



Modern Slavery Statement FY25

29 December 2025



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1. Introduction

At St Barbara Limited (St Barbara, the Company, We, Us, Our), we are committed to upholding high standards of integrity and ethical conduct in all our operations. We recognise our responsibility to ensure that our business practices in Australia, Canada and Papua New Guinea (PNG), do not contribute directly or indirectly to modern slavery, child labour or human trafficking in any form. We understand that responsibility extends beyond the well-being of our direct employees to our supply chain, the prosperity of the communities we touch and the environments we operate in. We believe that, together with our stakeholders, we can make a meaningful difference and set an example for ethical and responsible business practices in the mining industry.

St Barbara Limited's Modern Slavery Statement outlines our approach to evaluate and address our modern slavery and child labour risks. As a result, St Barbara's FY26 commitments continue to focus on making meaningful change in our Papua New Guinea operation and supply chain.

This Modern Slavery Statement (Statement) is made pursuant to the *Modern Slavery Act 2018* (Cth) (Australia) and the *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023* (Canada) (collectively, **Modern Slavery Acts**) by St Barbara Limited, for the financial year ended 30 June 2025 (FY25).

This Statement should be read in conjunction with our other periodic and continuous disclosure announcements lodged with the ASX, including our FY25 Annual Report and FY25 Corporate Governance Statement, which are available at <https://stbarbara.com.au/>.

In accordance with the requirements of the Modern Slavery Acts, I attest that the St Barbara board of directors has reviewed the information contained in this Statement. Based on their knowledge, and having exercised reasonable due diligence, they have attested that the information in the Statement is true, accurate and complete in all material respects for the purposes of the Modern Slavery Acts, for the reporting year ending 30 June 2025.

Andrew Strelein
Managing Director & Chief Executive Officer



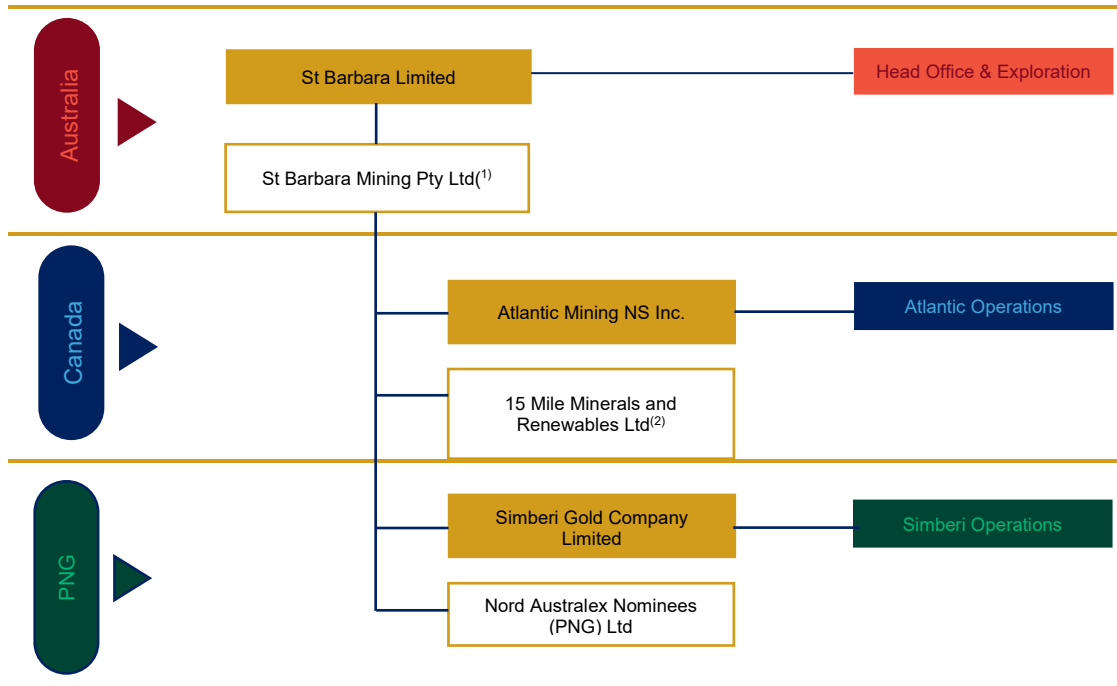
2. About St Barbara

2.1. Reporting Entity and Structure

This Statement is made on behalf of St Barbara Limited and its subsidiaries including Atlantic Mining NS Inc (incorporated in Nova Scotia, Canada, company number 4433421), 15 Mile Minerals and Renewables Ltd (incorporated in Nova Scotia Canada, company number 4637403) and Simberi Gold Company Limited (incorporated in Papua New Guinea (PNG), company number 1-26598).

