 2016 (King IV)¹
- International Council on Mining and Metals (ICMM) Sustainable Development Framework and Mining Principles
- World Gold Council (WGC)
- Global Reporting Initiative (GRI) Universal Standards
- The United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact (UNGC)
- United Nations Sustainable Development Goals (SDGs)
- Voluntary Principles on Security and Human Rights (VPSHR)
- The 10 principles of the UN Global Compact
- Carbon Disclosure Project (CDP)
- Extraction Industries Transparency Initiative
- International Cyanide Management Code
- Task Force on Climate-related Financial Disclosures (TCFD)

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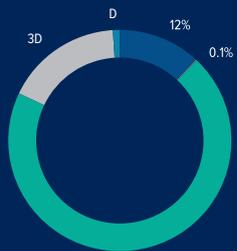


Our operations in Australia

Our mining assets in Australia include a 100% interest in the St Ives, Agnew and Granny Smith mines and a 50:50 joint venture with Gold Road Resources in the Gruyere mine located in the Goldfields region of Western Australia.

Value distribution by stakeholder

2023 total value distribution:
US\$1.4bn



Payments to:

- Employees
- Business partners
- Capital providers
- SED investment
- Governments



Our Australian mines produce over 1Moz of gold annually and are responsible for 44% of the Group's international gold production, with a workforce of 3,774 across four mines and regional offices. We aim to maintain our reputation as a sustainable gold mining company in Australia by demonstrating ethical values, caring for and respecting our host communities – including First Nations peoples – and creating enduring for our stakeholders.

For more on our impact in Australia, refer to the Australia page on our website.

2023 highlights against Group strategy

PILLAR 1

Maximise the potential from our current assets through people and innovation

Improved the lost time injury frequency rate by about 20% to 4.82

Asset optimisation initiatives launched at Granny Smith and St Ives

Collision avoidance systems deployed and tested at our mines

PILLAR 2

Build on our leading commitment to ESG

Respectful Workplaces #listen programme launched across sites and offices

30%^{8A} of procurement spend with host community companies

Board approval for US\$195m St Ives renewable energy microgrid

PILLAR 3

Grow the value and quality of our portfolio of assets

Over US\$60m spent on brownfields exploration

Greenfields exploration boosted through investment in the Edinburgh Park project

US\$25.7 spent on the expansion of the Invincible Complex at St Ives

Gold Fields is Australia's third largest gold producer 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.

Gold Fields' Australian operations contribute approximately 44% of the Group's total gold production and continue to benefit from a sustained program of investment in exploration US\$56m across our Australian mines in 2023.

Gold Fields employs 3,774 people across its four operations in Australia and the Perth corporate office. In 2023, 15% of these people live within host communities, whilst the majority of the workforce work on a fly-in fly-out basis and stay in our accommodation villages due to

the remoteness of the operations. Our St Ives mine has a high proportion of residential workers due to its proximity to the nearby communities of Kambalda and Kalgoorlie.

Our Australian operations were exposed to high regional employment and shortage of accommodation in host communities who already have small or declining populations. Gold Fields continues to offer financial and non-financial benefits to remain competitive in recruiting and retaining talent within our business.



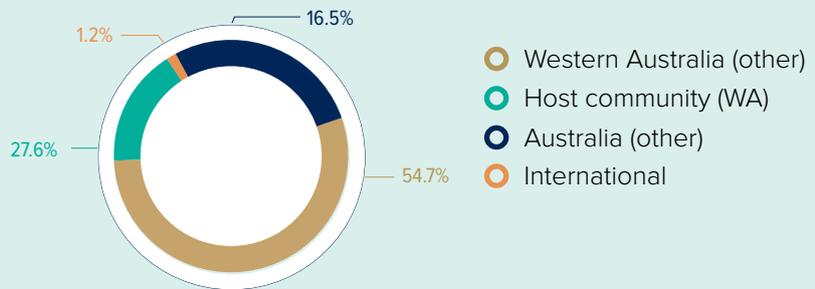
Our supply chains

We depend on a comprehensive network of domestic and international suppliers to procure essential materials for our exploration, development, construction, mining, and processing operations. Our commitment to sourcing locally aims to maximise the economic value generated within the countries where we operate.

