Inspired people creating a premier global gold company **Evolution**MINING Modern Slavery Statement 2024

We acknowledge our First Nation partners and Indigenous peoples and communities throughout Australia and Canada and recognise their continuing connection to land, waters and community. We pay our respects to them and their cultures, and to Elders past and present. We acknowledge the Elders for their resilience to pave the way for the generations that follow them, and we acknowledge those who continue to educate and empower to maintain and protect all aspects of Indigenous and First Nation heritage and culture.



## **About this Statement**

Evolution Mining Limited (Evolution or Company) (ABN: 74 084 669 036) is an Australian public company listed on the Australian Stock Exchange (ASX: EVN). The Company is registered at Level 24, 175 Liverpool Street, Sydney, New South Wales, Australia.

This Modern Slavery Statement (Statement) describes the steps taken by Evolution to identify, address, mitigate and remediate modern slavery risks in our operations and supply chains. It is published in accordance with and pursuant to s13 of the Australian Modern Slavery Act 2018 (Cth) (MSA or Australian Act) for the financial year ending 30 June 2024 (FY24) for all operations, excluding the newly acquired Northparkes operation (Evolution Mining (Northparkes) Pty Ltd (ACN 164 997 317) (formerly named CMOC Mining Pty Limited)) which covers the period 1 January 2023 to 30 June 2024!

This Statement is also published in accordance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c.9) (the Canadian Act) for FY24. References to 'Modern Slavery' throughout this Report include 'Modern Slavery' as defined under the Australian Act, and 'Forced Labour' and 'Child Labour' as defined under the Canadian Act.

This is a joint Statement covering the activities of all Australian and Canadian entities within the Evolution Group structure<sup>2</sup>. Each entity is covered by Evolution's policies, procedures and systems, including those relating to contracting, purchasing and human resources.

The risks and impacts associated with Modern Slavery in projects in which we do not operate are not included in this report. We regularly engage with joint venture partners and operators on key issues affecting project outcomes, including human rights, forced labour and child labour<sup>3</sup>.

This Statement was approved by Evolution's governing Board of Directors in November 2024.

We welcome and value feedback. Please direct your feedback and enquiries to Vice President Sustainability, Fiona Murfitt at esgreporting@evolutionmining.com

# Reporting obligations

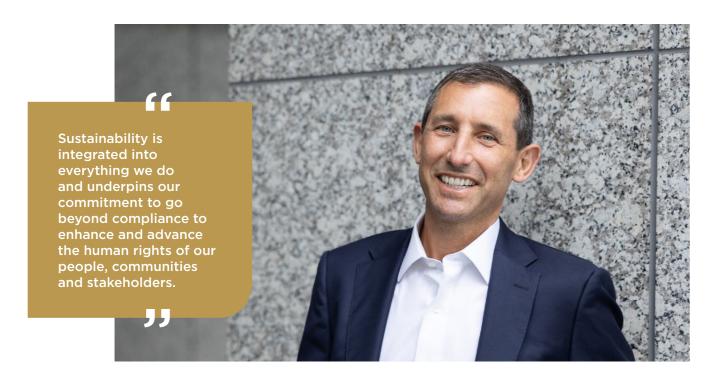
This Statement was prepared to meet the mandatory reporting criteria set out under s16(1) of the Australian Act and s11(3) and (5) of the Canadian Act as summarised below.

Reporting requirement	Australian	Canadian	Page
Identifying the reporting entity	s16(1)a		1
Attestation from the Executive Chair		s11(5)	2
Entity's structure, operations, activities and supply chains	s16(1)b	s11(3)a	3
Entity's policies and due diligence processes in relation to forced and child labour		S11(3)b	6
Risks of modern slavery practices in the operations and supply chains and the steps taken to assess and manage that risk	s16(1)c	s11(3)c	13
Actions taken to assess, prevent, reduce and address those risks, including remediation measures and processes	s16(1)d	s11(3)d	15
Measures taken to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour or child labour in activities and supply chains		S11(3)e	18
Training provided to employees on forced labour and child labour		s11(3)f	11
Assessment of the effectiveness of these actions to ensure that modern slavery, forced labour and child labour are not being used in the business and supply chains	s16(1)e	s11(3)g	18
Consultation with any entities that the reporting entity owns or controls	s16(1)f		18, 19
Other relevant information	s16(1)g		3, 4, 6, 10

As of 30 June 2024, Evolution operated five wholly-owned mines and an 80% interest in the Northparkes mine acquired in December 2023. Prior to acquisition, Northparkes developed Statements for the calendar year. For integration purposes and following formal confirmation from the Australian Attorney General's Department, this Evolution 2024 Statement incorporates the newly acquired Northparkes, including their activities covering the 18-month period between 1 January 2023 and 30 June 2024.
 See Evolution's 2024 Annual Report for a listing of all entities.

<sup>3</sup> The minority participating interests in the Northparkes Joint Venture are held by Sumitomo Metal Mining Oceania Pty Ltd (13.3%) and SC Mineral Resources Pty Ltd (6.7%) (collectively Sumitomo). This is not a supporting statement for Sumitomo.

## **Executive Chair's letter**



On behalf of the Evolution Board of Directors, I am pleased to release Evolution's fifth Modern Slavery Statement, outlining our actions to assess and mitigate the risk of modern slavery within our business and supply chains.

Sustainability is integrated into everything we do and underpins our commitment to go beyond compliance to enhance and advance the human rights of our people, communities and stakeholders. We have zero tolerance for any activities that may cause or contribute to modern slavery and believe it is everybody's responsibility to address and eradicate modern slavery. We acknowledge the risks are complex and evolving and we aspire to continue to mature in our risk management.

Throughout FY24, Evolution implemented a risk-based approach to integrate the Canadian Act and Northparkes acquisition into our processes. We have pursued year-on-year improvements that seek to develop a closer understanding of our supply chains. This has enabled us to strengthen our procurement processes and responses for reducing potential modern slavery, human rights and exploitation risks throughout the life cycle of our mining operations.

Through partnerships, including the United Nations Global Compact (UNGC), we continue to pursue knowledge sharing and development amongst ourselves and our suppliers. We commit to minimising negative impacts, promoting positive legacies and transparent reporting.

#### Attestation

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting periods listed above.

I have the authority to bind Evolution Mining Limited.

Jake Klein **Executive Chair** 20 November 2024

Our commitment to international standards and collaboration



We commit to internationally recognised human rights frameworks, standards and goals including:

- UN Guiding Principles on Business and Human Rights (UNGPs)
- UN Sustainable Development Goals (UNSDGs)
- UN Declaration on the Rights of Indigenous Peoples (UNDRIP) via the principle of Free, Prior and Informed Consent (FPIC)
- Global Reporting Initiative (GRI)



## We are signatories to the following

• UNGC - encourages businesses to adopt and report on the implementation of sustainable and socially responsible policies



We engage with other organisations to improve understanding and develop ideas to manage modern slavery risk, including:

- UNGC Network Australia's (UNGCNA) Modern Slavery Community of Practice, and Australian Dialogue on Business and Human Rights
- · Monash University (engagement on their ASX100 Modern Slavery Statement Disclosure Quality Ratings Research Report)
- Australian Council of Superannuation Investors (ACSI) (ongoing engagement on their review of modern slavery reporting for ASX200 companies)
- Environmental, Social and Governance (ESG) agencies, including S&P Global, MSCI, ISS ESG and Sustainalytics

# Our structure, operations, activities and supply chain

### Our structure, operations and activities

Evolution was formed in November 2011 and has become a leading, globally relevant gold mining company. Evolution currently operates six mines in Australia and Canada, with Northparkes (80% ownership) acquired in December 2023. Our operations manage risk guided by our accompanying purpose, vision, values and strategy.