St Barbara is listed on the Australian Stock Exchange and is a mining company engaged in the exploration, development, mining, and sale of gold with operations and projects in Australia, Canada and PNG.

An overview of our corporate structure is provided below:



(1) Formerly Phoenician Metals Pty Ltd. On 12 September 2025 the company changed its name to St Barbara Mining Pty Ltd.

(2) Formerly 4637403 Nova Scotia Limited. On 20 March 2025 the company changed its name to 15 Mile Minerals and Renewables Ltd.

Key

Non-Operating Entity

Operating Entity



2.2. Operations

St Barbara’s operations encompass the exploration, development, mining, processing and delivery of gold doré for refining as well as the closure and rehabilitation of our mine sites.



During the reporting period, the following activities were conducted:

Papua New Guinea (Simberi operations)

Activities associated with open cut gold mining and processing were conducted on Simberi Island, New Ireland Province. Studies were also undertaken in relation to a prospective mine expansion and future transition from oxides to sulphides mining.

Approximately 1,700 people are engaged in the Simberi operations at any one time, with approximately 830 employed directly by St Barbara and approximately 870 employed indirectly either as labour hire or through service contractors.

Our PNG operations are overseen by our Executive General Manager – Simberi who reports directly to the Managing Director and Chief Executive Officer of St Barbara.

Canada (Atlantic operations)

Activities associated with mining and processing gold were conducted at Touquoy, Nova Scotia until the site was placed into care and maintenance in November 2023.

Since operations ceased at Touquoy, activities have involved exploring in various areas of Nova Scotia, rehabilitation and environmental monitoring of Touquoy and permitting and project development activities in relation to 15 Mile, Beaver Dam and Cochrane Hill.

Atlantic now employs 40 personnel in Canada across various roles including permitting, rehabilitation, tenement management, exploration, financial management, human resources, community relations and site operations and management. Our Canadian operations are overseen by our Vice President – Atlantic Operations who reports directly to the Managing Director and Chief Executive Officer of St Barbara.

Australia (Head office and exploration)

Our corporate head office is located in Perth, Western Australia where our Managing Director and Chief Executive Officer is based.

Since the sale of the Leonora operation in Western Australia at the end of FY23, Australian activities have been limited to exploration activities in Pinjin¹, Western Australia and Back Creek, New South Wales.



¹ The Company divested its interest in the Pinjin Joint Venture on 12 March 2025.



2.2.1. Sustainability

Environmental, social and corporate governance are central to our business. Our values-driven culture, underpinned by our Group-wide commitments, are integral to the working lives of all our workers and operations. St Barbara measures and reports on environmental, social, and economic performance in the Annual Report, governs the business via approved charters, policies and standards and the Code of Conduct.

3. Supply Chain

The mine operational supply chain encompassed goods and services broadly from the following categories:

- Labour hire and other contracted services;
- Heavy machinery fleet, including parts and tyres;
- Engineering and construction services;
- Reagents and fuel;
- Transportation and logistics, including shipping; and
- Processing equipment including prefabricated equipment.

The supply chain in respect of exploration, mine development, permitting and reclamation encompasses professional services including engineering and technical services (hydrologist, geochemistry, geophysical, drilling, electricians, mechanics, construction/civil contractors).

St Barbara endeavors to buy locally in the country of operation, mitigating supply chain risk to business continuity and providing economic support to the countries and communities in which we operate.

The procurement function within St Barbara is largely managed at site level with purchasing occurring within the Atlantic and Simberi operations rather than from head office. This allows for closer relationships, accountability and transparency with suppliers.

St Barbara engages suppliers around the globe. The majority of suppliers are domiciled in Australia, PNG and Canada, reflecting the utilisation of local suppliers wherever possible.