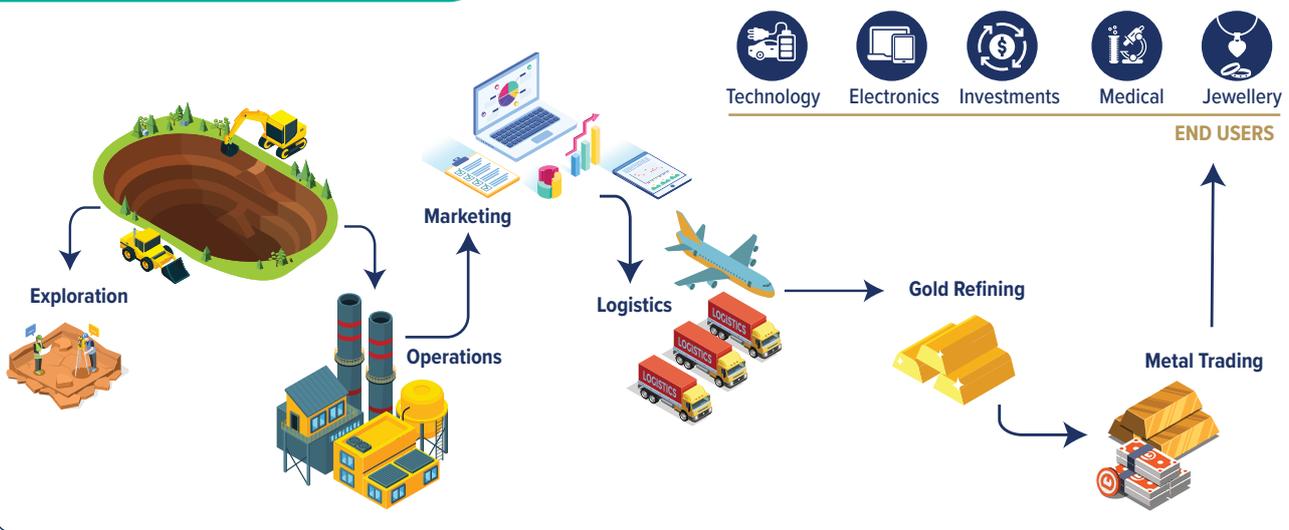
In Australia, 99% of our total procurement expenditure is directed towards in-country suppliers. Notably, over a quarter of this expenditure supports businesses within our host communities, specifically those based in the Eastern Goldfields region of Western Australia. The remaining 1% pertains to highly advanced or specialised supplies directly imported from overseas to meet our stringent operational requirements.

In 2023, Gold Fields managed A\$1.850bn of direct spending for its Australian operations, of which A\$1.8285bn was paid to suppliers within Australia and A\$21.5m to overseas suppliers.

