

Modern Slavery Statement 2022

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ABOUT THIS STATEMENT

Scope of this Modern Slavery Statement

This Modern Slavery Statement (hereafter 'Statement') has been prepared by West African Resources Limited (the 'Company') and its controlled subsidiaries ('WAF', 'West African', or the 'Group') in accordance with the Australian Government's Modern Slavery Act 2018 (No. 153, 2018) (hereafter the 'Act'). The reporting period is the 2022 calendar year (1 January 2022 to 31 December 2022).

This Statement discloses information required under the Act, including Article 13 describing the reporting entity and responsibilities, and Article 16 on the mandatory criteria for modern slavery statements. WAF's corporate Sustainability Department prepared this report on behalf of the Group. Consultation included WAF's corporate Human Resources department and the Procurement department of SOMISA, which is the Group's primary operating subsidiary in Burkina Faso. Other Group subsidiaries in Burkina Faso were not consulted for this Statement as their operations and supply chains in 2022 were minor relative to SOMISA Due diligence processes will be implemented by these subsidiaries as their operational capacity increases.

In particular, the HR and Procurement departments were asked to:

- Describe procurement processes followed, including policies and contractual procedures;
- Provide information on suppliers and contractors;
- Reflect on the previous year of implementing the Modern Slavery Questionnaire and the associated challenges and opportunities to improve this process; and
- Review and update WAF policies and the Code of Conduct to better reflect the Group's commitment to reducing the risks of modern slavery in its business operations.

The following table summarises the mandatory reporting requirements and where they are addressed in this Statement. WAF's 2022 Sustainability Report further addresses WAF's approach to human rights management.

Table 1 Modern Slavery Act 2018 Reporting Index						
Article 16 criteria	Mandatory Requirement	Location in this Statement				
16 (1)(a)	Identify the reporting entity	Company Structure and Operations (p4)				
16 (1)(b)	Describe the structure, operations and supply chains of the reporting entity	Company Structure and Operations (p4) Supply Chain (p6)				
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	Addressing Modern Slavery Risks (p7)				
16 (1)(d)	Describe the actions taken to assess and address those risks, including due diligence and remediation processes	Addressing Modern Slavery Risks (p7)				
16 (1)(e)	Describe how the reporting entity assesses the effectiveness of such actions	Addressing Modern Slavery Risks (p7)				
16 (1)(f)	Describe the process of consultation on the development of the Statement with any entities that the reporting entity owns or controls	About this Statement (p1)				

In this Statement, the term 'modern slavery' refers to exploitative practices such as trafficking of people, slavery, forced labour, child labour, removal of organs and other slavery-like practices as defined by the Government of Australia¹.

Approving entity

This Statement was approved for release by West African Resources Limit's Board of Directors on 20 July 2023.

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RICHARD HYDE Executive Chairman & CEO West African Resources Limited

¹ Commonwealth of Australia, 2017. Hidden in Plain Sight: An inquiry into establishing a Modern Slavery Act in Australia.

2022 HIGHLIGHTS

• Implementation of the Modern Slavery Risk Assessment Questionnaire for service providers at SOMISA.

ACTIONS FOR 2023

- Review Modern Slavery Risk Assessment Questionnaire process and extend to include goods providers and contracts due for renewal.
- Develop a Modern Slavery Factsheet for internal stakeholders and external suppliers.
- Finalise Human Rights Policy.

1. COMPANY STRUCTURE AND OPERATIONS

West African Resources Limited is an Australian public company, listed on the Australian Securities Exchange (ASX) under trading symbol *WAF*, with its corporate head office in Perth, Australia. The Group holds mining leases and exploration tenements in Burkina Faso via its subsidiary companies.

The Group's flagship project is the Sanbrado Gold Mine ('Sanbrado') which entered into production in March 2020, just four years after the discovery of the high-grade M1 South deposit. With the acquisition of the Toega and Kiaka Projects in 2020 and 2021, respectively, WAF has consolidated a 1,700 km2 exploration land package over the prospective Markoyé Fault region in central and southern Burkina Faso.



