



NORTHERN STAR  
RESOURCES LTD

# FY24 Modern Slavery Statement





# FY24 Annual Reporting Suite

This Modern Slavery Statement (**Statement**) has been prepared by Northern Star Resources Ltd ABN 43 092 832 892 (**Northern Star**) to meet the requirements of the Australian *Modern Slavery Act 2018* (Cth) for the financial year ending 30 June 2024 (**FY24**).

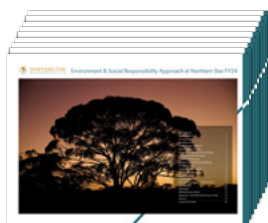
Unless expressly stated otherwise, all references to 'our', 'we', 'us', the Company or Northern Star refer to the Group, as detailed on pages 12 and 13 in Our Corporate Structure. Please refer to the Glossary for the definitions of the capitalised terms used in this Statement.

The percentage figures disclosed in this Statement are subject to rounding and may not add to 100%.

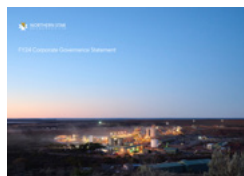
The full 2024 Annual Reporting suite is available at [www.nsr ltd.com](http://www.nsr ltd.com)



[FY24 Annual Report](#)



[FY24 ESR Reporting Suite](#)



[FY24 Corporate Governance Statement](#)



[FY24 Modern Slavery Statement](#)

**Cover photo:** Steffi Milling, Geologist & James Thomas, Project Geologist at the Carosue Dam Operations solar farm, Kalgoorlie Production Centre

## Acknowledgement of country

Northern Star acknowledges Traditional Owner groups whose land we are privileged to work on, and whose input and guidance we seek and value within the operation of Northern Star's business. We acknowledge their strong and special physical and cultural connections to their ancestral lands and pay our respects to their Elders, past and present.

# Contents

<b>Introduction</b>	<b>4</b>
Highlights	4
Message from the Chair of the ESS Committee	4
Our Progress	5
<b>About this Statement</b>	<b>6</b>
This Statement	6
Consultation with Group entities	7
Mandatory Criteria	7
<b>About Northern Star Resources Ltd</b>	<b>8</b>
Our Company	8
Our Purpose	9
Our STARR Core Values	9
Our workforce	10
Our Operations	10
Our corporate structure	12
Our supply chain	14
<b>Modern Slavery Risks</b>	<b>16</b>
Risk management	16
Risk assessment	16
Case study: Ongoing renewable energy supply chain assessment	17
Our modern slavery risks	18
<b>Action Taken to Address Risks</b>	<b>20</b>
Corporate governance	21
Policies & frameworks	22
Grievance mechanisms & remediation	24
Training & awareness	25
Supplier due diligence	26
Contract termination	30
Investigation & remediation	30
Collaboration & engagement	31
<b>Assessing Effectiveness</b>	<b>32</b>
<b>Planned Actions for FY25</b>	<b>34</b>
<b>Glossary</b>	<b>36</b>

## Highlights

81%  
of key accountable employees have completed awareness training.<sup>1</sup>

Tier 2 & Tier 3  
supplier identification pilot assessment completed. See the case study on page 17.

10  
audits completed on our Tier 1 suppliers' practices.

<sup>1</sup> The total number of key accountable employees at 30 June 2024 is 338. The remaining employees have until 31 December 2024 to complete the training.

# Introduction

## Message from the Chair of the ESS Committee

I am pleased to present Northern Star's FY24 Modern Slavery Statement, which outlines our commitment to mitigating the risk of modern slavery existing in our operations and supply chains.

We are proud of our efforts and continued improvements in this area: increasing the number of on-site audits conducted from previous years, maintaining a sustained focus on growing awareness and educating our employees and suppliers, and enhancing our modern slavery risk management approach.

In FY24 we focussed on advancing our efforts to understand and identify potential risks of modern slavery within our supply chains. We expanded our due diligence practices deeper into our supply chain. An example is the detailed assessment we carried out in relation to the Tier 2 and Tier 3 suppliers of our own Tier 1 supplier of solar panels. The experience and lessons learnt during this pilot assessment will be applied to other suppliers in our supply chain in coming years.

We believe continued advancements are required to achieve lasting impact in this area, and we support the Australian Government's work to further strengthen the *Modern Slavery Act 2018* (Cth) (**the Act**).

We did not identify any suspected or actual instances of modern slavery in FY24 through our due diligence efforts. We continue to strive for year-on-year improvements to our approach and in FY25 will prioritise improving due diligence response rates through sharing information and resources to build knowledge and capacity in our suppliers, reviewing our Supplier Code of Conduct and educating our suppliers to understand compliance with its requirements, and ongoing assessment of the effectiveness of our actions.