Supply chain spend breakdown (%) – 2023



Overview of our value chain





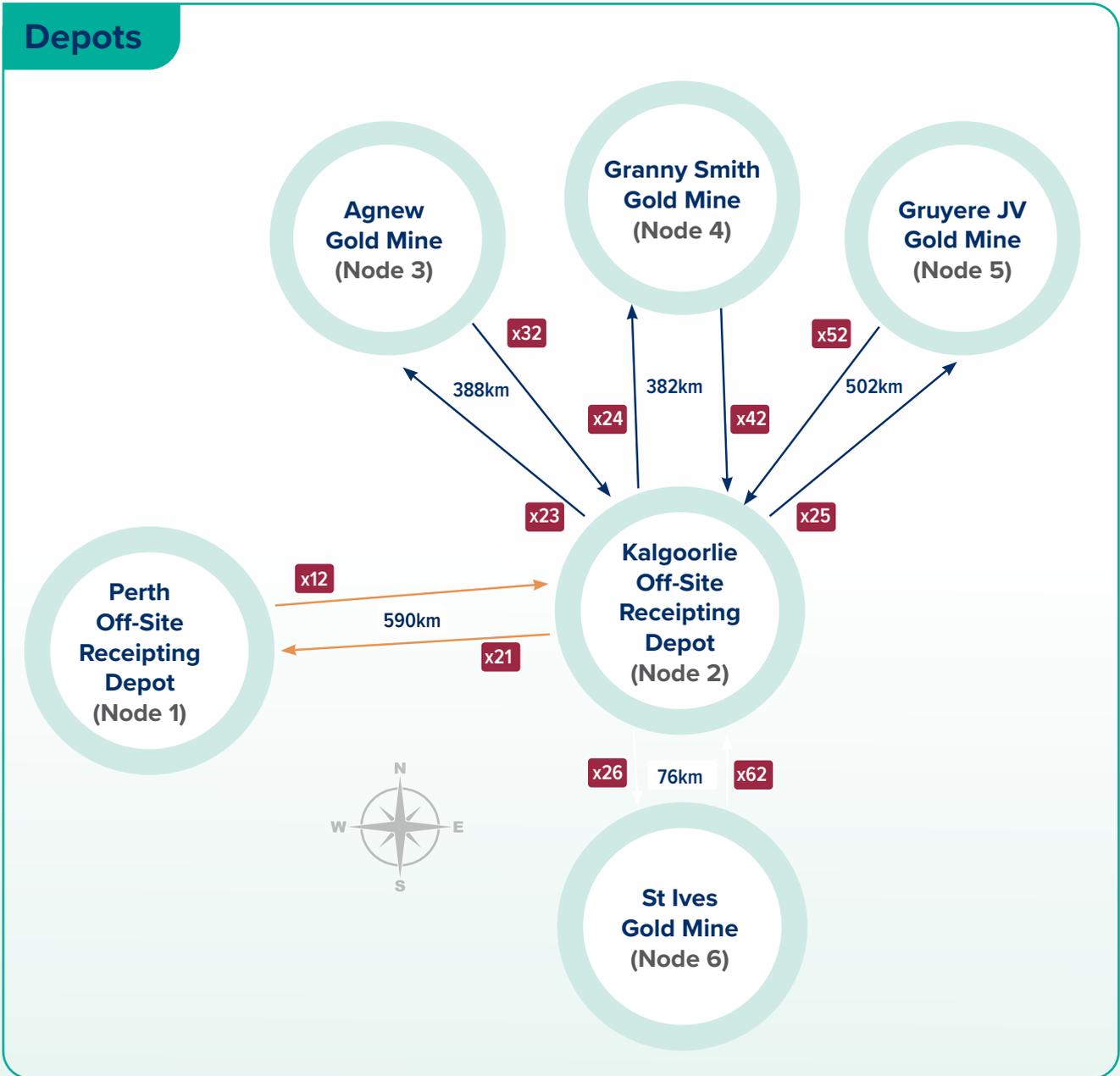
Global Supply Chain

Commodity / service	Country / region of origin	Spend (A\$)	# Vendors
Chemicals and reagents	Australia	\$63M	51
Electrical and Instrumentation	China, Japan, Europe	\$2.4M	93
Bulk and packaged explosives	Australia	\$7.3M	4
Fixed plant and components	Europe, Asia, USA, Australia	\$63.8M	507
Fixed plant services	Australia	\$50.2M	354
Fixed plant maintenance services	Australia	\$50.3 M	316
Freight	Australia	\$44M	121
Diesel, petrol, LPG	Asia, Australia	\$82.7M	4
General equipment hire	Australia	\$42.7M	126
Grinding media	Australia, Indonesia, China	\$30.8M	2
ICT Services	Australia	\$14M	118
Office supplies, building leases & travel	Australia	\$48.5M	118
Industrial consumables	China, Australia	\$28.3M	294
Infrastructure & site services	Australia	\$59.5M	65
Ground support materials	China, Australia	\$9.1M	20
Surface Drilling & Blasting	Australia	\$32.4M	34
Surface Exploration	Australia	\$10.7M	25
Surface Processing	Australia	\$4.7M	64
Underground Drilling & Blasting	Australia	\$37.9M	5
Underground Contract Mining	Australia	\$593.9M	182
Mobile equipment, components & spares	USA, Japan, Sweden, China	\$57.3M	345
Non-procurable	Australia	\$55.4M	301
Oils and lubricants	Australia	\$5.3M	34
Electricity, Gas & Water	Australia	\$182.1M	30
Professional Services (Engineering, Enviro, Commercial, Geophysical, HR, IT, Mining, Survey, Training)	Australia	\$128M	498



Many of our suppliers operate extensive supply chains that reach beyond Australian borders. Consequently, global supply chain challenges will impact our operations during the reporting periods.

Goods sourced both domestically and internationally are typically delivered to one of our two off-site receiving depots located in Perth and Kalgoorlie, Western Australia. At these depots, our third-party logistics provider receives and processes the goods, which are then forwarded to our operational sites via road transportation.





Modern slavery risks in our business

As described in the following section of this Statement, our approach to understanding and upholding human rights in our business is informed by the UN Guiding Principles (UNGP) on Business and Human Rights. Accordingly, our approach to assessing the potential risks of modern slavery in our business is underpinned by the ‘**cause, contribute, directly linked**’ continuum set out in the UNGP:



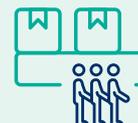
Cause

The actions of a business directly result in the occurrence of modern slavery practices, such as the use of forced labour in operations.



Contribute

The actions of a business enable modern slavery practices to occur, such as the award of a contract at rates that necessitate low-cost forced labour.



Directly linked

The business is linked to modern slavery practices through its products, services or operations, including through the tiers of its supply chain.

While Gold Fields has no direct evidence of modern slavery practices within its operations, we acknowledge that the scale and global reach of our supply chain present a credible risk for such practices.

Gold Fields is confident that the geographical location of its operations and our stringent employment practices significantly mitigate the risk of modern slavery, particularly forced labour, within our Australian business. Consequently, we do not consider the risk of child labour to be present in our operations. However, we recognise that current labour market challenges, which have led to an increased reliance on labour-hire personnel, impact the business.

Regarding our supply chain, we recognise that the risk factors associated with modern slavery are multifaceted and intricate. Specific sectors, by their inherent

characteristics—often involving unskilled labour and lower visibility—pose a higher risk for modern slavery practices. For instance, areas within our business that utilise groundskeeping, transport and cleaning services might be vulnerable to these risks. Additionally, some products or services are more susceptible to modern slavery due to their production methods, including clothing and personal protective equipment supplied to our business.