A number of suppliers supply goods that are either grown or manufactured in locations other than where those suppliers are domiciled. St Barbara's focus has remained on first-tier suppliers to build maturity with this group before progressing to the more complex challenge of understanding second tier suppliers.

4. Modern Slavery Risks at St Barbara

In consultation with management and key internal stakeholders, we have assessed modern slavery risks to identify and evaluate the potential risks of modern slavery and child labour in the operations and supply chains.

Recognising the shared responsibility, we collaborate with industry partners, Non-Government Organisations, and governmental bodies in Australia, Canada and PNG to tackle the challenges associated with modern slavery and child labour.

Consistent with the UN Guiding Principles on Business and Human Rights, the risk of modern slavery practices is assessed in our operations and supply chain by determining whether we have caused, contributed to, or are directly linked to modern slavery. In response, modern slavery and child labour risk have been categorised as being either "Direct" (caused by St Barbara) and "Supply Chain" (indirectly contributed to by St Barbara) modern slavery risks.

4.1. Direct Modern Slavery Risk

According to the Global Slavery Index, forced labour predominantly occurs in high-risk industries such as agriculture, construction, domestic work, meat processing, cleaning, hospitality and food services. The mining industry is not listed directly, and whilst we utilise construction, cleaning and hospitality services, they generally are supplied on our premises therefore providing transparency and providing better oversight that contractual requirements are adhered in terms of compliance to our policies and procedures.

The highest exposure to risk of modern slavery relates to our Simberi operations. A summary of the risks within our operations is summarised below:

4.1.1. Canada and Australia

Due to the highly skilled nature of our workforce in Australia and Canada, the low jurisdiction risk of modern slavery and child labour in Australia and Canada (Australia and Canada are ranked 149 and 144 out of 160 countries for modern slavery prevalence by the 2024 Global Slavery Index) and our transparent recruitment and remuneration programs, we consider that there is a low risk of direct modern slavery and child labour practices in our Australian and Canadian operations.



4.1.2. PNG

We consider that there is a higher risk of modern slavery and child labour in our PNG operations because:

- PNG has a much higher incidence of modern slavery owing to the levels of social inequality, poverty and inadequate laws to prevent practices resulting in modern slavery (PNG is ranked 20th for modern slavery prevalence by the Global Slavery Index); and
- approximately 71% of our PNG workforce is engaged in unskilled or low skilled work which is more readily susceptible to modern slavery and child labour with the remaining 29% of our workforce in PNG being highly skilled with strong competition for their services in the resources industry such that these workers are typically well paid in comparison to other workers.

However, labour conditions in PNG are often regulated by local customary systems - such as tribal and clan type organisations of mutual aid and reciprocity - making modern slavery (versus simple poverty) less likely amongst unskilled and low skilled workers.

Risk amongst workers engaged directly by St Barbara

We are able to eliminate the risk of modern slavery where workers are engaged directly by St Barbara (or our subsidiaries) rather than through labour hire providers and service providers. Directly engaged workers make up 49% of the Simberi workforce. Appropriate processes and frameworks are in place to ensure that all workers (and particularly unskilled workers):

- are paid in accordance with our remuneration framework, and not less than the national minimum wage set by the Minimum Wages Board of PNG (currently 3.5 PGK per hour) - our lowest annualised salary in FY25 was K13,305 per annum plus superannuation for entry level positions;
- work appropriate hours with rostered time off, meal breaks and access to annual leave and sick leave;
- have appropriate living conditions when on our site including shared or single room accommodation, three meals per day, drinking water and other staff amenities, provision with appropriate clothing and personal protective equipment; and
- are adults and not child workers albeit that verifying the age of locals on Simberi Island remains challenging as birth certificates are rarely held by candidates from local communities, National ID Cards (NID) are challenging for locals to obtain and the majority of locals do not have driver's licenses as they do not have vehicles.

Despite these measures, there is still a risk that workers are not paid an appropriate "living wage", particularly where workers are local to Simberi Island given the isolated location. Living costs, including food costs, can often increase in the locality of mines, often because the local area can no longer support the increased population, or local farmers have become mine workers. This risk exists at Simberi given higher wages amongst the workforce and possible effects on inflation.