*Sally Langer*

**Sally Langer**

**Chair – Environmental, Social & Safety Committee**

Northern Star Resources Ltd

21 August 2024



Jundee processing plant, Yandal Production Centre

## Our Progress

Northern Star is committed to continuous improvement in all aspects of our business operations, and this extends to our commitment to take meaningful steps to identify and mitigate modern slavery risks and maintain responsible and transparent supply chains.

Progress against the planned actions in FY24 committed to in our FY23 Statement:

<p>Expand our human rights training to include more concise general awareness modules for all employees and contractors.</p>		<p>See <b>Training &amp; Awareness</b> on page 26 for more detail.</p>
<p>Improve the data we collect and analyse in relation to our supply chain, leading to more SAQ<sup>2</sup> responses and a higher understanding of our supply chain.</p>		<p>See <b>Self-Assessment Questionnaire</b> on page 27 for more detail.</p>
<p>Strengthen our understanding of our supply chain through assessment of Tier 2 suppliers.</p>		<p>See case study provided on page 17 for more detail.</p>
<p>Contribute to the upcoming review of the Act.</p>		<p>n/a</p>
<p>Develop a Frequently Asked Questions document to assist our suppliers in better understanding their obligations under our Supplier Code of Conduct.</p>		<p>n/a</p>
<p>Increase focus on supplier ESG screening in terms of assessment of information received, to improve the understanding of our supply chain, and potentially improve the quality of our supply chain to further mitigate modern slavery risks in our supply chain.</p>		<p>See <b>New suppliers &amp; tender requirements</b> on page 27 for more detail.</p>
<p>Complete the SAQ process on our suppliers who were identified as having a medium risk in FY23 risk assessment.</p>		<p>See <b>Self-Assessment Questionnaire</b> on page 27 for more detail.</p>
<p>Assist the Board and Executive in enhancing their oversight of modern slavery risks and mitigation actions.</p>		<p>See <b>Risk Management</b> on page 16 for more detail.</p>

<sup>2</sup> Supplier’s own self-assessment questionnaire.

<sup>3</sup> Engagement with our suppliers did not identify any common or frequently asked queries that would be beneficial to incorporate into a formal document. Instead, we will commence Supplier Code of Conduct audits and checks to confirm understanding of the document by our suppliers.

# About this Statement

## This Statement

As prescribed by the Act, this Statement covers:

- reporting entities covered by this Statement;
- company structure, operations and supply chain;
- modern slavery risks in our operations and supply chain;
- actions we have taken to assess and address those risks, including audits and corrective actions;
- how we assess the effectiveness of such actions;
- how we consult with our subsidiary entities; and
- other information we consider relevant regarding our efforts to combat modern slavery in our operations and supply chains.

This Statement is available on our website at: [www.nsr ltd.com](http://www.nsr ltd.com) and via the Australian Government's Online Register of Modern Slavery Statements at [www.modernslaveryregister.gov.au](http://www.modernslaveryregister.gov.au).



Emeka Odiaka, Geologist at Carosue Dam Operations, Kalgoorlie Production Centre

## Consultation with Group entities

This Statement has been approved for release by the Northern Star Board of Directors and is current as at 21 August 2024. The Statement is a joint statement by Northern Star for itself and all of its wholly owned subsidiaries (the reporting entity), in accordance with section 14(2)(d)(ii) of the Act.

Northern Star prepared this Statement in consultation with each other reporting entity that this Statement covers (all of which have three common directors with Northern Star), in accordance with section 14(2)(c) of the Act. Consultation was undertaken by our Group-wide Modern Slavery Working Group, which comprises members of the Procurement, Legal, Company Secretarial and ESG Engagement teams, who engaged with key areas of the business (including human resources,

procurement, and social performance). The Statement was reviewed in detail, and recommended to the Board for approval, by the Environmental, Social & Safety (ESS) Committee of the Board.



**Stuart Tonkin**  
**Managing Director & CEO**

*Northern Star Resources Ltd*  
*21 August 2024*

## Mandatory Criteria

This table outlines where the mandatory reporting criteria required by the Act have been addressed in this Statement:

Criteria	Section of this Statement
Identify the reporting entity.	About this Statement pages 6-7
	Our corporate structure pages 12-13
Describe the structure, operations, and supply chains of the reporting entity.	About Northern Star Resources Ltd pages 8-15
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Modern Slavery Risks pages 16-18
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Action taken to address risks pages 20-31
Describe how the reporting entity assesses the effectiveness of such actions.	Assessing effectiveness pages 32-33
Describe the process of consultation with any entities that the reporting entity owns or controls.	Consultation with Group entities page 7
Any other relevant information.	Introduction page 4
	Planned Actions for FY25 page 34



# About Northern Star Resources Ltd

This section details Northern Star’s business, operations and supply chains to provide context on potential interactions with modern slavery.