In FY24, Evolution produced 716,700 ounces of gold at an All-in Sustaining Cost (AISC) of \$1,477 per ounce4, continuing to position Evolution as a low-cost global producer that creates value for its stakeholders in a socially and environmentally responsible way. Read our 2024 Annual and Sustainability Report for more information.

Evolution operations and First Nation partners<sup>5</sup>

We have made a strategic decision to manage our geopolitical and human rights risk by growing and operating in the Tier 1 jurisdictions of Australia and Canada. While mining has been identified by the Walk Free Foundation's Global Slavery Index (GSI) as a sector most at risk of modern slavery, the industry in Australia and Canada is not considered to be high-risk.

We have no exposure to artisanal and small-scale mining, nor conflict-affected and high-risk areas, in proximity to our existing and exploratory operations, contributing to our mitigation of human rights impacts. We do acknowledge there is still the potential risk of modern slavery occurring within our business and supply chains, and as such, we have robust mechanisms in place to identify, assess and address this risk, as detailed in this Statement.

Statutory net profit after tax

FY24 Operating mine cash flow \$1.541M

Dividends declared

#### Ernest Henry Mitakoodi people Red Lake Treaty 3 lands of the Wabauskang and Lac Seul First Nations and other knowledge holders Mt Rawdon Australia Bailai, Gurang, Gooreng Gooreng and Taribelang Bunda peoples 717koz Gold production Production December 2023 Mineral Resources<sup>6</sup> Northparkes December 2023 Ore Reserves<sup>6</sup> 11.4Moz gold, 1.3Mt copper Wiradiuri people Mungari of the Upper Bogan River AISC \$1,477/oz7 (US\$975/oz)8

4 Currency is expressed in Australian dollars unless otherwise stated.

Marlinyu Ghoorlie

people and other

knowledge holders

5 Cowal (ABN 75 007 857 598), Ernest Henry (ABN 18 008 495 574), Mt Rawdon (ABN 77 152 727 663), Mungari (ABN 90 002 124 745), Northparkes (ABN 17 164 997 317), and Red Lake (OCN 5054815).

Wiradjuri people

Cowal

- 6 As at 31 December 2023 and compared to the 31 December 2022 estimates. See the Mineral Resources and Ore Reserve section of the Annual Report for further information.
- 7 All-in Sustaining Cost includes C1 cash cost, plus royalties, sustaining capital, general corporate and administration expenses on a per ounce sold basis
- 8 Calculated using an average AUD:USD exchange rate of 0.66 for the 12 months of FY24.

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#### Our purpose

To deliver long-term stakeholder value through low-cost production in a safe, environmentally and socially responsible way

#### Our vision

global gold company

#### Our values

Our values guide our behaviours and the decisions we make in the workplace every day: safety excellence, accountability and respect



### Safety

Think before we act, every job, everyday



#### Excellence

We take pride in our work, deliver our best and always strive to improve



## Accountability

It is my responsibility, I own it - good or bad



### Respect

We trust each other, act honestly and consider each other's opinions

### Our strategy

Since the formation of Evolution in November 2011, we have had a consistent strategy. To create a business that prospers through the cycle, we:

Integrate sustainability into everything we do

Drive a high-performing culture with values and non-negotiables

Take appropriate operational and financial risks

Build a portfolio of up to eight assets in Tier 1 jurisdictions generating superior returns

Have financial discipline centred around margin

#### Our workforce

As at 30 June 2024, our workforce comprised 5,796 people, of which 3,101 were employees and 2,725 were contractors or labour hire. Overall, 19% of our employees identified as female and ~7% identified as Indigenous. For more information, refer to our 2024 Annual Report, ESG Performance Data, and website.



#### Workforce breakdown<sup>5</sup>

53.2% Employees

Contractors and Labour hire



#### Coverage under collective bargaining agreements

22.0%

% Covered

% Not covered



## Employee age breakdown

35.3%

< 36 years

50.0% 36 - 55 years

14.7%

> 55 years



#### Employee gender breakdown

80.9% Total male

19% Total female

0.1% Total Other



#### Employee type breakdown

92.2% Total permanent full-time

1.2%

Total part-time

0.3% Total flexible

4.6%

Total fixed term

1.7% Total casual



#### **Employee level** breakdown

27.7%

Professionals/Supervisors

63.9% Operations

0.3% Board

0.9%

7.3%

Senior Leaders

Managers/Superintendents

#### Our value chain



#### Exploration and Discovery

- · Drilling contractors
- Geology and geophysical contractors
- · Analytical laboratories
- · Health and safety specialists
- Surveying
- · Earthmoving contractors
- Environmental and water consultants

As a major producer and consumer within our

communities, all reasonable

opportunities are taken to be

sustainable in how and where

our goods and services are

sourced. Our Supply teams

procurement activity across

the end-to-end procurement life cycle, ensuring sourcing is

undertaken in accordance with

Procurement is outlined below.

In FY24, our supply chain comprised

4,569 active suppliers, with a total

procurement spend of ~\$2 billion10,

a 7% increase since FY23. We spent

\$419 million directly with local and

procurement since FY23. The increase

and Indigenous procurement focus in

our acquisition and project activities.

understanding and strengthening our

supply chains within closer reach to

and influence on our operations and

communities. See an example in our

is partly attributable to a local, regional

regional suppliers, representing

a significant increase in local

We recognise the opportunity

case study here.

for lower modern slavery risk by

our policies and procedures.

Our approach to Sustainable

manage and coordinate



### Support services

- Site accommodation management services
- Power, communication and IT services
- Insurance
- · Employee benefits
- · Personal protective equipment (PPE) and personal protective clothing (PPC)
- · Legal and specialist support
- Medical health and safety services
- · Labour supply
- · Water and waste management



# Mining

Mining and haulage

contractors, plant

Cement and ground

and equipment

support supply

Explosives supply

Fleet, maintenance,

· Fuel, oil and tyre

Blasting software

and consultants

communication

Geotechnical

services

parts and equipment

and blasting

services

supply

Mining

Processing

# **点曲**,

- Operations and · Freight services maintenance
- · Port services Supply of grinding
- media flocculants Shipping Chemicals and
- reagents supply · Laboratory services
- · Civil contractors

contractors

· Fuel and gas supply

Transportation

- Haulage services
- Stevedoring
- · Bus services
- Air charter
- services
- · Travel service

By integrating Northparkes and their risk and value-based market engagement and assessment, we enriched our focus on local and regional procurement. Overall, the majority (98%) of

Evolution's direct (Tier 1) suppliers are based in Australia (90%) and Canada (8%) with 2% of the supply chain operating outside of these jurisdictions (United States of America, United Kingdom, France, Switzerland, Denmark, Netherlands, Norway, Croatia, Israel, Hong Kong, Singapore, China, Malaysia, Thailand, Taiwan, Japan, New Zealand, and South Africa). We recognise however that some of our direct suppliers have operations or engage subcontractors (Tier 2 and beyond) in other jurisdictions and that this risk can be complex and must be managed and reported.

We also recognise the diversity in scale, goods and services across our supply chain and that lower spend does not equate to lower risk. We continue to bring alignment to the methodologies across spend categories and our operations regardless of the spend profile. The following graphic reflects our largest supply spend by category.