Geographical regions also present varying levels of risk for modern slavery, influenced by factors such as weak governance structures, poverty, high unemployment rates, and conflict. We endeavour to deepen our understanding of our supply chains beyond our Tier 1 suppliers to evaluate our exposure to these high-risk jurisdictions. Given the predominance of Australian businesses among our Tier 1 suppliers, we consider the

risk of modern slavery practices within these parties to be relatively low, notwithstanding the broader labour challenges previously mentioned. However, we are aware that the subsequent tiers of our supply chain may have stronger international linkages, sourcing supplies and labour from higher-risk countries. Supply categories we identify as higher risk include construction, personal protective equipment, solar panels, industrial consumables, fixed plant components, electrical and instrumentation components, grinding media, and ground support materials.

Currently, we collaborate with our Tier 1 suppliers to identify and manage modern slavery risks within their supply chains. Many of our larger suppliers actively engage in this area. We recognise opportunities to learn from their experiences, improve our practices, and assist in capacity-building efforts where necessary.



Actions taken to address identified modern slavery risks

Human rights

We recognise that our mining activities have the potential to adversely impact the human rights of our stakeholders, particularly the people, members of our host communities, and workforces utilised by our contractors and suppliers.

Gold Fields' commitment to upholding and respecting the human rights of these important stakeholders is described more fully in our Human Rights Policy Statement, which is embedded in our Code of Conduct. It applies to all Gold Fields personnel, including directors, employees, contractors, suppliers and consultants.

The Human Rights Policy Statement commits Gold Fields to, amongst others: upholding fundamental human rights and freedoms, protecting the rights of its workforce and upholding freedom from child labour and forced or compulsory labour. It also requires that we provide training and guidance for our workforce, undertake human rights due diligence, provide site-level grievance mechanisms, raise awareness with our vendors and business partners, and collaborate to address identified concerns.

The Human Rights Policy Statement is informed by and supports various international standards. These include the UN Guiding Principles on Business and Human Rights, the conventions of the International Labour Organisation, the UN Universal Declaration on Human Rights, the Voluntary Principles on Security and Human Rights and the International Council on Mining & Metals (ICMM) Mining Principles and Position Statements.

Together, 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 or related to our operations and those of our contractors, suppliers and business partners is based.

Our Group Human Rights Steering Committee oversees the work of various disciplines and regions (including the Australian Region) and provides quarterly feedback to the Board's Social Ethics and Transformation Committee (SET Committee).





Addressing modern slavery risk in our supply chain

We are steadfast in our commitment to understanding our supply chain and identifying potential human rights risks. By collaborating with our suppliers and industry peers, we aim to promote best practices in human rights and ultimately eradicate modern slavery within the mining industry.

Gold Fields actively supports our suppliers in enhancing their understanding of modern slavery practices. Recognising that suppliers may possess varying knowledge regarding modern slavery risks, we focus on capacity-building activities designed to raise awareness and address identified risks effectively.

Our philosophy is to collaborate with suppliers to mitigate modern slavery risk exposure throughout our supply chain. When issues are identified, we take appropriate action, which may include engaging third-party auditors or notifying relevant government agencies. We believe in working constructively with our suppliers to remediate and mitigate these risks.

Blocking a supplier is considered a last resort, only undertaken if a supplier is unwilling to engage constructively in Gold Fields' due diligence processes or to address identified modern slavery issues. Our approach prioritises collaboration and improvement, ensuring our supply chain adheres to the highest human rights standards and ethical practices.



Ethical business requirements

All of Gold Fields' supply agreements require our business partners to adhere to Gold Fields' Human Rights Policy Statement, Code of Conduct, Sustainable Development Policy, and Group policies relating to ethical business practices. Additionally, suppliers must ensure that they will not contribute to the abuse of human rights concerning any supplies or services provided to Gold Fields.

Gold Fields' Supplier Code of Business Conduct translates the requirements of its Code of Conduct into terms specific to our suppliers and contractors. A copy of this document is available on our website at <https://www.goldfields.com/supplier-resources.php>. It is also provided to all new contractors and suppliers in Australia during onboarding (which they must acknowledge).

If a supplier is in material breach of their contract with Gold Fields (including those terms outlined above regarding human rights and adherence to our Code of Conduct), Gold Fields may suspend or terminate the contract with that supplier. However, Gold Fields' preferred approach is, where possible, to work with our contracting partners to resolve any such issues in a reasonable timeframe.



Third-party screening solution

Gold Fields employs an external third-party screening solution to assess new and existing suppliers against a comprehensive array of pre-defined risk categories, including human rights violations and related transgressions. This robust screening process is integral to our commitment to ethical sourcing and corporate responsibility.

We use Dow Jones Due Diligence reports to enhance our due diligence process. These reports provide detailed insights into our suppliers' backgrounds and risk profiles. These reports play a crucial role in our supplier evaluation, ensuring we maintain high standards of compliance and ethical practices.

We recognise that the dynamic nature of global supply chains necessitates vigilance and adaptability. Continuous monitoring and the integration of Dow Jones Due Diligence reports enable us to respond swiftly to emerging risks and uphold our standards across all tiers of our supply chain. This comprehensive approach mitigates potential risks and fosters a culture of transparency and accountability among our suppliers.