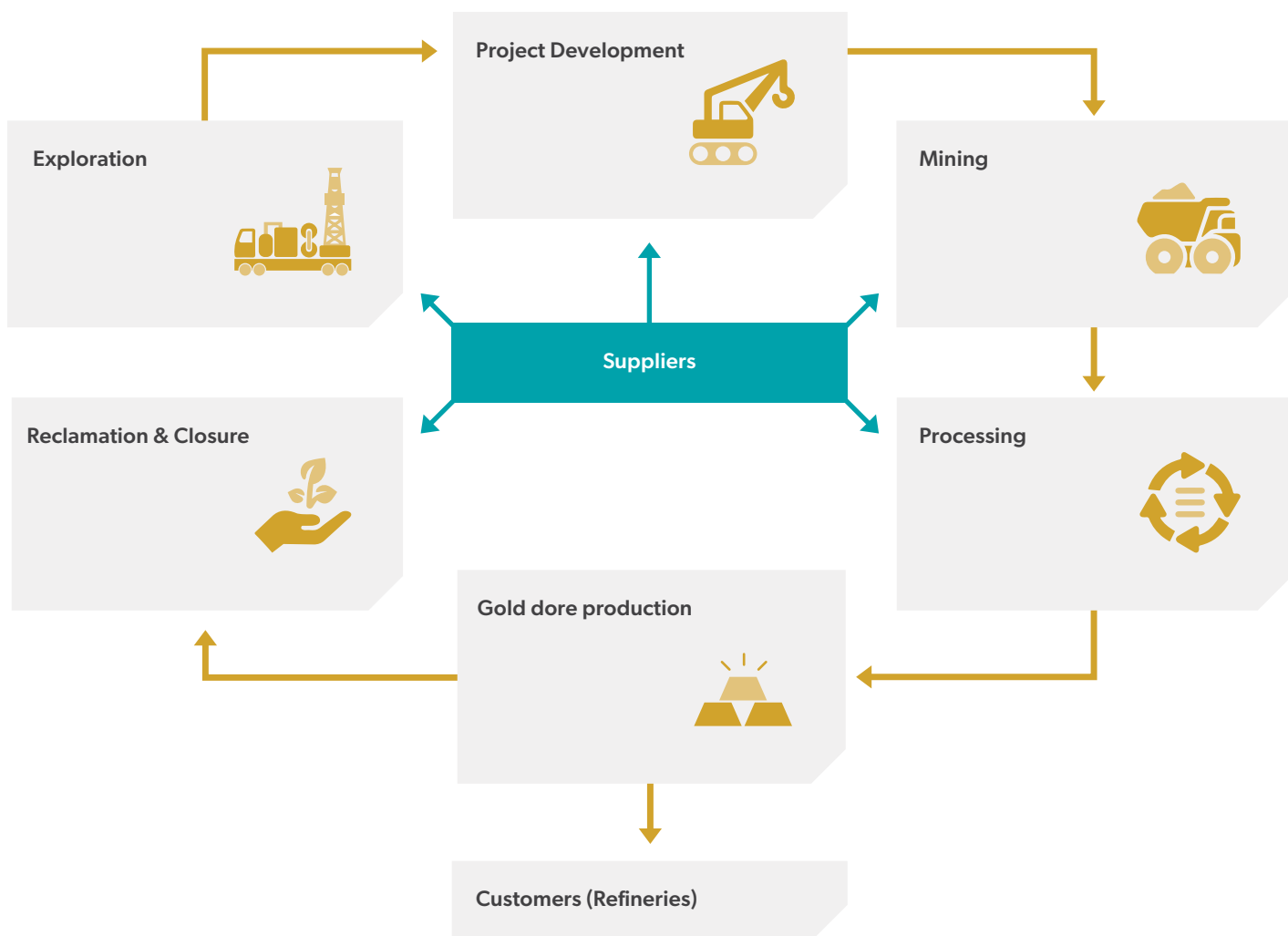
## Our Company

Northern Star is one of the world’s ten largest gold miners, with operating mines and exploration programs located in three production centres in the two world class jurisdictions of Australia and Alaska in the United States of America. Northern Star was incorporated in May 2000, and is a public company limited by shares listed on the Australian Securities Exchange (ASX: NST).

Northern Star Resources Ltd is the parent company for the Group. Full details of the organisational structure can be found on pages 12 and 13.

In our operations we explore for, extract, process and sell gold, as illustrated below.

Figure 1 Northern Star’s Value Chain



## Our Purpose

To generate superior returns for our shareholders, while providing positive benefits for our stakeholders, through operational effectiveness, exploration, and active portfolio management.