### Top 10 supplier spend by category

36% Contractors (excl. mechanical)

Mechanical spares

13%

Electricity 11%

Maintenance consumables

7%

Selling, refining and logistics

6% Diesel

4%

Reagents (excl. cyanide)

3% Explosives

Grinding media

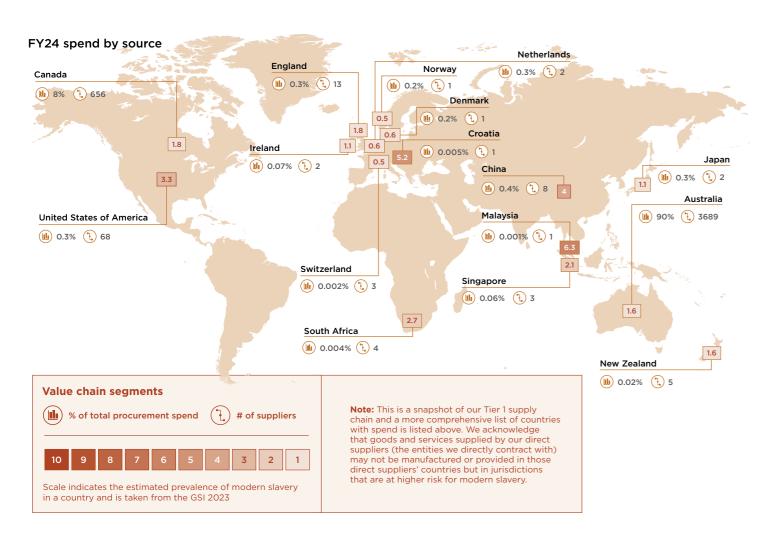
3%

Cvanide

10 This figure reflects supplier payments only and excludes wages, dividend payments, interest, taxes royalties, and community

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<sup>9</sup> The methodology and definition of contractors continue to be improved at Evolution. To date, each operation provides figures each financial year for contractors, associated hours and work schedules Averages are applied and endorsed at the Group level



# Our policies and due diligence mechanisms

Evolution maintains a zero-tolerance approach towards any form of modern slavery and takes reasonable efforts to manage the risk of modern slavery to groups at risk. During FY24, we continued to apply a rigorous methodology to manage modern slavery risks, including increased measures with our medium to high-risk suppliers.

We maintain a comprehensive risk-based supplier due diligence framework for identifying and managing the risks associated with our suppliers, including selection, onboarding, and monitoring through to corrective actions and disengagement.

A variety of tools are used to assist us in our due diligence processes. These may include onsite inspections, obtaining information from third-party sources including authorities, international organisations and civil society, and consulting experts and technical literature. This is governed by our Sustainability approach, Principles and Material topics.

#### Sustainability approach and Principles

Evolution has adopted nine Sustainability Principles as the foundation for how we approach and integrate Sustainability into everything we do. These Principles align with the UNGC, and UNSDGs that have been prioritised for our business, and support our efforts to continuously improve and mature in our focus on human rights.

Evolution is a proud signatory of the UNGC and align our Sustainability approach with the Ten Principles. The data within our 2024 Annual and Sustainability Report with reference to the UNSDGs, UNGP and UNGC demonstrates Evolution's commitment to delivering economic benefits to all stakeholders in a socially responsible way.

#### **Defining our Material topics**

Our triennial independent materiality assessment was conducted in FY24 aligned with the GRI 3: Material Topics 2021 and GRI 14: Mining Sector 2024 to analyse Evolution's key sustainability topics. The four-step process included an in-depth desktop study of a range of internal and external inputs, review of our salient risks, interviews with key stakeholders and an online survey supported by our FY24 biennial Stakeholder Perception Survey. The survey provided opportunities to understand worker and contractor voice as it was distributed to a broad stakeholder mix, comprising community, education and government organisations, landholders/local residents, local businesses and suppliers, First Nation partner organisations, employees and others. It identified the most important ESG issues for Evolution and its external and internal stakeholders (i.e., double materiality), including Modern Slavery and Human Rights.

Our complete materiality matrix is presented next and further information on the Material topics can be found in our 2024 Annual Report.

#### Evolution's Sustainability Principles and Sustainability Strategy - Integrated into everything we do



#### Double materiality matrix



Influence on stakeholder impacts and decisions

(i.e. Importance to stakeholders / stakeholder materiality)

Priority 1 (Business critical), Priority 2 (Extremely important), Priority 3 (Highly important), and Priority 4 (Important)

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#### Policies, standards and guidelines

Evolution has several policies, standards, and guidelines in place that apply to all entities owned and controlled by Evolution. They outline our minimum expectations, requirements and approach to modern slavery and human rights all of which are approved by the Board or subcommittees.

There are ongoing processes of integration following the acquisition of Northparkes. We have transitioned all policies, and are in the process of consolidating, replacing and/or updating standards, procedures and due diligence mechanisms<sup>11</sup> across Evolution to ensure their consistent application supporting continuous improvement and review, and risk mitigation and management.

Document	How it addresses modern slavery
Sustainability and Strategic Planning Policy	Embedded in our decision-making at all levels of the organisation. It sets out our commitments across health, safety, environment, operational risk, security and social responsibility.
	Includes commitments to respect the human rights of our stakeholders, manage modern slavery risks and provide a healthy, safe, and inclusive workspace that encourages our people to eliminate, avoid, and report unsafe situations. It also outlines requirements for regular reviews and continuous improvement.
Sustainability Performance and Strategic Planning Standards	Prescribe the minimum performance management that is to be achieved across our operations regarding health, safety, environment and social responsibility.
	Our Human Rights and Modern Slavery Standard defines the minimum requirements in relation to respecting and mitigating potential risks associated with Human Rights and Modern Slavery, upholdin the fundamental rights and dignity of all our stakeholders, including the protection of groups at risk.
	These standards are being reviewed and updated in FY25.
Code of Conduct	Sets the standards for our people to act ethically, responsibly and lawfully. It applies to Directors, all employees, contractors, and consultants employed to undertake work on behalf of, or for Evolution and its subsidiaries in the course of their duties. It guides us in meeting ethical standards and legal requirements, and all employees complete training to understand its requirements, including regardin human rights.
Procurement Statement	Provides the framework under which the Company sustainably procures goods and services. It is aligned with our values, Code of Conduct, and Supplier Code of Conduct and considers various ESG factors that are integrated into our market engagement and procurement activities and vendor onboarding process.
	It highlights our commitment to partnering with suppliers who can demonstrate high standards of ethical business conduct, including respect for human rights including modern slavery, rights to life and liberty and security of persons in supply chains.
Supplier Code of Conduct	Communicates the expectations and minimum standards for our suppliers with regard to ESG risks and impacts, including complying with all applicable legislation in relation to employment practices and respecting and protecting human rights. Our suppliers are expected to uphold the same standard approach towards human rights as Evolution.
Whistleblower Policy and Standard	Outlines the framework that has been established for individuals to raise concerns on potential or actual unacceptable conduct in relation to human rights and modern slavery. It includes the defined elements of independent reporting and investigation procedures, disclosure protection and the associated corporate governance. They are communicated regularly to employees and contractors via onboarding, the Code of Conduct, People and Culture department and intranet.
Modern Slavery Business Guide (internal)	Incorporated into our governance processes and is designed to assist Evolution personnel, including Site Leadership Teams, Managers, Superintendents, Supervisors and Supply teams, in assessing the risk of modern slavery in our supply chains, and understanding the steps being taken by Evolution to mitigate the risk and the actions required to provide assurance that our business is free from modern slavery.
	It provides an internal escalation process from when potential modern slavery issues have been identified in our supply chain through to notification at the senior executive level. It includes a risk-based process to assess, report and where required, take action to address the risk of modern slavery occurring in our business operations and supply chain.
Northparkes Modern Slavery Remediation Procedure (internal)	Details the process and actions that must be followed in response to any potential or actual incidents of modern slavery whether reported through the whistleblower hotline or other mechanisms, to remediate harm to workers and prevent recurrences. There were no reported incidences in the 2023 reporting period requiring enacting this procedure.

#### Supplier contracts and market engagements

We establish minimum expectations for human rights via our contracting process and market engagement practices with our suppliers. A supplier's positive sustainability and human rights-related performance is a contributing factor in awarding contracts. Modern slavery provisions have been incorporated in our procurement contracts and vendor trading terms for the supply of goods and services, which:

- Prohibit modern slavery practices by the contractor or its subcontractors
- Provide Evolution with the right to audit and terminate the contract
- Mandate the inclusion of similar provisions in contractors' supply activities, thus cascading the provisions down through the supply chain

We require that our suppliers have zero tolerance for any form of modern slavery, forced labour or child labour in their operations and supply chains (as defined by the International Labour Organisation).