Human Rights in Energy and Resources Collaborative (HRREC)

Gold Fields is proud to be a founding member of the Human Rights Resource and Energy Collaborative (HRREC), a Perth-based group dedicated to promoting human rights best practices and eliminating potential modern slavery in the energy and extractives sectors. This collaborative effort underscores the importance of industry-wide cooperation, knowledge-sharing, and learning from experts across the field to address these critical issues effectively.

The collaborative nature of the HRREC allows us to pool resources, share best practices, and leverage the collective expertise of leading organisations in the industry. This partnership enhances our ability to identify and mitigate human rights risks, fostering a more ethical and sustainable industry.

By working together, we can more effectively promote human rights best practices and drive systemic change. Sharing knowledge and learning from experts within the HRREC enables us to stay at the forefront of addressing modern slavery and related human rights issues. This collaboration strengthens our individual efforts and amplifies our impact, ensuring that the energy and extractives sectors uphold the highest standards of human rights and ethical conduct.

Gold Fields commits to ongoing membership and collaboration with the HRREC.



Actions to address modern slavery in our supply chain

Modern slavery risk platform

Gold Fields commenced implementing a new supplier sustainability solution in 2022, Informed 365 (i365), to replace a bespoke online platform developed several years earlier. The original platform possessed limited functionality and could not interface effectively with suppliers about their responses to our modern slavery self-assessment questionnaire (SAQ), initially developed by the HRREC.

The cloud-based i365 platform is well-suited to human rights and supplier sustainability risk management. It is used by organisations and industry bodies, including the Property Council of Australia, The Australian Red Cross, Ampol, and Blackwoods. i365 will support Gold Fields' ongoing compliance with the Modern Slavery Act, provide assurance concerning supply chain risk, and assist Gold Fields in managing broader ESG objectives such as Scope 3 decarbonisation. In addition, i365 provides Gold Fields with a technical solution that can evolve as our business needs change.

Be Slavery Free

In 2023, Gold Fields significantly enhanced its human rights due diligence by partnering with Be Slavery Free, a leading consultancy specialising in modern slavery risk management. Recognising the complexity of modern slavery risks within global supply chains, we understood the necessity of engaging industry experts to guide us through this critical endeavour.

Be Slavery Free's collaboration brought essential industry expertise to our efforts, fundamentally shaping our supplier evaluation and engagement approach. They were pivotal in implementing an enhanced Supplier Self-Assessment Questionnaire (SAQ), launched in December 2023, and were instrumental in managing the inputs into our Informed365 platform. Their guidance ensured that our methods were comprehensive and effective, enhancing our ability to identify and mitigate modern slavery risks.

Be Slavery Free facilitated our participation in their collaborative forums, known as Fight Club.

These forums provided a platform for sharing knowledge, best practices, and innovative solutions with other industry leaders committed to combating modern slavery. Through these interactions, we gained valuable insights and strengthened our strategies for addressing human rights violations within our supply chain.

Additionally, Be Slavery Free granted us access to the Mekong Club, a network of experts and resources dedicated to eradicating modern slavery in the Asia-Pacific region. This access further enriched our understanding and capabilities, allowing us to leverage a wealth of knowledge and expertise in our efforts to uphold the highest standards of human rights and ethical conduct.

Gold Fields continues collaborating with Be Slavery Free to enhance human rights due diligence and address modern slavery risks within our supply chain. This ongoing partnership ensures we stay at the forefront of best practices and leverage expert guidance to maintain ethical standards across our operations.



Self-Assessment Questionnaire

During the 2023 period, Gold Fields focused on implementing the Supplier Self-Assessment Questionnaire (SAQ) to enhance our human rights due diligence processes. After evaluating the Modern Slavery Act (MSA) questionnaire provided by the HRREC working group, we determined that it did not fit our specific requirements. We decided to transition to a more tailored approach.

With the support of Be Slavery Free, the SAQ rollout began on 19th December 2023 and continued until February 2024. During this period, we sent SAQs to our top 65 suppliers (by spend value), with a particular focus on industries rated potentially 'high-risk' for modern slavery.

Of the 65 suppliers contacted, 45 completed the SAQ, representing a 70% completion rate. When including the 20 suppliers who did not start or finish the assessment,

the rate encompasses 48% of our high or very high-risk categories. The notable industries among these suppliers were:

- **Electrical Equipment / Energy Equipment & Services:** 6 suppliers
- **Construction & Engineering / Construction Materials:** 9 suppliers
- **Metals & Mining:** 5 suppliers
- **Commercial Services and Suppliers:** 2 suppliers
- **Personal Products:** 1 supplier

Progress on SAQ	Number of Organisations
Completed	45
In Progress	8
Not started	12
Total Number of Organisations	65