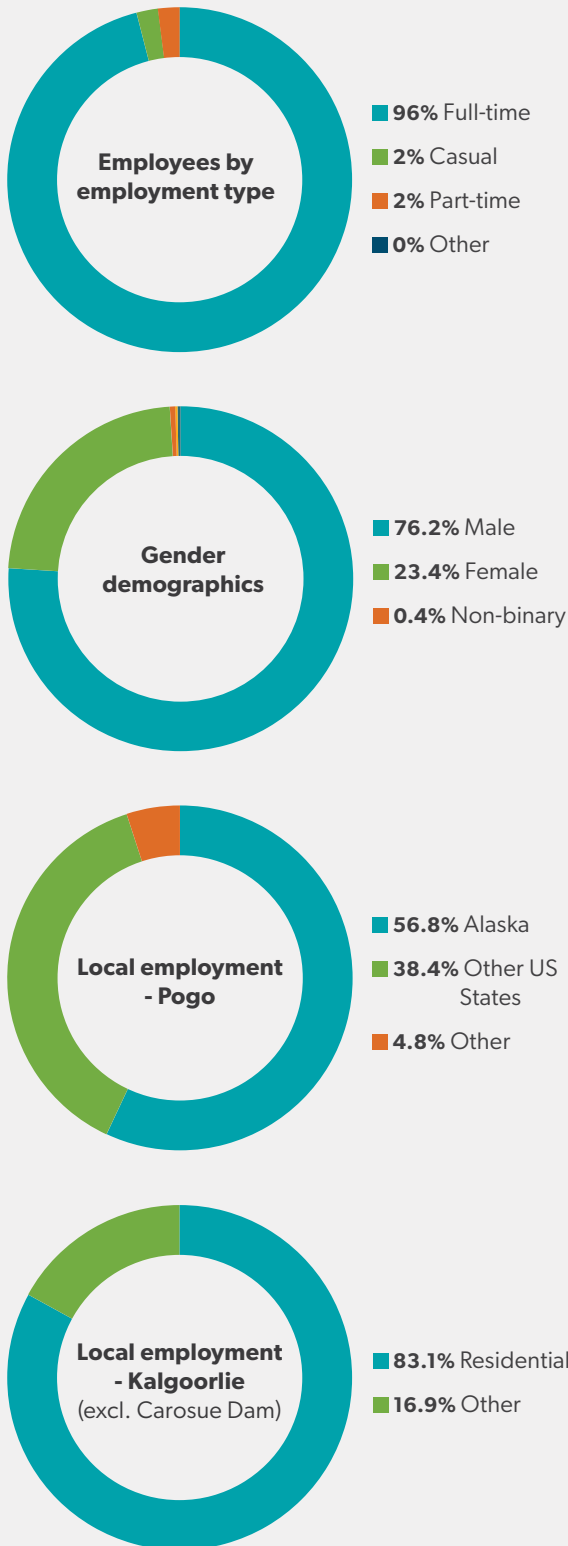
## Our STARR Core Values

Our STARR Core Values are integral to the working lives of all our workers, across all our operations, and form the foundation of everything we do as a business.



## Our workforce

At 30 June 2024 our workforce comprised 7,019 workers, of which 4,044 were employees and 2,975 were contractors. Most of our workforce is employed on a permanent basis, with less than 3% engaged on casual contracts.



## Our Operations

Northern Star owns and operates three gold production centres: Kalgoorlie and Yandal in Western Australia and Pogo in Alaska.