Our contracts with Tier 1 suppliers require compliance with stringent Sustainability criteria and the modern slavery provisions. They must also adhere to our policies and procedures when working on site. Compliance and performance are monitored through regular supplier relationship management (SRM) meetings, ad hoc deep dive sessions, and key performance indicator (KPI) reporting.

Market engagements are issued through our tender management platform and require strict adherence to our Supplier Code of Conduct. Tender questions are provided to potential suppliers for completion which are then reviewed and scored. These questions are designed around our Supplier Code of Conduct with the aim of providing insight into the ESG practices of potential suppliers, assess their organisational fit with our business, values and expectations, and include elements of our Modern Slavery Supplier Assessment Questionnaire (SAQ).

In FY24, our Northparkes market engagement has taken a risk-based approach to leverage both value and promote business standards. Procurement and vendor management procedures have incorporated due diligence, including global vendor risk and reputation screening, and health and safety pre-qualification procedures. The procedures have allowed Northparkes to monitor suppliers for organisational risks with a focus on areas that pose higher risks.

To enable the effective review of our contracts, we will continue to mature and collate multi-year data on our contracts. This includes non-compliance in commercial agreements with embedded Modern Slavery clauses, the scope and number of contracts, and continuing to assess whether the scope of control within our supply chain is increasing.

#### Supplier engagement

Formal and informal engagement, including deep dive sessions, onsite visits by our teams, surveys and structured meetings are key features of our engagement strategy, including:

- During pre-qualification, tendering or renewal processes of an existing contract, a formal risk assessment is conducted for all our suppliers.
- Risk assessments, where suppliers may be required to supply additional information.
- Possible further due diligence, with the use of third-party verification of supplied information.

These engagements provide valuable insights into the experience of workers and aim to validate information supplied. We set corrective actions from these engagements with findings used to improve future due diligence assessments for current and potential suppliers.

Evolution continues to build relationships and work with organisations to understand and address modern slavery risks across our shared supply chains, including through onsite or desktop deep dive sessions. These include further assessment of suppliers' governance, due diligence and improvement processes; increasing awareness and knowledge of our Tier 2 supply chains; and gaining a broader understanding of their approach to managing modern slavery risks within their businesses. Suppliers are identified to participate in accordance with the Australian Act's associated guidance notes, any previous incidents of modern slavery available in the public domain, or any risks identified in previous SAQ responses.

In FY23, we engaged in deep dives covering four of our high-risk categories, including PPE, fuel, grinding media, and chemicals. Those deep dive sessions have been used to further our understanding of our category risk, which will in turn focus deep dive efforts planned for the FY25 period, with particular attention to our top 10 risk categories.

As deeper knowledge is obtained through our supply chain, we also reserve the right to suspend, discontinue or terminate relationships with suppliers when we have a reason to suspect or can identify that the supplier:

- Is in breach of the law; and/or
- Refuses or fails to demonstrate reasonable and timely efforts to implement agreed corrective actions required to operate in accordance with our Supplier Code of Conduct.

#### Supplier Assessment Questionnaire

Further to the identification and management of modern slavery risk in our supply chain, we have collaborated with each of the operations to evaluate and rank our suppliers as 'Low', 'Medium' or 'High-Risk', based on the sector and industry, product and service, geographical, and entity risk areas, as well as the level of spend.

We issue an annual SAQ to the identified medium to highrisk suppliers, with questions developed to address modern slavery risk areas. Our methodology to evaluate and score these responses is based on specific metrics, such as the GSI's vulnerability scoring. In FY24, SAQ improvements were made to more closely evaluate our operations' and supply chain characteristics, including incorporating the new Canadian Act.

In FY24, we continued to work on the compliance requirement for high-risk suppliers to provide an SAQ. We also engaged with non-responding suppliers to understand reasons, e.g. accessibility issues, timing and resourcing, and support them to complete their response where applicable. Where suppliers did not provide a response, they were identified as non-compliant, with further analysis and follow-up plans developed. In this respect, we continue to improve our SAQ process, including mapping Tier 2 suppliers and beyond, with action plans for a continued lift in response rate.

#### Performance: SAQ

In FY24, we contacted 198 medium to high-risk suppliers to complete our Modern Slavery SAQ. ~62% completed the assessment (compared to 57% for FY23), with no actual modern slavery risks identified. Northparkes' responses comprised ~25% of the total suppliers contacted, using a methodology determined prior to acquisition, i.e., top fifty suppliers<sup>12</sup> by total purchase order value (and an assessment of stock items procured). For the remaining operations, SAQ distribution increased by ~18% (see more detail in the Communities section of our ESG Performance Data).

<sup>11</sup> Northparkes Mines Modern Slavery Policy; Code of Conduct; Health, Safety and Environment Policy; Procurement Policy; and Whistleblower Protections Procedure have been replaced by the Evolution Sustainability and Strategic Planning Policy and associated standards, Employee Code of Conduct, Supplier Code of Conduct, Procurement Statement, and Whistleblower Policy and Standard.

<sup>12.</sup> While Northparkes assesses the top fifty suppliers, the Northparkes Modern Slavery Questionnaire was issued to seven hundred suppliers by email in the reporting period. As at 30 June 2024, Northparkes had received 298 responses (42.6%). There will be ongoing engagement with non-responding suppliers.

#### Evolution operations, excluding Northparkes

Overall, the responses revealed our Tier 1 suppliers are in general alignment with the Australian and Canadian Acts; maintain whistleblowing mechanisms; have relevant policies and training in place; have established mechanisms to formally communicate relevant policies to the workforce; and there is Board oversight.

Further analysis<sup>13</sup> of our Tier 1 supplier responses has provided a deeper understanding of our modern slavery risk profile. Some key insights include:

## 79%

submitted that they operate within an industry deemed 'High risk'<sup>14</sup> for modern slavery.

## 80%

confirmed their alignment with requirements under the Australian and Canadian Acts, reaffirming our approach to operate within Tier 1 jurisdictions with robust governance systems.

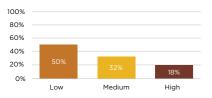
### Two

suppliers were found to not have a Modern Slavery Statement or similar, where considered necessary for the size of their organisation. This data will enable us to identify suppliers for focused deep dives moving forward.

## ~18%

of overall suppliers' geographic risk profile is in high-risk regions.

#### Supplier geographic risk profile15



100% of suppliers provided insight

into the regions where our Tier 2 supply chain extends by indicating if they sourced their goods or services from: Australia only; Africa, Asia or South America; Europe or North America; or a combination. The regional distribution enables further detailed analysis of risk profile and targeted actions moving forward.

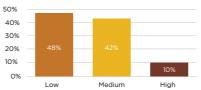
## ~49%

of Tier 2 goods or services sourced by our Tier 1 suppliers, regardless of spend level, come from regions such as Africa, Asia or South America. ~39% come from regions such as North America and Europe.

#### Northparkes

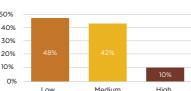
## 48%

of suppliers assessed using Northparkes' specific assessment methods were found to be low-risk for modern slavery and human rights risks. 42% were deemed to be medium-risk. Two mediumrisk suppliers were found to supply electrical components and PPE, considered high-risk products; one operated in a high-risk category, being a supplier of chemicals; and four sourced materials from countries with high prevalence of and vulnerability to modern slavery. These suppliers remain categorised as medium-risk taking a holistic view of their assessment. 10% were identified as high-risk. However, numerous high-risk suppliers had not completed the SAQ, reinforcing the need for focused efforts to further lift response rates.