However, the risk of worker's not being paid a "living wage" is mitigated through the annual salary review process which accounts for market dynamics and other impacts. 510 PNG nationals received a pay increase of 4% in line with inflation in FY25.

We are proud of the role we have played and continue to play in improving the living standards of the residents on Simberi Island and that of workers from other provinces of PNG. In FY25 we partnered with the local Simberi community to:

- continue to support the creation and continued sustainable operation of local Simberi Cocoa cooperatives acting as lead partner and working with stakeholders through the PNG Agriculture Commercialisation and Diversification Project funded through a K1.2M World Bank Grant;
- continued to expand the Simberi Women in Mining Association (SWIMA) program to include the production of fruits and vegetables on Simberi Island; and
- proved micro-loans, technical support and business development training to encourage local entrepreneurship.

Through increasing food security, health and safety, education and economic prosperity of the people of Simberi Island we are decreasing the susceptibility of modern slavery as well as poverty.

Risk amongst workers engaged through labour hire agencies

There is an increased risk of exploitation and modern slavery amongst workers engaged through labour hire companies, which account for approximately 18% of our workforce.

Although we have knowledge of the rates paid to labour hire agencies, we do not always have visibility of the rate then paid to the relevant workers. Many labour hire contracts stipulate that the rate paid to the relevant labour hire agency is the relevant worker's cost, plus a designated percentage. However, verifying that the workers are paid the base cost communicated by the labour hire agency can be difficult. Moreover, we face difficulties verifying whether labour hire agencies charge employees certain costs associated with their employment such as travel, tooling, personal protective equipment or "recruitment fees".

During the reporting period, a labour hire supplier operating in PNG was identified as having instances of non-payment of wages to its employees. Upon becoming aware of this issue, the Simberi operation engaged directly with the supplier to require immediate rectification of all outstanding worker payments. The matter was managed in accordance with the Company's contract and performance management processes. As a result of the supplier's failure to meet required standards and contract terms, the supplier is no longer engaged to provide services to the Simberi operation.

Risk amongst workers engaged through recruitment agencies

Some of the workers engaged directly by us are recruited with the assistance of third-party recruitment firms and agencies.

There is a risk that some of these agencies may engage in practices which constitute modern slavery. For example, some agencies may charge workers a "recruitment fee" upon selection for a role or require certain costs to be reimbursed such as tooling, clothing



and travel expenses. These costs may be required to be paid by the workers under a loan agreement subject to exorbitant rates of interest.

Workers from locations with typically lower salaries than those offered by us may be more susceptible. Recruitment agencies may also often use the services of another “local” agency to recruit workers and may not be aware of the arrangements made between that agency and the relevant worker.

This risk was highlighted in FY24 and will be a further focus for efforts to eradicate modern slavery in FY26.

4.2. Indirect (Supply Chain) Modern Slavery Risk

St Barbara has previously undertaken a review of its first-tier suppliers to determine the goods and services with a higher supply chain risk. In FY25 it was decided due to St Barbara’s size, resources and risk profile that focus would remain on first tier suppliers, in particular, Simberi landowner organisations.

4.2.1. How Risk is Assessed

The risk associated with first tier suppliers was determined by reference to the following considerations:

Location

Workers are more susceptible to modern slavery in countries where laws are inadequate or inadequately enforced to prevent the practice, or where people are more exposed to poverty, discrimination, inequality, war and conflict.

Supplies to St Barbara’s Canadian and Australian operations are considered to be lower risk. Both Australian and Canadian suppliers operate in strong regulatory environments and are subject to employment law that set minimum working standards and pay. The Australian Government has had the second strongest response globally to modern slavery according to the Global Slavery Index. Whilst the Canadian Government’s response doesn’t rank as high, it does have the 17th lowest slavery prevalence in the world.

Suppliers to St Barbara’s PNG operations are at higher risk of modern slavery. According to the 2023 Global Slavery Index, an estimated 10.3 in every thousand people were in modern slavery in PNG at any point in 2021. In terms of prevalence of modern slavery, PNG ranks 20th globally and 5th within Asia and the Pacific. In FY25, 44.6% of St Barbara’s global supply was sourced from within PNG.

Worker Profile

The types of workers involved in the supply of goods and services can indicate modern slavery risk. Industries involving unskilled or low skilled workers, where the work is considered dangerous or demeaning, or where the work is performed at a remote or unsupervised location are at higher risk of modern slavery.