Figure 2 Worldwide Operations

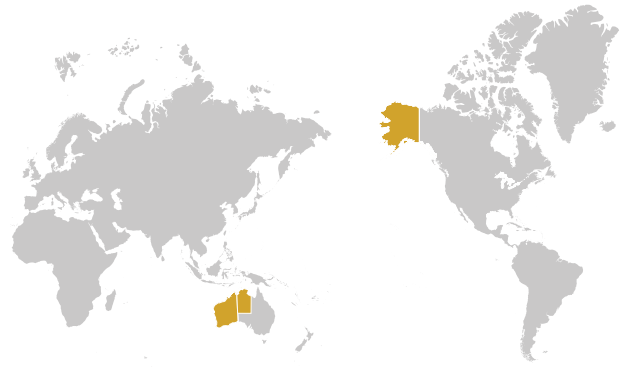
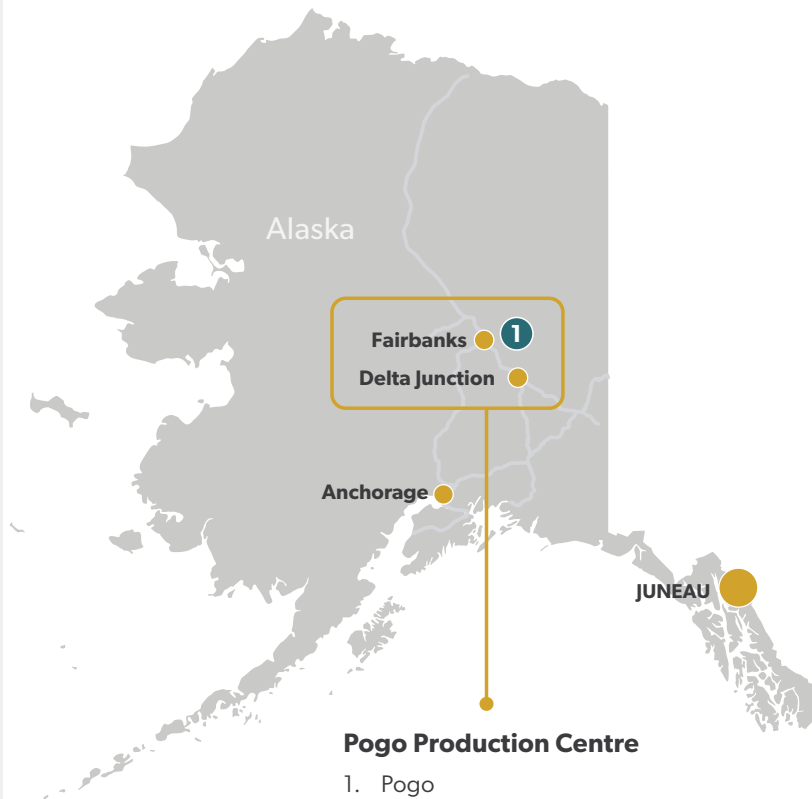
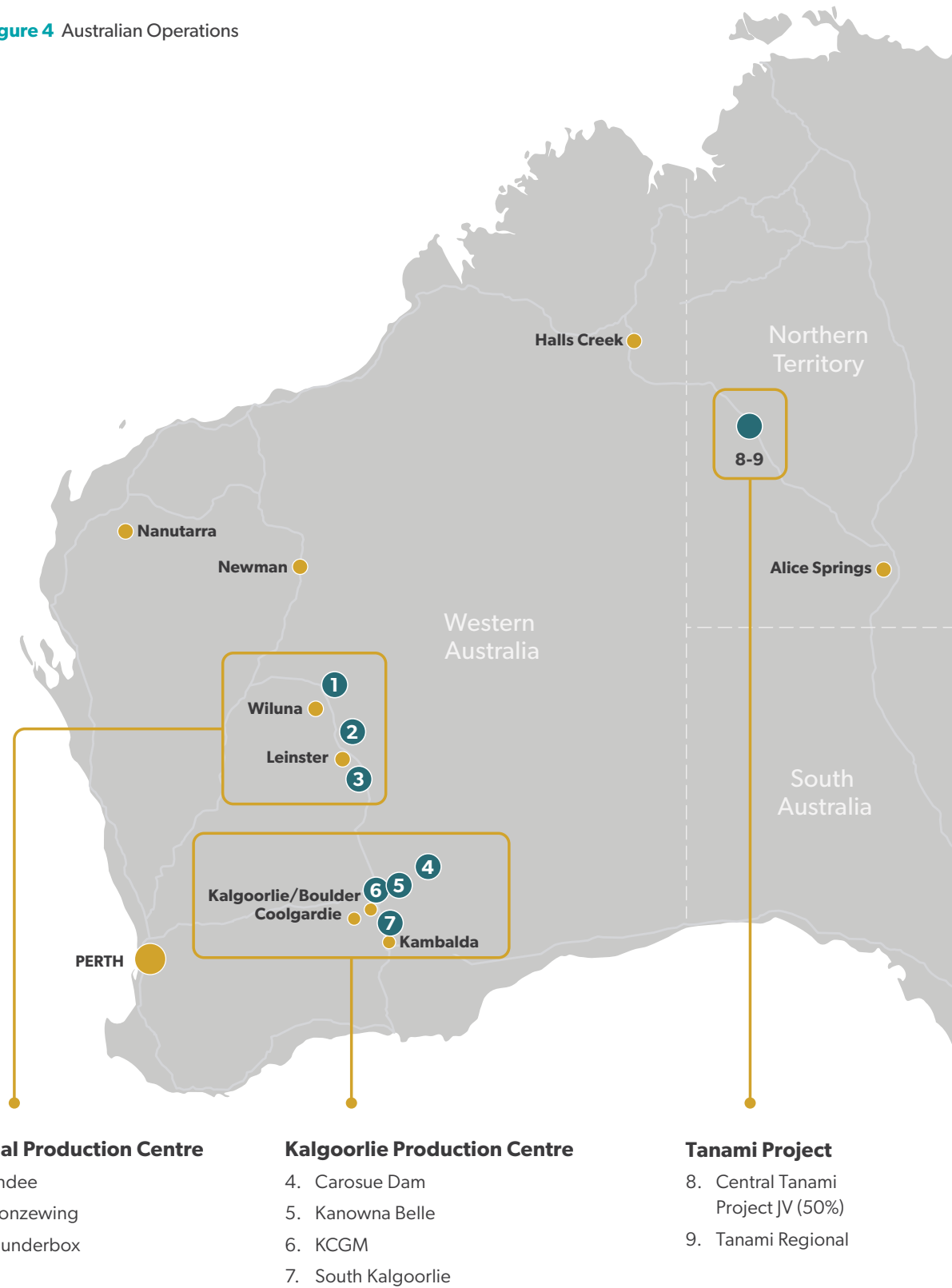