Overall, the FY24 SAQ responses have enabled greater insights and opportunities for improvement in our SAQ methods and data collection. With the data received, we will continue to focus assessment of our medium to high-risk suppliers through further engagement and deep dives, to better understand the risks and how best to manage and mitigate them.

#### Northparkes specific results



# Case study

Learnings from the Northparkes due diligence and integration

In FY24, modern slavery and human rights risk considerations were embedded through the Northparkes acquisition due diligence and asset integration processes. The integration process demonstrated the importance of understanding this Material risk to the business from the earliest stages of the mine life cycle, with oversight by the Board and Leadership Team.

The integrated approach directly led by the Sustainability, Supply and Legal disciplines opened opportunities to enhance understanding of the operation's modern slavery risk profile for the respective supply chains and locations. A specific cross-functional working group was established for this purpose, working in a manner that ensured information sharing and cross-learning was captured between the organisations. The working group was able to quickly and effectively review and bring focus to important organisational policies, standards and procedures, with the aim of improving our reach and positive influence through the supply chain. Several Northparkes processes for supplier engagement and assessment were identified to help lift and strengthen Evolution's overall position. Collectively, specific improvements were realised through sharing detailed approaches, governance and oversight structure, supplier questionnaire and data collection methods, internal training materials, market engagement and contract mechanisms. The working group has now been further formalised into the enterprise-wide Modern Slavery Community of Practice (CoP), with scope to support, embed and communicate ongoing improvement plans.

#### Education and training

Human rights awareness education and training is provided for all our employees. This includes how to identify actual or potential risks of modern slavery within our business and supply chains, and the process of escalation. This is provided through:

- Open discussions on modern slavery encouraged and informed by the Modern Slavery Business Guide.
- Interactive online training through our training platform (INX), consisting of both basic induction training and more detailed modern slavery training for employees who have direct responsibility for supply chain management.
- Face-to-face training sessions for these employees who have direct responsibility.
- Modern Slavery CoP attendance and capability development at education sessions with external providers, e.g. the UNGCNA's Modern Slavery Community of Practice and Australian Dialogue on Business and Human Rights.
- In FY24, 92 of our employees completed targeted mandatory modern slavery training, tailored for their roles and associated direct responsibilities and exposure to the supply chain. For example, the Site Leadership Team, Superintendents (Commercial, Finance and People and Culture), Contractor Administrators, the Supply and People and Culture teams.

Aligned with the Australian Act requirements, the training covered the following topics:

- · What is modern slavery?
- How to identify and report modern slavery?
- The basic principles of the Australian Act.
- · Our internal policies and procedures for identifying, mitigating, and responding to modern slavery risk.

Throughout FY24, we commenced updating our training to integrate the Northparkes and incorporate Canadian Act requirements. These updates complement our FY23 formal training effectiveness review which emphasised the value of more targeted, detailed training for personnel with specific supply chain exposure. We will continue to provide the general induction online training to all new Evolution employees while offering the targeted modern slavery training. This will better equip our personnel to identify, report and seek external assistance where there is evidence of modern slavery present or likely to be present in our operations and supply chains. Further opportunities to ensure relevance and continuous improvement of our training materials will be reviewed including the integration of additional international frameworks, validation and guidance from independent experts, and increasing visibility of data including for Tier 2 (and beyond) suppliers for building broader awareness and influence on the risks.

#### Audits

Audits are regularly undertaken to assess compliance against our Human Rights and Modern Slavery Performance Standard. These are included in the Group Assurance Program, with material actions externally validated annually by an independent auditor. Findings from the last Line of Defence (LOD) 2<sup>16</sup> audit identified areas for improvement across the Sustainability portfolio, but no material findings.

In FY24, no incidents or violations of human rights or modern slavery, including the rights of Indigenous peoples, freedom of association, child labour, youth labour with exposure to high-risk work, or forced labour involving our employees were recorded. Ongoing risk mitigation, process review, measurement and assessment will continue.

#### Collaboration and engagement

Effective management and mitigation of modern slavery and human rights risk is strengthened through collaboration. Evolution welcomes increased collaboration with peers, both formal and informal, to deepen understanding of the industry's challenges in addressing, mitigating, and remedying modern slavery.

As a signatory to the UNGC, we report annually on progress towards the implementation of the principles, which include human rights. We are also an active participant in the UNGCNA and a member of UNGCNA's Modern Slavery Community of Practice. It aims to support companies working together to solve problems, share knowledge, develop best practices, and foster innovation.

Evolution is a member of PASA (Procurement and Supply Australasia), a leading provider of information and education to procurement and supply professionals throughout Australia and New Zealand. This includes membership to PASA Connect which facilitates various round table and information sharing sessions led by subject matter experts, including on modern slavery and human

<sup>13</sup> We are pursuing year-on-year improvements in our data validity and accuracy to enable improved analysis. Suppliers fill in the SAQ and Evolution assesses the responses provided. The questions provided, suppliers' interpretation, as well as survey functionality may allow for duplicated or multiple responses per question, requiring further review and normalisation of the data.

<sup>14 &#</sup>x27;High risk' is defined as per the GSI, Attorney General's Department Modern Slavery Infographic, as well as ACSI's Modern Slavery Risks, Rights &

<sup>15</sup> Suppliers can operate in multiple locations. Data has been normalised.

Program, LOD2 involves the Management System and Standards Audit, and LOD3 involves external assurance.

rights. Members can build relationships with peers and explore solutions to current challenges, gain exposure to new ideas and practices, and benchmark our capabilities.

We remain committed to engaging with our internal and external partners, such as ACSI and other suppliers through our SRMs, to gain feedback and facilitate continuous improvement. Throughout the year, we have regularly sought stakeholder feedback including through:

- Employee engagement surveys such as Your Voice
- Suppliers' direct dealings with our supply teams
- Direct discussions and feedback sessions with subject matter experts (e.g., ACSI)
- Conversations with key investors on the Company's strategy and performance, specifically related to sustainability and human rights
- Periodic independent third-party audits of the adequacy and effectiveness of policies, management plans and procedures (e.g., Northparkes undertaken FY23)

#### Complaints and grievance mechanisms

Grievance mechanisms and whistleblower frameworks are implemented for all stakeholders at each operation across our organisation to express any concerns, issues, or grievances about real or perceived actions. The framework includes a Whistleblower Policy and confidential reporting

mechanisms for anyone to confidentially raise concerns, including on human rights and modern slavery. They are reported as an agenda item to the Board Risk and Sustainability Committee, who have Board delegated responsibility for modern slavery risk matters.

We review the effectiveness of our grievance mechanisms with reference to various frameworks, including our Sustainability Performance Standards and the UNGP's Principle 31 'Effectiveness criteria for non-judicial grievance mechanisms'.

In FY24, aligned with our Standards, all sites reported, investigated and responded to complaints and grievances with a process that is transparent and based on engagement through dialogue, with outcomes that must be fair and unbiased.

There were no whistleblower reports or other complaints relating to actual or threatened modern slavery or other human rights abuses in the Company or our supply chain (including Northparkes). During the reporting period, we transitioned Northparkes from the 'SpeakUp' Whistleblower program to the FairCall (KPMG) service. We continue to encourage all stakeholders, employees and business partners to provide feedback and raise concerns through these frameworks, and informal reporting mechanisms via Management, and the Sustainability and People and Culture teams.