Workers providing professional and highly skilled services are at much lower risk. For these reasons, engineering services and technical services including services requiring a formal qualification or minimum level of experience are considered to be less susceptible to modern slavery practices.

Our PNG operations utilise a range of security, cleaning and property maintenance services from local Simberi landowner organisations. These types of services are supplied by unskilled or low skilled workers and so are more vulnerable to modern slavery and child labour and have remained the focus of our risk reduction activities.

Supplier Profile

An individual supplier’s commitment to reducing modern slavery is indicative of modern slavery risk. Suppliers with governance frameworks and training in place to prevent modern slavery are at much lower risk.

During our risk assessment activities, we have identified that local landowner organisations providing services to our PNG operations have limited management and administrative systems to prevent modern slavery. We have requested these local landowner organisations to complete questionnaires manually to help us assess their modern slavery risk. These questionnaires indicate there is a governance risk within these organisations that could lead to an increased modern slavery risk. 20 out of 28 landowner organisations failed to complete the questionnaire as requested, indicating a higher risk of modern slavery than the other landowner organisations. The completion rate has decreased compared to FY24, St Barbara management has noted the decrease and responded with the commitment regarding landowner survey participation in Section 8.

4.2.2. Identification of High-Risk Suppliers

As a result of the risk assessment activities described above, St Barbara continues to assess the highest indirect supply chain risk as:

- within suppliers providing contracted services and labour hire to St Barbara’s Simberi operations of an unskilled or low skilled nature; and
- Simberi landowner groups.

For this reason, in FY26, St Barbara will continue to focus its efforts on reducing modern slavery risk to these groups of suppliers.



Amongst goods supplied to us, electronic goods and rubber tires are considered to be more susceptible to modern slavery at lower levels of the supply chain given the commodities and parts incorporated into the finished goods. However, we have not focused on mitigating the risk of modern slavery associated with these goods given our size and influence in the supply chain, and much higher risk of modern slavery amongst our direct service suppliers.

5. Actions to Address Modern Slavery Risk

We have conducted a number of activities to address the risk of forced labour and child labour in our supply chain, notwithstanding that we believe that the risk is low given the scope of goods and services that we acquire and the nature of our business activities.

Our efforts have concentrated on implementing actions within our Simberi operations given the higher assessed supply chain risk.

5.1. Operational Actions to address direct Modern Slavery Risk to date

5.1.1. Living Conditions

- Construction of new camp facilities (rooms, kitchen, mess) started with completion planned for February 2026 with older and multi-person accommodation to be phased out once expansion construction activities are completed;
- Maintained cleaning and maintenance protocols for the camp to ensure acceptable operating standards;
- Established an optical assessment program for employees on site with free access to an optician and corrective Safety eyewear as required;
- Provided medical health care including preventative health checks to all employees; and
- Contributed to the provision of infrastructure to Simberi Island including but not limited to, medical health care, roads, airport, wharf, education, law and order, water and sanitation.

5.1.2. Child Labour

Recruitment Process includes:

- Applicants providing their age on employment forms;
- Visual verification of employees and contractors age where age verifying documentation is not available;
- Training and awareness programs provided to staff to recognise and prevent potential issues related to modern slavery; and
- Engaged with the PNG Resources Industry Human Resources Network at the Korn Ferry Conference to share learnings with industry peers and determine whether any new methods were being used to support age verification.

5.1.3. Wages

- Remuneration Framework that guides how roles are salary assessed and grouped into salary banding;
- Annual salary reviews to ensure pay equity amongst employees and to account for market and impacts;
- Twice monthly review of Simberi payroll by the Australian corporate Human Resources and Finance functions for verification of compliance with protocols;
- Participation in the Korn Ferry Salary Survey for external and independent salary benchmarking data to ensure fair, transparent and current remuneration based on experience and qualifications for a role;
- A Workplace Consultative Committee established that is made up of employees from different work areas to provide a forum for raising and sharing employment related concerns, provide feedback on employment matters and provides employee and engagement improvement opportunities to speak directly to Simberi Management; and
- Assessment of the effectiveness of the annual review process of salary/wages against minimum wage as well as fortnightly pay run approval process to ensure subject matter experts review for adequate segregation of duties.