Industry risk	Number of Organisations
Very High	17
High	14
Medium	7
Low	7

Industry Name	# of Organisations	Industry Risk	IRSI Risk ⁹
Air Freight & Logistics	1	High	Medium
Airlines	1	High	Medium
Chemicals	4	Medium	Low
Commercial Services & Suppliers	3	Medium	Low
Construction & Engineering	5	High	Medium
Construction Materials	4	High	Medium
Distributors	1	High	Medium
Electrical Equipment	3	Very High	Medium
Energy Equipment & Services	3	Very High	Medium
Machinery	4	Very High	Medium
Metals & Mining	6	Very High	Medium
Oil & Gas Equipment & Services	1	Very High	Medium
Personal Products	1	High	Medium
Professional Services	7	Low	Low
Road & Rail	1	High	Medium
Total	45		



Commodity Deep Dives

Gold Fields has chosen to conduct commodity deep dives based on the SAQ results to understand specific high-risk areas within its supply chains and to develop targeted strategies for mitigating modern slavery risks. This focused approach enables the identification and addressing of vulnerabilities unique to each commodity, ensuring more effective and sustainable human rights due diligence.

Construction

This report specifically focuses on the Construction Services and Construction Materials sectors, highlighting the unique challenges and necessary strategies to address modern slavery in these areas.

Key Findings

- 1. High-Risk Industry:** The construction industry is highly susceptible to modern slavery, with 18% of global victims found in this sector. In Australia, despite strong industrial relations laws, modern slavery risks persist due to the complexity and opacity of supply chains.
- 2. Supplier Engagement:** The SAQ revealed that 47% of key suppliers potentially provide construction services or materials to Gold Fields. This includes general contractors, specialty contractors, subcontractors, builders, developers, and more, indicating a broad footprint within the construction sector.
- 3. Workforce Vulnerabilities:** The construction workforce is particularly vulnerable due to factors such as high levels of debt, language barriers, lack of access to services, and isolation of work sites. These conditions create opportunities for exploitation and forced labour.
- 4. Supply Chain Transparency:** Limited visibility in the lower tiers of the supply chain poses significant challenges. Many suppliers do not have the capacity to audit beyond the first or second tier, leading to hidden risks of forced labour in raw materials and manufactured components.
- 5. Purchasing Practices:** Pressures from lead contractors, including unfair contract terms and delayed payments, exacerbate the risk of labour exploitation. Low profit margins and volatile markets also push suppliers to cut costs, often at the expense of labour rights.

Recommendations

- 1. Training and Capacity Building:** Invest in comprehensive training for Gold Fields staff and suppliers on identifying and mitigating modern slavery risks. This includes understanding legal requirements, ethical labour practices, and effective remediation strategies.
- 2. Direct Worker Voice Platform:** Implement a centralised worker voice platform to engage directly with contractors and sub-contractors. This platform can provide valuable insights into worker conditions and support the identification of modern slavery risks.
- 3. Update Purchasing Practices:** Revise purchasing policies to address current pressures faced by suppliers. Ensure that responsible purchasing practices are in place, including fair pricing, prompt payment, and managing workload changes to reduce the risk of labour exploitation.
- 4. Enhance Procurement Policies:** Push for greater transparency in procuring raw materials and manufactured goods. Customise procurement policies to address industry-specific risks, integrating standards like ISO 20400 for sustainable procurement.



Technology

This report focuses explicitly on Technology Supply Chains, highlighting the unique challenges and necessary strategies to address modern slavery in this sector.

Key Findings

- 1. High-Risk Areas:** Technology supply chains are vulnerable to modern slavery at multiple junctures across complex global supply chains. Upstream activities, such as the extraction of raw materials like cobalt, lithium, and rare earth elements, often occur in regions with weak governance and poor labour standards. Downstream activities, including manufacturing, frequently take place in areas with lax labour regulations and substantial migrant workforces, posing significant risks of forced labour and exploitation.
- 2. Case Study - Solar Panels:** The manufacturing of solar panels, predominantly concentrated in China, has been identified as a high-risk area for modern slavery. Reports indicate forced labour is present in the supply chain for most solar panels produced in China. State-sanctioned forced labour programs, particularly involving Uyghur and other Turkic Muslim groups, contribute to these risks.
- 3. Supply Chain Vulnerabilities:** The SAQ findings revealed that only 33% of suppliers had low or developing visibility over their supply chains, indicating limited awareness of potential risks beyond the first tier. This lack of visibility is particularly concerning given the prevalence of technology products and services across Gold Fields' operations.
- 4. Pressure Factors:** Complex global supply chains, lack of accountability, demand for low-cost production, rapid production cycles, and the high demand for labour-intensive processes increase the risk of modern slavery in technology supply chains.