#### **Evolution's response to the UNGP's Effectiveness Criteria**

Effectiveness criteria	Example of Evolution's response
a. Legitimate	<ul> <li>Operated by forensic professionals, KPMG's FairCall whistleblower reporting service is a proven, confidential and anonymous way for employees and third parties to report suspected fraud and misconduct. The FairCall hotline can also be used to report suspected bullying, harassment and other inappropriate behaviour.</li> </ul>
	<ul> <li>The Whistleblower Policy and Standard, and Code of Conduct outline the purpose of the grievance mechanisms, including what it can and cannot offer, policies on ethical conduct, and policies on safeguarding against retaliation.</li> </ul>
b. Accessible	There are no fees or costs associated with using our grievance mechanisms.
	<ul> <li>Access to these mechanisms is disclosed in our Sustainability Report and ESG Performance Data, and catered to local contexts and communication channels, e.g. Cowal's Facebook Page.</li> </ul>
	• Our Whistleblower framework is actively promoted across the business via updates from the Chief Executive Officer, posters and signage, etc.
c. Predictable	We publish accurate information on material grievance matters in our Sustainability Report and ESG Performance Data. In FY24, 100% of grievances were investigated, addressed and closed out by the end of the year.
d. Equitable	<ul> <li>Autonomy is afforded as stakeholders can withdraw their grievances as per our ESG Performance Data.</li> </ul>
	Our Whistleblower service is confidential.
e. Transparent	See our ESG Performance Data for the outcomes of our grievance mechanisms.
f. Rights-compatible	Our Whistleblower service is compliant with a range of local and global legislation, codes and standards, which include human rights frameworks.
g. A source of continuous learning	We have engaged with external partners, including ACSI, to discuss the effectiveness of our grievance mechanisms.
	<ul> <li>All grievances submitted are investigated aligned with our internal investigation procedures and Standards which entail minimum requirements for documenting and sharing learnings.</li> </ul>
h. Based on engagement and dialogue	See 'b. Accessible'.

# Identification of modern slavery risks

#### Operational and supply chain modern slavery risk

Evolution does not condone modern slavery practices in its operations or supply chains. We acknowledge that, given the nature and extent of modern slavery, as well as our procurement practices from various industries identified to be at higher risk - such as cleaning, security, or construction labour - modern slavery may be difficult to detect in our Tier 1 and 2 (and beyond). As a result, there remains a risk that modern slavery may be present in our operations and supply chains.

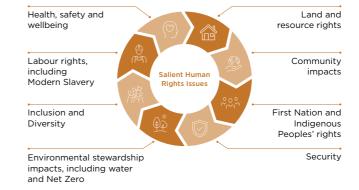
To mitigate these risks, we identify, evaluate, and regularly assess modern slavery risk as early as reasonably practicable in the mine life cycle.

We assess the salient human rights issues<sup>17</sup> across the business to identify those stakeholders at risk of negative impact. This risk identification is supported by our Integrated Risk Management Framework, associated Policies and Standards and materiality assessment processes.

Modern slavery can manifest in child labour, human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, sexual exploitation and deceptive recruiting and are serious crimes under Australian and Canadian law. Groups at particular risk include women, Indigenous peoples, migrant workers, third-party employees, and local communities.

To assist with identifying where and how modern slavery risks could be potentially encouraged in our operations and supply chain, Evolution adopts the UNGP's "cause, contribute and directly linked" concepts and aligns our definitions with the UNGC's<sup>18</sup>. We are vigilant in engaging suppliers to determine if, through our actions, our business could have impacts and have considered them in relation to our high-risk categories below.

#### Our salient human rights risks



#### Modern slavery risks in our direct workforce

We consider the risk of modern slavery practices within our direct workforce to be low as our workforce primarily operates within Australia and Canada, countries with robust legal, governance and regulatory frameworks, particularly around human rights.

Evolution is committed to providing workplaces where our people, including contractors and business partners, are physically and psychologically safe, healthy, and well and receive fair treatment. Our workforce is expected to comply with the Sustainability Principles, Sustainability and People and Culture policies, Codes of Conduct, standards, procedures and work instructions. The modern slavery risks that relate to our direct workforce are assessed in the context of these policies and practices, and against legal, contractual and external requirements. We continue to review the robustness of these internal policies, systems and processes to ensure compliance with legal, governance, and contractual obligations and support entitlements relating to employment.

We have established several controls to support the identification and management of potential modern slavery risks within our direct workforce. Controls include the formal training we provide our employees which builds awareness of the issues; knowledge of the relevance and responsibilities in their role; and understanding of the mechanisms available to voice concerns and provide feedback (e.g. Whistleblower Policy and confidential reporting mechanisms).

Throughout FY24, our workforce has had access to and has been made aware of mechanisms to voice concerns and provide feedback, both positive and negative. They have been encouraged and supported to share their worker voice via the Your Voice employee engagement survey (see pg. 78 of our 2024 Annual and Sustainability Report). Responses indicated generally positive sentiment, aligned with global benchmarks, in areas relevant to perceived or actual modern slavery concerns; i.e. feeling safe to speak up and the business having a commitment to safety.

Equipped with these insights, we will be well-informed to further engage our people to understand and manage their concerns. Other mechanisms such as contract reviews, LOD1, 2, and 3 audits and the whistleblower framework have added further insights.

The approach and supportive programs collectively help to create a workplace that supports workers professionally and personally and minimise the risk of modern slavery practices.

### **Engagement and listening**

## 77%

feel psychologically safe and comfortable to voice their opinions, aligned with the Global benchmark.

## 87%

feel there is a commitment to safety throughout the business, aligned with the Global benchmark, and exceeding the benchmark in supervisors demonstrating commitment to safety.

<sup>17 &</sup>quot;The human rights at risk of the most severe negative impact through the company's activities and business relationships." (UNGP Reporting Framework)

#### Modern slavery risks in our supply chain

While 98% of our supplier spend is with our Australian and Canadian-based suppliers, some provide goods and services across multiple categories with various inputs to their supply chains, which may be sourced from potential high-risk jurisdictions. This could pose a risk of contributing to modern slavery in our supply chain, where visibility and the ability to influence are limited. We also understand that companies can inadvertently elevate the risk of human exploitation by placing unreasonable demands on

We conduct regular reviews to understand where we are most at risk of modern slavery in our supply chains, including at the screening and tendering stage. This includes conducting a review of our business operations and supply chain structures, as follows:

#### **Business operations**

What are the broad areas of the operations being assessed?

#### Industries and sectors

What are the sectors and industries supplying to this business operation?

#### Categories

What are the categories of the goods and services being sourced?

#### Supplier entities

Who is supplying the goods or services?

#### Country of origin

Where are the goods or services being sourced from?

The accompanying matrix outlines what we consider to be our high-risk categories mapped against certain types of potential modern slavery risk areas, including:

Sector & Industry risks - certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.

Products & Services risks - certain products and services may have modern slavery risks because of the way they are produced, provided or used.

Geographic risks - some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict migration flows and socioeconomic factors like poverty.

Entity risks - some entities may have particular modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

High-risk category matrix		Cause	Contribute	Directly linked
High Risk Category				
PPE	S&I P&S G E		•	•
Chemicals	S&I P&S G E		•	•
Tyres	P&S G			•
Lime and cement	S&I P&S			•
Fuel	P&S G			•
Grinding Media	S&I P&S G E		•	•
Lubricants	P&S G			•
Camp services	S&I E		•	•
Mechanical spares	P&S G		•	•
Transport	G S&I E			•
IT	S&I P&S			•

This categorisation and assessment of risk aligns with the Department of Home Affairs' Modern Slavery Act 2018: Draft Guidance for Reporting Entities, Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities, and linked with the UNGP's "cause, contribute and directly linked" concept.

# Assessing, managing and remediating modern slavery risks

We mitigate our modern slavery risk with adherence to our various frameworks, policies, and corporate governance processes. We recognise that with evolving legislation and international frameworks, there is the expectation for increased risk analysis (qualitative and quantitative) and meaningful action and influence to improve situations where potential or actual modern slavery risk is identified.

#### Sustainable procurement

Sustainable procurement is a powerful lever for influencing suppliers' sustainability performance and business conduct, including the seriousness to which modern slavery risks are addressed. Our approach recognises the opportunity to positively impact communities by taking a considered approach to how and where we source our goods and services. By addressing sustainability issues and considering commitments in our end-to-end procurement practices, we can manage modern slavery risks and opportunities, minimise adverse impacts and promote positive environmental, social, and economic outcomes.