Annual Commitments listed in Section 8 indicates that in FY26 we will continue to focus on recruitment agencies, used to recruit workers engaged directly by us, to ensure ethical recruitment practices.

5.2. Supply Chain Actions to address indirect Modern Slavery Risk to date

5.2.1. Supplier Onboarding Screening

New suppliers are required to complete a due diligence survey before commencement. The questionnaire also helps us assess if the suppliers have management systems that will adhere to our Code of Conduct and if the suppliers have their own modern slavery and human rights policy.

St Barbara does not to engage with third parties where the minimum national and/or international legally required labour standards are not adhered to or where we reasonably believe, following a modern slavery risk assessment, that the third party or its suppliers engage in modern slavery (Minimum Standards).

St Barbara does not enter into or renew any contract with a third party whose risk of modern slavery is assessed as high without evidence that the third party has in place adequate controls to manage the risk of modern slavery.

5.2.2. Supplier Minimum Requirements

Suppliers are required to have a governance framework in place that meets our minimum requirements, including the following:

- Health and safety;
- Environment;



- Anti-bribery and anti-corruption; and
- Modern slavery.

5.2.3. Audits and Site Visits

St Barbara conducts audits of its suppliers to ensure their compliance with our standards. Audits and site visits that have been completed on selected suppliers have not indicated a risk of exploitation.

St Barbara is confident that the schedules and rates negotiated with its suppliers are reasonable and commercial and do not place the suppliers' workforce at risk of exploitation by their employer.

Annual Commitments as listed in Section 8 indicate in FY26 we will audit one landowner supplier, selected at random, to understand their level of compliance to their own policy requirements and, if required, partner with the suppliers to develop remediation plans for any audit findings with the goal of remediation before being re-audited in FY27.

5.2.4. Contract Terms and Conditions

St Barbara have included provisions in supply contracts requiring minimum standards regarding health and safety, environment, anti-bribery and anti-corruption, forced labour and child labour.

In accordance with the Annual Commitments as listed in Section 8, in FY26 we will assess the effectiveness of the FY25 due diligence checklist and policy expectations for suppliers of unskilled labour and refine the approach where required.

5.2.5. Rate Reviews

Supplier rates are reviewed at tender for reasonableness to mitigate the risk of workers being paid poorly by underbid contracts.

5.2.6. Employee Training

St Barbara has developed and implemented a modern slavery training module for staff within its Simberi operations who manage contracted service suppliers.

5.2.7. Policies and Procedures

St Barbara has ensured that forced labour and child labour risk is addressed in its governance framework in alignment with the Company's values. To that end, the following policies and supporting procedures have been adopted and implemented across the Group, with training included as part of inductions and refresher training conducted on a regular basis:

- Modern Slavery Policy;
- Modern Slavery Procedure;
- Community and External Relations Policy;
- Code of Conduct;
- Supplier Code of Conduct;
- Procurement Policy;
- Whistleblower Policy; and
- Human Resource and Recruitment guidelines.

5.2.8. Reporting

A whistleblowing hotline is available for the Company's workers (including workers employed by suppliers) to report incidents of modern slavery and worker exploitation. Anonymous reporting options are available to encourage fulsome disclosures.

6. Assessing Effectiveness

St Barbara assesses the effectiveness of preventative actions by:

6.1. Simberi Landowner questionnaires

Monitoring and reviewing Simberi landowner questionnaires to assess the extent that landowner suppliers recognise modern slavery risks and the activities to focus on in partnering with those suppliers to help them address the risk of modern slavery within their organisation. As the understanding of modern slavery increases within the landowner suppliers and their processes mature, we will shift focus to compliance and audits.

FY25 questionnaire was supplied to 28 local landowner suppliers. Survey participation was 29 per cent, representing a decrease from the prior financial year. SGCL recognises the need to improve participation rates and will continue to engage directly with suppliers to strengthen response levels and understanding of modern slavery requirements. While the response rate remains limited, the results provide insight into areas of both strength and ongoing risks:

- **Child labour:** All respondents confirmed that they verify the age of workers and do not employ anyone under the age of 18.