The Group's organisational structure and list of subsidiaries are presented below.



Entities	Country of incorporation	Ownership interest (%)
Parent company		
West African Resources Limited	Australia	
Direct subsidiaries		
WAF Finance Pty Ltd	Australia	100
Wura Resources Pty Ltd SARL	Burkina Faso	100
West African Resources Development SARL	Burkina Faso	100
Channel Resources Ltd	Canada	100
Volta II Ltd	Cayman Islands	100
Indirect subsidiaries		
Channel Resources (Cayman I) Ltd	Cayman Islands	100
Channel Resources (Cayman II) Ltd	Cayman Islands	100
Tanlouka SARL	Burkina Faso	100
Société des Mines de Sanbrado SA ¹	Burkina Faso	90
Volta Resources (Cayman) Inc.	Cayman Islands	100
Volta Properties SARL	Burkina Faso	100
Kiaka Gold SARL	Burkina Faso	100
Kiaka SA ¹	Burkina Faso	90

¹The remaining 10% is held by the government of Burkina Faso.

As of 31 December 2022, WAF directly employed 730 people globally. When combined with interns and third-party contractors to fulfill specialist positions, the total workforce is around 1,600 people. The majority of employees work at Sanbrado, with smaller teams located in WAF offices in Ouagadougou and Perth, and at the Toega and Kiaka Project sites.

1.1 Governance

West African Resources Limited has a corporate governance framework in place that includes the corporate governance policies, charters, and codes formally adopted by the Board ('the Policies'). The aim of the Policies is to ensure that West African is effectively and ethically directed and managed, that risks are identified, monitored and assessed and that appropriate disclosures are made. The Board of Directors holds the ultimate responsibility for setting WAF's vision and values, and ensuring the Group is aligned with international standards. The Company's Code of Conduct, which must be read and signed by all employees, specifically addresses WAF's values and commitments to protecting human rights.

"Human rights are the basic rights and freedoms to which all people are entitled, without discrimination.

The Company is committed to supporting the protection of human rights in all of our business activities, including the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero-tolerance approach to modern slavery, forced labour, child labour and unlawful discrimination. This commitment is held without regard to location or function.

The Company prohibits the use of any form of slavery or forced labour in its operations, and has an expectation that business partners will also uphold the same standards. The Company has adopted the Voluntary Principles on Security and Human Rights, and continues to develop human rights policies in line with international standards and guidelines.

We aim to identify, assess and eliminate potential adverse human rights impacts in our operations and supply chain through ongoing due diligence and appropriate management."

WAF Code of Conduct (2022, p.7)

2. SUPPLY CHAIN

Supply chain management involves the identification and selection of suitable suppliers, arranging supplier contracts and purchase orders, and undertaking services management. The process is governed by Procurement Policy and Procedures (2020).

WAF's corporate head office provides governance functions and strategic direction. To support WAF's operations in Burkina Faso, a procurement team of 40 people, including a department manager are located in Ouagadougou and at Sanbrado. This procurement team oversees purchasing expediting, procurement, and warehouse management.

In 2022, WAF worked with 824 goods suppliers and service providers, of which almost 60% are from Burkina Faso.

The key sectors in our supply chain are:

- Parts and consumables supply;
- Equipment supply;
- Operational works services;
- Capital works services; and
- Professional and administrative services.



3. ADDRESSING MODERN SLAVERY RISKS

3.1 Risks of Modern Slavery in WAF's Operations

WAF adheres to the Voluntary Principles on Security and Human Rights and takes steps to identify and address risks of modern slavery in its operations and supply chains.

In 2022, WAF undertook an enterprise level risk assessment of the Group's practices led by the General Manager - Risk. There were no risks of modern slavery identified within activities directly undertaken by WAF. However, it is possible that the risk exists in the Company's supply chain indirectly in the labour practices associated with the production of goods used by WAF and in small-scale local suppliers.

3.2 Actions to Prevent Modern Slavery

The diagram below sets out WAF's multi-faceted approach to identifying and managing modern slavery risks in our operations and supply chain.