Sustainable Procurement, Modern Slavery and Human Rights were reaffirmed as Material topics with up to 'High Importance' for our business in FY24. They remain embedded into our risk management and our procurement approach, with attention to net zero, geopolitical risks, Indigenous procurement, environmental stewardship including water and waste management, transport and hazardous chemicals/explosives management linked to Our salient human rights risks.

We aim to actively manage these risks and require the same from our contractors and suppliers. To improve the supply chain's social, environmental, and ethical footprint. we seek to screen and work with contractors and suppliers who share our values and expect they follow high standards of governance and compliance with all applicable laws and our policies. They are required to be accountable for their actions and have established governance mechanisms to ensure alignment with these requirements. Their commitment to demonstrating compliance with this Statement, Supplier Code of Conduct and Procurement Statement are considered mandatory.

#### Corporate Governance

Evolution's approach to assessing and addressing modern slavery risk is managed within the same governance structure for managing Evolution's material ESG risks and opportunities, as outlined below. This governance structure applies to all entities owned and controlled by Evolution.

The Board of Directors is responsible for the oversight of all Sustainability issues with the Board Risk and Sustainability Committee delegated to ensure the effective management of human rights-related risks, including modern slavery, as set out in its Charter. To ensure oversight of modern slavery risks and monitoring of our progress internally, Evolution's Leadership Team and Board Risk and Sustainability Committee are regularly updated on our Sustainability Performance, which includes the supplier ESG program via the Sustainable Procurement framework, modern slavery and human rights performance.

Our Vice President Sustainability has responsibility for the oversight of modern slavery risks within our supply chain and business. The day-to-day implementation and coordination of modern slavery and human rights activities is undertaken by our Group and Site Sustainability and Supply Teams in close collaboration with other areas of the business, including the Commercial, Operations and Exploration teams who manage procurement processes including supplier due diligence, contracts and engagement.

Refer to our 2024 Corporate Governance Statement for more information.

#### Modern Slavery governance structure

# **Systems** • Strategy and Modern Slavery **Business Guide** Risk appetites • Risk governance Modern Slavery • Risk analysis and reporting

- Operational Risk Register
- · Management, assurance and verification
- Project assessments

#### **Process and accountabilities**

**Board of Directors** 

Audit

Committee

#### People

### **Board of Directors**

Oversight of Evolution's Sustainability Strategy, assurance, resourcing, and performance

- Sustainability and Strategic Planning Policy and Standards
- **Business Guide**
- Group Risk Register

**Managing Director and Chief Executive Officer** 

#### Responsible Leadership **Team Member - Vice President Sustainability**

**Risk and Sustainability** 

Committee

Oversight of Evolution's

Sustainability Strategy,

assurance, resourcing,

and performance,

including Modern

Slavery and

**Human Rights** 

Responsible for the Sustainability Portfolio, including governance, reporting, and performance. Risk Owner for Modern Slavery and Human Rights

Leadership Team, Site Leadership Team. Sub Committees

Remuneration

Committee

#### **Leadership Team** and Management

The Sustainability Strategy is developed and approved by the Leadership Team and endorsed by the Board



#### **Modern Slavery Community of Practice**

#### **Operations**

People and Culture, Supply and Sustainability teams are responsible for the development and implementation of policies, practices and reporting relating to Evolution's direct workforce

### **Supply Chain**

Supply and Sustainability teams are involved in the development and implementation of policies, practices and reporting on modern slavery across our supply chain

#### **Group and Operations**

Support embedding Modern Slavery and Human Rights risk management at all levels of the business

### Responding to identified modern slavery risks

Evolution maintains a framework for how we manage identified cases of modern slavery within our business or supply chain to ensure consistency in working with our suppliers to manage the risk and take corrective actions.

#### Identification

Who: Personnel who become aware of a case of modern slavery and representatives from the Site Supply team

What: Capture information and material to help identify the modern slavery and document concerns raised

#### Elevation

Who: Relevant Site Supply Team

What: Collate material collected from the identification and provide to the Group Manager - Supply and Group Manager - Social Responsibility and ESG Reporting

Who: Group Manager - Supply and Group Manager - Social Responsibility and ESG Reporting

What: Meet to discuss the findings and set a plan on how to engage with the relevant site and identified suppliers. Provide communication to the Vice President Sustainability.

#### Notification

Who: Vice President Sustainability

What: Formal notification to the Leadership Team

### Engagement

Who: Authorised Evolution personnel (as approved by the Vice President Sustainability)

What: Formally communicate concerns to identified supplier seeking further clarification and a formal response

Who: Group Manager - Supply and Group Manager - Social Responsibility and ESG Reporting

What: Review the formal response received from the identified supplier and set out a rectification plan, if required. Rectification plan to be submitted to the Vice President Sustainability for authorisation prior to re-engaging with identified supplier. In the event that identified supplier provides sufficient response to alleviate concerns about modern slavery then the Vice President Sustainability is to be formally notified and after advice from the Leadership Team, case may be closed.

#### Rectification

Who: Group Manager - Supply and Group Manager -Social Responsibility and ESG Reporting

What: Continue to work with identified supplier to mitigate their exposure to modern slavery, being mindful to protect the wellbeing of those identified as being enslaved

Who: Personnel who become aware of the case of modern slavery and representative from relevant Site Supply team; Group Manager - Social Responsibility and ESG Reporting, Group Manager - Supply.

What: Upon mitigation measures being put in place, the business will need to monitor identified supplier performance to ensure that the mitigation actions taken continue to be in effect. Any further incidents identified require recommencement of the process.

#### Reporting

Who: Group Manager - Supply and Group Manager - Social Responsibility and ESG Reporting

What: Identified cases will be reported to the Leadership Team throughout the year

All Modern Slavery incidents (potential or actual) will be escalated using reporting protocols, including to the Vice President Sustainability as per our Corporate Governance reporting requirements.

#### Risk management

Our risk-based decision-making approach to the protection of human rights and the prevention of modern slavery is underpinned by Evolution's Sustainability and Strategic Planning Policies, Standards, and Integrated Risk Management Framework. Implementing the approach is supported by our business guidelines and site processes and procedures aligned with the principles of Australian and international standards and guidance. See *Our policies* 



Risk register

#### Remediation measures

In FY24, two incidents of potential or actual modern slavery and human rights risk were investigated in accordance with our Modern Slavery Business Guide framework. A closer analysis that looked beyond our Tier 1 supplier, revealed potential concerns related to the Tier 2 sourcing of electronic equipment from an Asian region separately reported to have known instances of human rights and modern slavery abuses.

Our response plan included obtaining a screening report from an external partner, and direct engagement with the identified Tier 1 suppliers seeking further information. After receiving completed SAQs and a formal response from the suppliers, they were not found to be in breach and no further action was required. Correspondingly, no measures were required to be taken to remediate any forced labour or child labour, nor to remediate the loss of income as a result of these actions.

Evolution acknowledges that adverse impacts can result from measures to eliminate modern slavery, including loss of income to the most vulnerable families that modern slavery legislation is seeking to protect.

In FY24, the Integrated Risk Management Framework and

Group and Site Risk Registers were reviewed. All matters

recorded in a database and communicated widely across the

organisation commensurate with the relevance of the issue.