- **Recruitment practices:** One landowner supplier reported that their recruitment methods may not be free from coercion. This response has been flagged for further engagement and review.
- **Wages:** While 37% of respondents reported paying wages below minimum wage, SGCL's subsequent review of hourly rates confirmed that wages paid were above the applicable minimum wage. This suggests a potential lack of awareness of minimum wage standards or misunderstanding of the survey question. SGCL will address this through targeted education and engagement.
- **Payslips:** 25% of respondents reported not issuing payslips to workers. SGCL recognises this as a governance gap and will support suppliers to improve payroll transparency.
- **Equal remuneration:** 25% of respondents indicated that workers may not receive equal pay regardless of gender or village, highlighting a need for further clarification and awareness-raising around non-discrimination principles.
- **Working conditions:** One respondent reported lack of access to clean drinking water, and three respondents reported lack of access to toilet and washing facilities. Upon investigation, these responses related to general living conditions within local villages rather than conditions provided by the supplier, contractor, or the Simberi Operation. The Simberi Operation provides access to drinking water, toilets, and washing facilities for all contractors and employees while on site. Simberi Operation also works with local villages to ensure access to drinking water but this access is not to individual homes.
- **Freedom of movement:** Three landowner suppliers reported that workers cannot leave premises after hours, and one reported deductions for cash advances. Initial investigations indicate these responses relate to workers residing in Fly-In Fly-Out style accommodation, where movement restrictions are applied for health and safety purposes during rostered work periods. Workers are free to leave once their roster is completed. These matters will be further reviewed to ensure no increased risk of modern slavery.
- **Food security:** No concerns were raised regarding food provided at the Simberi Operation.
- **Grievance mechanisms:** 37% of respondents reported that they do not have a grievance mechanism in place. SGCL considers access to grievance processes a key control and will prioritise support in this area.
- **Retaliation and forced labour:** All respondents stated that workers are protected from retaliation and reported no indicators of forced labour.
- **Training:** While all respondents indicated that management had received modern slavery training, only 25% of respondents reported that a portion of their workforce had received training. The most commonly requested training topics were labour rights and grievance processes.
- **Discrimination:** One respondent indicated that their workplace was not free from discrimination, although no incidents were reported. This will be monitored through ongoing engagement.
- **Capacity building:** 87% of respondents expressed a desire for support from SGCL to develop policies, indicating strong willingness to improve governance and labour practices.

SGCL acknowledges that several responses indicate gaps in understanding, governance capability and formal labour practices among local village suppliers. In response, SGCL will prioritise:

- Increasing supplier engagement and survey participation;
- Providing targeted training on labour rights, grievance mechanisms, and minimum wage awareness;
- Supporting suppliers to develop basic policies and procedures; and
- Conducting follow-up investigations where potential risks have been identified

6.2. Monitoring reports of modern slavery through formal and informal processes

No incidents were reported in the reporting period through the anonymous whistleblower hotline available.

The Company notes however that this may also be an indication that workers are uncomfortable reporting any incidences of exploitation and so building confidence in the hotline is essential.

6.3. Obtaining feedback from our employees, suppliers and their workers.

A Simberi focused Workplace Consultative Committee raises employment related concerns, provides feedback on employment matters and provides employee and engagement improvement opportunities to speak directly to Simberi Management.

6.4. Assessing the effectiveness of wage reviews and payment accuracy

The annual review process of salary/wages against minimum wage as well as fortnightly pay run approval process to ensure subject matter experts review for an adequate segregation of duties.

7. Consultation with Subsidiary Companies

The St Barbara Modern Slavery Statement is a joint statement on behalf of itself and all of its wholly owned subsidiaries (the reporting entity) after a process of consultation. The Simberi leadership team, procurement and community relations team were engaged on matters specific to the Simberi operation. Consultation was undertaken with key Group executives including key areas of the business (human resources, legal, company secretariat and procurement).

8. Commitments

St Barbara is committed to continually developing and improving the effectiveness of the actions we are taking to assess and address modern slavery risks. The evaluation of effectiveness is vital.