Figure 3 North American Operations

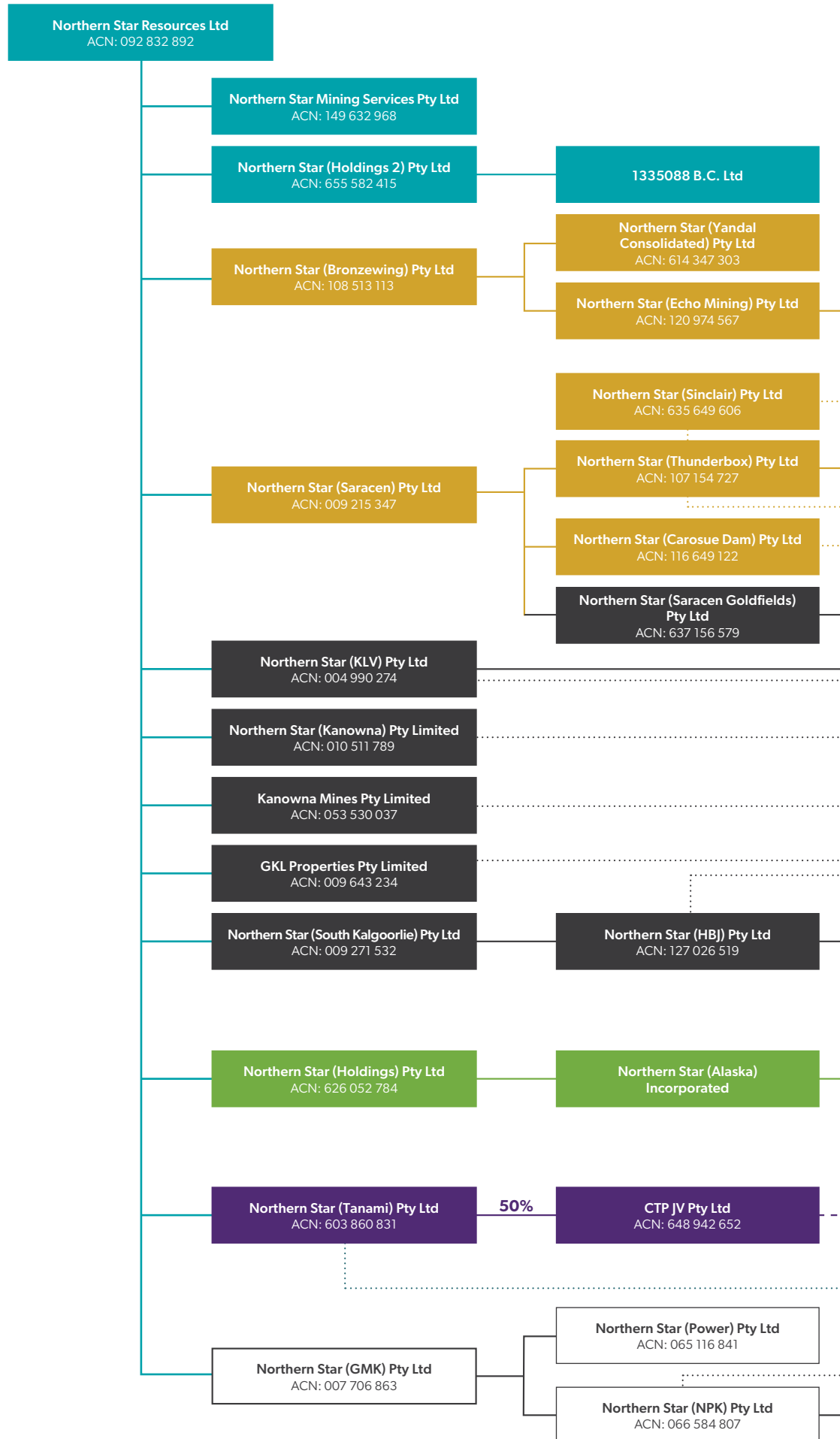


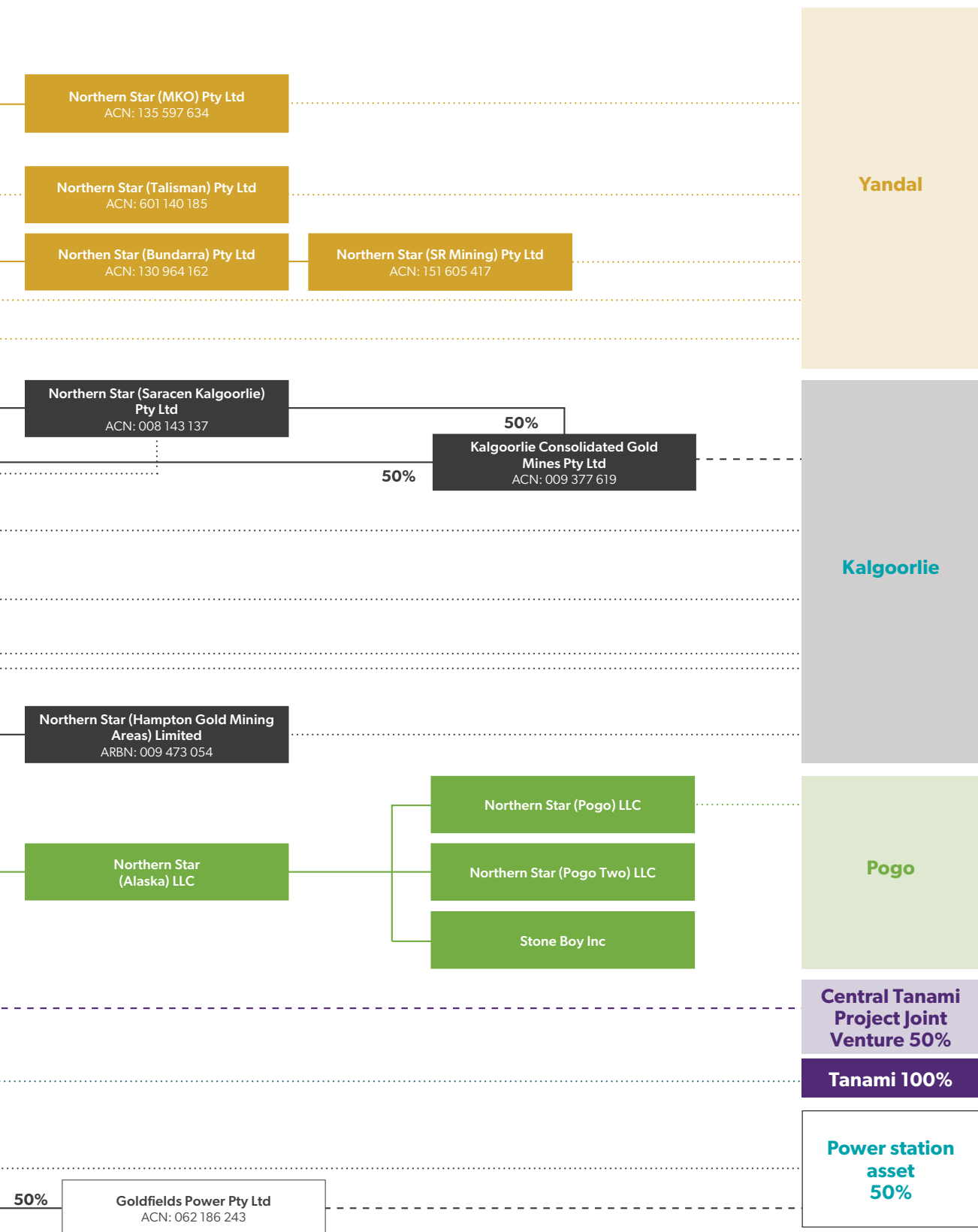
**Figure 4** Australian Operations



## Our corporate structure

- Yandal Production Centre
- Kalgoorlie Production Centre
- Pogo Production Centre
- Tanami Exploration Projects
- Infrastructure
- Ownership of Shares
- - Operating Entity/Manager
- .... Ownership of Project Assets