These are reviewed regularly including by the Board Risk

relating to Sustainability, including human rights, are

and Sustainability Committee, supported by the Site Leadership Teams, subject matter experts and the

Where a potential or actual incident arises, we align with the above response framework, including rectification and remediation in alignment with the UNGP's Principle 22 on Remediation and Walk Free's Modern Slavery Response and Remedy Framework. In line with continuous improvement. we are aiming to strengthen our Modern Slavery Business Guide to include practical remediation steps aligned with the UNGP's Principle 31 'Effectiveness criteria for on-judicial grievance mechanisms'. See Complaints and grievance

# Assessing and improving our effectiveness

Assessing the effectiveness of our modern slavery risk management and actions is undertaken annually and embedded into our standard reporting, document review process, and audit and gap assessment processes. We conduct annual benchmarking and gap assessment exercises with ESG agencies and deliver our Annual Sustainability Report with attention to external obligations for modern slavery risk management. We continue to be a top performer in our industry globally (see pg. 39 and 40 of the Report). Other key activities that form the basis of our modern slavery action plan to assess effectiveness include:

Education and reporting: Information sharing, knowledge sharing in SRMs, inductions, lunch and learn sessions and

risk-based training for our senior operations leaders and procurement staff, support a constructive reporting approach.

Supplier risk identification and prioritisation: We continue to focus our supplier due diligence on our medium to high-risk suppliers, and on our highest-spend customers through SAQs, deep dive sessions, and any identified risks, gaps, and outcomes from those activities. We included a provision in our vendor onboarding that enables our employees to flag a supplier with potential or actual risk of modern slavery in the supply chain. It also remains a focus to improve SAQ return rates from high-risk suppliers.

FY23 commitments	Status FY24 commentary and looking ahead to FY25	Page
Identification and assessment		
Work with the high-priority Tier 1 suppliers to improve our understanding of their supply chains. (Linked with Northparkes' action to improve data collection for the country and region of origin of materials or services used by suppliers by way of updated supplier due diligence questionnaires)	<ul> <li>Completed the FY24 SAQ process with an increased supplier base compared to FY23.</li> <li>Engaged suppliers through the Sustainability Advantage Sustainable Value Chain Project regarding Scope 3 emissions.</li> <li>Northparkes collaborated with suppliers to identify the country of origin of 7,309 materials (out of 8,774). Country of origin can now be identified for all new stock items via a new process.</li> <li>FY25 ACTION: SAQ will be reviewed at minimum annually.</li> </ul>	9
Refine mapping the next tier of suppliers against geographic, commodity and industry modern slavery risk indicators. (Linked with Northparkes' action to consider supply chain mapping for higher modern slavery risk supply)	<ul> <li>SAQ updated to enquire on the regions where our Tier 1 suppliers are sourcing their goods and services. Identified opportunities to enhance the questions to allow for more granular quantitative analysis moving forward.</li> <li>Northparkes periodically reviews supplier country of origin risks for materials held in inventory, using a risk rating tool based on the 2023 GSI.</li> <li>Discussions held with external partners and service providers to understand mapping capabilities.</li> <li>FY25 ACTION: Preferred option will be implemented in FY25.</li> </ul>	10
Review our risk profile and assessment process to enable enhanced insights, for example, commence a review of the highest- risk category in our supply chain	<ul> <li>Evolution acknowledges that with the maturity of the Australian Act and other international frameworks, risk assessment and identification will be required for each supply chain category.</li> </ul>	14
Addressing and mitigation		
Initiate deep dives into high-risk goods and services categories to investigate potential modern slavery risks	<ul> <li>Insights and actions from FY23 sessions have supported improvements in FY24.</li> <li>FY25 ACTION: Several high-risk goods and services category suppliers have been identified for follow-up or new deep dives in FY25.</li> </ul>	
Determine action plan for non- responding vendors to our SAQ	<ul> <li>Site and Group Supply continuing to engage with non-responding suppliers, including via SRMs, and where no response was received, they were identified as non-compliant.</li> <li>FY25 ACTION: Action plan is continuing to be reviewed by our CoP.</li> </ul>	9
Seek independent validation of our SAQ process	<ul> <li>Options assessed in FY24, including external platforms and service providers. See action for implementation of preferred option above.</li> </ul>	11, 12
Awareness and prevention		
Review and improve our due diligence, risk management, training and supplier engagement systems and processes with respect to modern slavery risks	<ul> <li>As well as the SAQ updates, a business-wide review and refresh was undertaken of the Request for Tender and screening questionnaire and evaluation criteria.</li> <li>FY25 ACTION: The outputs of this review will be implemented. We will also consult external partners for ongoing improvement of due diligence processes.</li> </ul>	9
Continue to embed an awareness of the risk of modern slavery with our existing suppliers	<ul> <li>Modern slavery and broader ESG items embedded in vendor onboarding process, contract negotiations and contract management in FY24, for example in SRMs.</li> <li>FY25 ACTION: Roll out above mentioned Request for Tender templates and other market engagement.</li> </ul>	9, 11
Review and update training materials and close any related training gaps across our business	<ul> <li>Our CoP is reviewing the updated training materials which account for the Canadian Act and Northparkes acquisition.</li> <li>Regular assessment of the effectiveness of modern slavery training through tracking and reporting completion rates and following up with relevant personnel.</li> <li>FY25 ACTION: Roll out updated training materials and review the Training Needs Analysis with relevant personnel.</li> </ul>	11
Monitoring, communication and ef	fectiveness	
Develop and maintain audit tool for Human Rights and Modern Slavery Standard	<ul> <li>Line of Defence 1, 2 and 3 audit programs embedded, with independent verification of the processes in place.</li> <li>Human Rights and Modern Slavery and salient risks were embedded in our FY24 Stakeholder Perception Survey.</li> </ul>	6, 11, 13

Progress on key commitments • = Complete • = In progress, ongoing action in FY25

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FY23 commitments	Status FY24 commentary and looking ahead to FY25	Page
Use KPIs to monitor the effectiveness of implemented strategies, with a focus on levels of training and compliance	<ul> <li>Specific KPIs and measurements developed in collaboration with our CoP.</li> <li>FY25 ACTION: Roll out KPIs.</li> </ul>	9
Monitor and manage emerging legislation and disclosures (i.e., transitional risk)	<ul> <li>Active review and management against frameworks such as UNGC, UNSDGs, GRI, Task Force on Nature-related Financial Disclosures (TNFD) and Standards such as the International Financial Reporting Standards S1 &amp; S2 and the Australian Sustainability Reporting Standards S1 &amp; S2.</li> </ul>	3, 6, 11
Collaborate with external partners and groups, including via knowledge sharing and collaboration with industry peers	<ul> <li>Engaged with ACSI and UNGCNA. Committed to engaging in knowledge sharing and collaboration sessions with industry peers in FY25.</li> </ul>	11, 12
ESG		
Finalise our Sustainable Procurement Framework to ensure the processes and procedures that underpin it are adequate to identify and address all relevant risks	Completed in FY24. Sustainable Procurement and its focus on Indigenous procurement will be reevaluated and supported by the endorsed Reconciliation Plan.	15
Review the Procurement Statement	<ul> <li>Procurement Statement and Supplier Code of Conduct updated and published in alignment with Sustainability objectives.</li> </ul>	8

Progress on key commitments • = Complete • = In progress, ongoing action in FY25

#### Consultation with our entities

This Statement has been approved for release by the Leadership Team and the Board of Directors, and they are also briefed on regulatory requirements and risk performance.

Throughout FY24, we consulted our Sustainability, Supply, People and Culture specialists, the Communications and Corporate Affairs team, and engaged each Site Supply team to identify potential high-risk suppliers. This has supported our CoP in developing the Statement. Within the reporting period, an average of ~2 CoP members attended eight meetings including:

- · CoP focused on pursuing efficiencies in the operational management of Human Rights and Modern Slavery;
- engagement with external partners, ACSI and UNGCNA to assess previous reports and identify improvements;
- integration of Northparkes' approach to enable consistencies across the operations' scope; and
- development and submission of the Canadian 2023 Report to the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

We look forward to sharing our progress with you in our 2025 Modern Slavery Statement.

**Modern Slavery Statement Version Control: 5.0** Issued: 02/12/2024

**Review Date:** 01/12/2025 Owner: Fiona Murfitt Vice President Sustainability Approver: Jake Klein Executive Chair