8.1.1. FY25 Commitments Progress

FY25 Commitments	Measure	Progress Status
1. Work with landowner suppliers on governance, in particular assisting with the development of the following templated policies for their adoption: <ul style="list-style-type: none"> Recruitment policy Safety Policy Code of conduct Safety controls Modern Slavery Policy 	Landowner governance toolkits developed and contractually mandated where landowners do not have policies in place.	● Suppliers that did not have their own policies have adopted St Barbara's policies. Supplier training commenced in 2025, with further training scheduled for early 2026.
2. Provide information and/or training to all landowner suppliers on modern slavery (including minimum wage).	Training module and/or information developed and distributed.	● Modern slavery information and training will be delivered in conjunction with St Barbara policy awareness initiatives.
3. Review due diligence survey methodology to increase effectiveness in the eradication of modern slavery.	Increased insightfulness from survey results informing tangible commitments in the following financial year.	✓ Completed.
4. Review agencies used to recruit workers engaged directly by us to ensure ethical recruitment practices and they are prohibited from presenting candidates without their knowledge, accepting any payments from candidates, providing or facilitating any loans to candidates, charging candidates any other costs that must be reimbursed without such costs being disclosed to us, and unlawfully discriminating against candidates	Establish protocol for vetting recruitment agencies including relevant questionnaire.	✓ Completed. Agency has provided Modern Slavery Statements and report under Modern Slavery laws in Australia.
5. Audit at least 1 x landowner supplier to ensure compliance with their own policies and procedures and other procedures to prevent modern slavery.	Fulsome audit of 1 x landowner supplier to identify required corrective actions	✓ Completed.
6. Establish due diligence checklist and policy expectations for suppliers of unskilled labour, particularly local landowner organisations.	Establishment of due diligence checklist and template policies.	✓ Completed.

8.1.2. FY26 Commitments

FY26 Commitments	Measure
1. Work with landowner suppliers on governance, in particular assisting with the development of the following templated policies for their adoption: <ul style="list-style-type: none"> Recruitment policy Safety Policy Code of conduct Safety controls Modern Slavery Policy 	Landowner governance toolkits developed and contractually mandated where landowners do not have policies in place.
2. Provide information and/or training to all landowner suppliers on modern slavery (including minimum wage).	Training module and/or information developed and distributed. Include Modern Slavery Concepts/Requirements into new Vendor onboarding for local contractors. Include Modern Slavery section in Contractor Review meeting scorecards.
3. Implement and monitor modern slavery and ethical recruitment clauses in recruitment agency contracts, including prohibitions on worker-paid fees and repayment obligations.	All Simberi recruitment agency contracts include modern slavery and ethical recruitment clauses, with compliance monitoring and escalation processes documented.



FY26 Commitments	Measure
<p>4. Audit at least 1 x landowner supplier to ensure compliance with their own policies and procedures and other procedures to prevent modern slavery.</p> <p>Partner with landowner suppliers to develop remediation plans based on audit findings to assist in the reduction of audit findings in FY27 and beyond.</p>	<p>Completion of risk-based audits of selected landowner suppliers and documented remediation plans developed and tracked for identified findings.</p>
<p>5. 100% of landowner suppliers have a representative attend a training session on modern slavery and how to implement grievance framework.</p> <p>100% of landowner suppliers have a representative that attend a training on minimum wages, and obligations for employers in PNG (payslips, equal pay regardless of gender or village, recruitment methods etc.).</p> <p>90% of SGCL employees and contractors attend modern slavery awareness training.</p>	<p>Attendees</p>
<p>6. >80% of landowner suppliers complete the modern slavery survey.</p> <p>Review Landowner Modern Slavery survey methodology to increase quality of insights and understanding of modern slavery risk.</p>	<p>% Surveys completed</p> <p>Quality of data insights</p>
<p>7. Survey responses regarding access to water, toilets, washing facilities within their villages, contractors not being able to leave premises after hours, recruitment practices subject to coercion being investigated for context and appropriate remediations are actioned.</p>	<p>Investigations completed.</p> <p>Remediations implemented.</p>

9. Conclusion

Modern slavery is a global challenge that requires collective effort. At St Barbara, we are strongly committed to playing our part in eradicating and removing such practices from our operations and supply chain wherever they might exist. We will be focused on making commitments that create real change in our highest areas of risk. We urge our stakeholders to support us in this endeavour.

Our values

We act with honesty and integrity

We treat people with respect

We value working together

We deliver to promise

We strive to do better