3.2.1 Procurement Policy and Procedures

Addressing modern slavery and human rights risks in the supply chain depends on employees and suppliers upholding the Group's principles. The Procurement Policy and Procedures (2020) of the Group's Burkina Faso operations specifies the ethics and sustainability mandates during the procurement process, including:

- Purchasing of goods or engagement of services must be compliant with the laws of Burkina Faso.
- All staff must uphold their responsibilities as outlined in the Code of Conduct and the procurement policy and procedures, including ethical conduct, social responsibility, transparency, auditability and accountability, and sound risk management.

3.2.2 Contract Terms

Only those vendors that attest to respecting and complying with all applicable health, safety, environmental, employment and fiscal regulations are considered in the vendor process. All vendor contracts include contractor obligations related to regulatory compliance and WAF's standards, policies, procedures and principles. The procurement policy and procedures, and contract form used by WAF's Burkina Faso operations are provided to employees and suppliers in English or French languages, as appropriate.

3.2.3 Modern Slavery Questionnaire

In 2021, WAF developed a Modern Slavery Risk Assessment Questionnaire for contractors, based on the Government of Australia's Procurement Toolkit². The questionnaire was developed by WAF's corporate sustainability department in consultation with the procurement department. and is available in English and French languages.

Completed questionnaires are reviewed together with contractual documents. If any potential high risks are identified in the responses, these are addressed by the commercial and procurement departments and, at the corporate level, by the general managers for sustainability and risk.

In 2022, the questionnaire was supplied to new contractors as part of contract documentation. A total of nine responses were received.

3.2.4 Training and Awareness Raising

WAF aims to build awareness of modern slavery within our workforce and with suppliers to improve their ability to identify modern slavery risks in our operations, supply chain and communities surrounding our operations in Burkina Faso. A modern slavery fact sheet will be developed in 2023 for use both internally with WAF's employees and externally with suppliers.

3.2.5 Review and Continuous Improvement

A meeting was held in early 2023 with the SOMISA Commercial Manager, WAF General Manager – Sustainability and the Environmental and Social Specialist, to review the first year of implementation of the modern slavery risk assessment questionnaire. This meeting identified areas for improvement in the process of administering the questionnaire and other actions to enhance assessment of modern slavery risks, including:

- Expanding application of the questionnaire from the start of 2023, to include it as part of the contract renewal process for existing contractors.
- Engaging with suppliers and contractors on modern slavery issues where a risk has been identified.
- Developing a modern slavery fact sheet to assist the commercial and procurement team, and suppliers to understand:
 - o the intent of the questionnaire,
 - The Company's responsibility in disclosing its modern slavery risk management process under the Modern Slavery Act 2018, and
 - Application of the Voluntary Principles on Security and Human Rights in WAF's operations.
- Developing an implementation guide to assist the procurement teams in identifying and escalating concerning or unclear responses from contractors.

As additional data becomes available from supplier questionnaires, we will look to identify any trends in modern slavery risks within WAF's supply chain and opportunities for eliminating or reducing these risks. This analysis will involve the sustainability, risk, and procurement departments. In addition to

² Australian Government. Supplier Questionnaire – Identifying modern slavery risks. Source: https://modernslaveryregister.gov.au/resources/

questionnaire responses, WAF will also review information from WAF's corporate and project-specific grievance registers and any relevant reports submitted under the Whistleblower Policy. The results of this annual review will be addressed in future modern slavery statements and will be used to develop improvements to WAF policies and practices. In 2022, no concerns related to human rights or modern slavery were reported in the grievance registers or under the Whistleblower Policy.

3.3 Remediation

WAF is committed to preventing impacts on human rights in our operations. Where an issue is identified, whether within WAF operations or within the Group's supply chain, an investigation will be undertaken to document the issue and determine an agreed course of remediation. If the investigation determines that a vendor has breached or may breach their contract conditions, WAF will initially engage and work collaboratively to raise awareness with the vendor and resolve any concerns. If this is not successful, WAF reserves the right to terminate the contract.

During the reporting period of this Statement, no modern slavery risks were identified which required remediation.