Recommendations

- 1. Procurement Policy:** Enhance procurement policies to include stricter responsible sourcing and compliance requirements. This includes increasing the number of suppliers required to report on the provenance of technological products and obtaining certifications such as the Responsible Business Alliance (RBA) audit, SA8000 Standard, and the ETI Base Code.
- 2. Increase Certification Requirements:** Encourage suppliers to conduct regular audits and monitor technology supply chains to ensure compliance with labour standards and identify potential risks of modern slavery. Direct worker voice mechanisms can support this and provide further verification.
- 3. Supplier Compliance:** Establish consequences for non-compliance to drive change in supplier behaviour and ensure adherence to ethical labour practices.
- 4. Technology 'Refresh' Policies:** Implement policies to reduce the influx of new technology products by investing in hardware that allows for upgrades and utilising software updates to extend the lifespan of existing equipment.
- 5. Training:** Provide training for both Gold Fields staff and suppliers on identifying and mitigating modern slavery risks, focusing on understanding the conditions of forced, bonded, or unethically recruited labour.
- 6. Responsible Sourcing Initiatives:** Participate in industry-led programs that promote ethical practices and human rights in technology supply chains. This includes joining initiatives like Electronics Watch and supporting the development of procurement standards for renewable energy.
- 7. Purchasing Practices:** Ensure that contracting arrangements do not contribute to modern slavery risks by purchasing goods or services at prices that allow for the payment of a living wage.



2023 Modern Slavery Actions

The business undertook the following related actions in line with its Modern Slavery roadmap:

- **Updates to Purchase Order Terms & Conditions and Agreement templates**

In H2 2022, Gold Fields engaged a global law firm to help streamline its standard contract suite in line with current law and market practice. A team of legal specialists reviewed and redrafted Gold Fields' suite of agreements, which now include specific clauses concerning Modern Slavery. These agreement templates were progressively rolled out over the course of Q4 2022 and Q1 2023.

- **Updates to Gold Fields' Supplier Code of Business Conduct**

In Q2 2023, a new 'Supplier Code of Business Conduct' ('SCBC') was published, which replaces the 'Values and Code of Conduct Summary for Suppliers and Contractors', initially published in 2017.

The new SCBC spells out Gold Fields' commitment to upholding and respecting the human rights of our stakeholders, particularly our people, the host communities in which we operate, and the upstream workforces of our suppliers.

A condition of trading with Gold Fields is an acknowledgement by the supplier of the SCBC, which requires suppliers to respect and uphold all internationally proclaimed human rights within their operations, affiliates, and supply chains.

Under the SCBC, suppliers are expected to identify, proactively address, and, where legislation requires, report on risks of modern slavery practices in their operations and supply chains. These practices may include servitude, debt bondage, involuntary prison labour, deceptive labour recruiting, trafficking of persons, physical and psychological abuse and forced marriage.

Suppliers must not engage (either directly or indirectly) in child labour and must comply with all laws relating to minimum employment age.

All new suppliers are required to acknowledge and uphold the principles outlined in SCBC as part of Gold Fields' supplier onboarding process.

- **Conducting due diligence on new and existing suppliers**

Gold Fields strives to develop and maintain strong relationships with companies in its supply chain based on ethics, integrity, and professionalism. Increasingly, companies' reputational and operational risks are tied to these parties as they form part of a company's value chain.

Gold Fields has implemented a third-party screening solution, which screens all active parties recorded on internationally recognised and published screening databases, as well as for recorded transgressions and adverse media exposure, against various pre-defined criteria, including (but not limited to) regulatory, labour practice, environmental, health and safety management and operational issues.

The screening outcome is used as input into an Internal Screening Risk Calculator, which, amongst others, defines governance and risk management criteria, calculates a risk rating and creates a profiled view of the third party. This forms an integral part of the vendor risk management process per region concerning engagement, contractual terms, appointments, and the continuation of existing relationships.

From a contractual point of view, all our third-party agreements contain provisions that require statutory compliance and adherence to the Gold Fields Code of Conduct, Supplier Code of Business Conduct, and applicable Internal Policy Statements.

All new and existing suppliers are screened via Gold Fields' third-party screening solution on a monthly basis.



- **Update to Supplier Self-Assessment Questionnaire**

Gold Fields reviewed and revised its current Supplier Self-Assessment Questionnaire (SAQ), which was based on a document developed several years ago by the HRREC. Gold Fields has since adopted an SAQ produced by the Property Council of Australia (PCoA), which contains additional explanatory content beyond the substantive questions addressing various modern slavery risks. The PCoA questionnaire has been further refined and tailored for the resources industry and Gold Fields' supplier base.

- **Building capacity within our organisation to understand modern slavery risks, its broader context around human rights, and to identify where these risks may arise within our supply chain**

Gold Fields offers Human Rights training to personnel through an online training package consisting of four modules. This training package provides employees with an understanding of human rights, the impact of human rights on Gold Fields' personnel and third parties, their role in minimising human rights impacts, and the regional resources available to support these objectives.

We are also focused on improving the quality of information we are collecting from suppliers and our ability to understand it, and assessing what external data points we can leverage to enhance Gold Fields' understanding of its supply chain.

- **Appointment of Senior Advisor: Sustainable Procurement**

The appointment of the Senior Advisor: Sustainable Procurement was made in 2023 with the inaugural resource delivering initial role scoping and awareness activities across Gold Fields. A subsequent personnel change occurred later in the year with a new Senior Advisor: Sustainable Procurement appointed in April 2024.

- **Participation in Industry-based Modern Slavery Forums**

- 1) HRREC (see above)
- 2) International Council on Mining & Metals (ICMM) – Gold Fields is a long-standing member of the ICMM and participates in regular meetings of the ICMM's Human Rights Working Group. In 2022, a Human Rights Due Diligence Practitioners Workshop was held in Perth, Western Australia. Member companies provided feedback on the ICMM's updated Human Rights Due Diligence Guidance and supplementary tools. The ICMM's Human Rights Due Diligence Guidance (HRDD) was officially launched in May 2023 to coincide with the Voluntary Principles Initiative Plenary. This platform is an ideal place to highlight the guidance to human rights practitioners and NGOs. The full consolidated guidance can be found here, along with the individual tools for download. This includes a new captioned video and 2-page summary fact sheet.
- 3) The Commonwealth Attorney-General's Department, in partnership with the Australian Institute of Criminology, hosted the 2023 Modern Slavery Conference (conference) in Melbourne, Australia from 27-29 June 2023. The conference theme was 'Taking Action Together'. The audience, which included representatives from Gold Fields, heard from a broad range of actors, including the Federal Government, the NSW Modern Slavery Commissioner's team, the Australian Federal Police, large corporates, church bodies, the Salvation Army, NGOs and people with lived experience.



2023 Actions achieved

- Updates to the Supplier Code of Business Conduct to underline Gold Fields' commitment to upholding human rights and emphasise the requirement for suppliers are expected to identify, proactively address, and, where legislation requires, report on risks of modern slavery practices in their operations and supply chains.
- Deployed an enhanced contract template suite and purchase order terms and conditions containing specific clauses concerning Modern Slavery.
- Continued to screen all active suppliers for recorded transgressions and adverse media exposure, including (but not limited to) regulatory, labour practice, environmental, health and safety management and operational issues.
- Deployed the Informed 365 supplier sustainability solution and developed a risk-based 'plan of action' for undertaking Modern Slavery supplier due diligence via the platform.
- Appointment of a Senior Advisor – Sustainable Procurement to drive sustainable outcomes (including addressing potential modern slavery risks) across supply-related ESG activities.
- Continue to drive supplier acknowledgement of Gold Fields' Supplier Code of Business Conduct via SAP Ariba (Gold Fields' online supplier registration portal).
- Conduct the launch of our enhanced SAQ.

2024 Strategy

- Implementation of a responsible sourcing framework.
- Establish a human rights procurement standard that aligns with the existing human rights policy.
- Improvements to our due diligence processes and monitoring.
- Awareness and training sessions for employees that will be tracked through figures and percentages.
- Improve our supplier engagement and relationship management methods – (potential human rights forums – TBD.)
- Bespoke training for procurement professionals exposed to decision-making processes that could have human rights impacts – to be refreshed annually.
- Development of a remediation process for high-risk and human rights alerts.
- Development of a site-based human rights audit checklist for site spot checks.
- Implementation of a Whistleblower Hotline or process that is specific to the needs of modern slavery.
- Implementation of modern slavery questions into our tender and evaluation documentation.
- Human Rights risk assessment/outcomes should be included in our Recommendation for Award (RFA) documentation.



How we assess the effectiveness of our actions

As we develop our modern slavery risk management plan, we are following a process of continuous review, evaluation and improvement. In doing so, we recognise that we are in the early stages of implementation, and that the effectiveness of our actions will be better understood in time.

For Gold Fields, the effectiveness of our response is assessed through a range of quantitative and qualitative factors, primarily focused on the development of understanding and awareness around modern slavery risks, but secondarily around our ability to identify and remediate instances of modern slavery in our business and supply chains. These measures are set and assessed by a cross-disciplinary team from our Legal and Compliance, Corporate Affairs, Sustainable Development and Supply Chain functions, and include:

Quantitative measures – outputs	Qualitative measures – outcomes
Number of employees trained	Level of awareness and understanding achieved
Number of supplier due diligence assessments conducted	Level of awareness and understanding achieved
	Understanding of modern slavery risk profile
	Identification of instances of modern slavery
Human rights risks assessments conducted	Level of awareness and understanding achieved across the organisation
Number of Human Rights Steering Committee meetings held	Consideration of modern slavery issues and awareness achieved across the corporate group
Number of modern slavery related grievances raised through Gold Fields' reporting mechanisms	Remediation of identified instances of modern slavery
	Obtaining feedback from external sources, including participants in the Human Rights Resource and Energy Collaborative and NGOs

As awareness and maturity of modern slavery issues build, both within Gold Fields' business and our supply chains, greater emphasis will be placed on the identification and remediation of instances of modern slavery. Completing the supporting software platform will also aid in monitoring and reporting.



GOLD FIELDS

Creating enduring value beyond mining



safety



integrity



respect



responsibility



innovation



collaborative
delivery

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