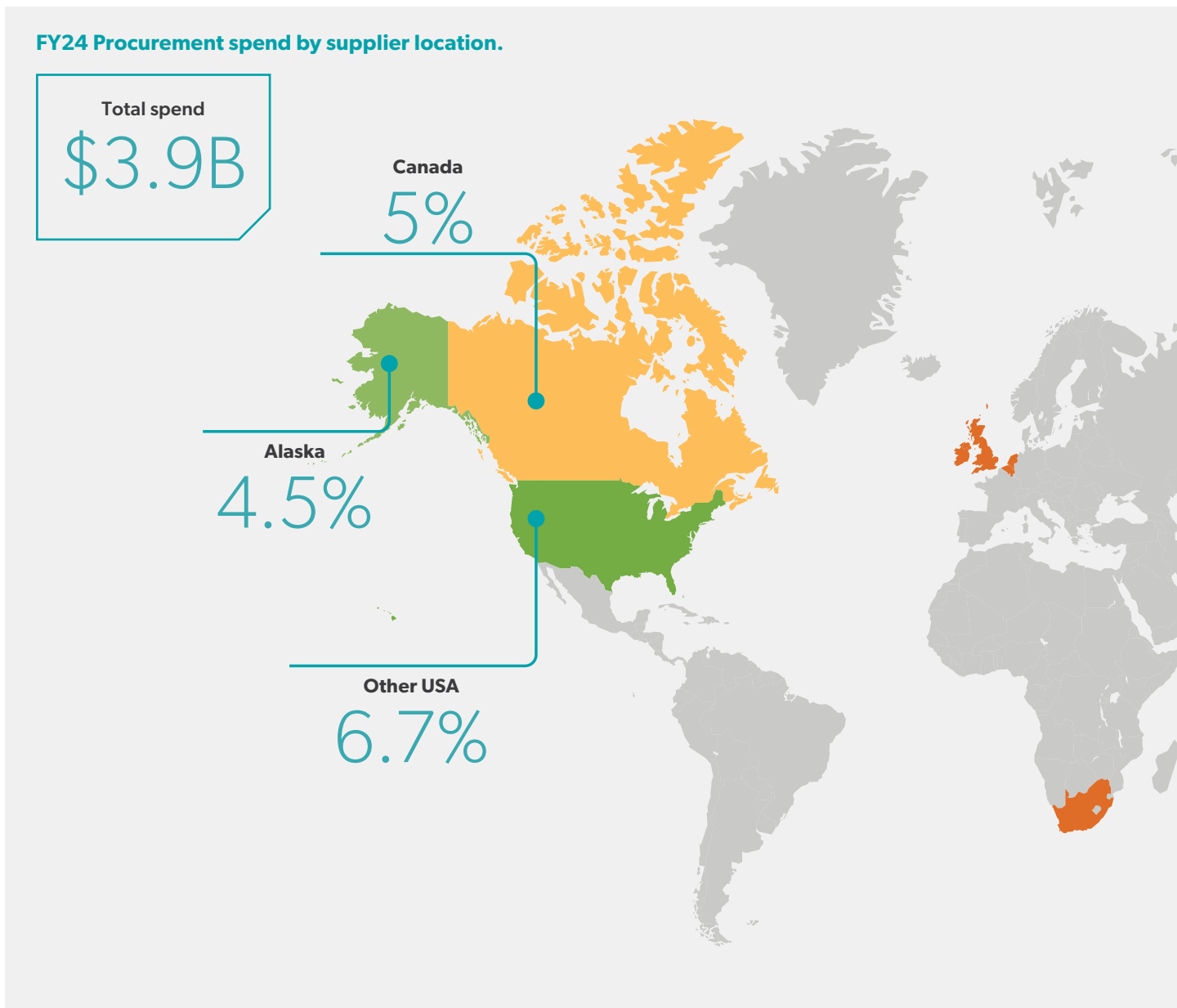


## Our supply chain

Northern Star’s operations are supported by a centralised Group procurement team that coordinates a global supply chain with 3,219 active<sup>4</sup> Tier 1 suppliers. Our supply chain reflects the location of our operations, with most of our Tier 1 suppliers located within Australia and the United States of America. In FY24, Northern Star spent a total of \$3,925,772,474<sup>5</sup> with 2,654 Tier 1 suppliers.

We prioritise use of local suppliers<sup>6</sup> where possible while ensuring our supply chain risks are mitigated through strong regional relationships and ongoing analysis of our supply chain. In FY24, \$746M representing 19% of total Group spend was to suppliers located locally to our Kalgoorlie, Yandal and Pogo Production Centres.

A focus on diversification of suppliers across our supply chain aids to further mitigate risk associated with goods and services procurement, as illustrated below. In certain circumstances, a reduction in the number of Tier 1 suppliers also assists in mitigating risk. The procurement team is focussed on reducing the number of Tier 1 suppliers where possible and appropriate, to improve efficiencies and reduce risk.



<sup>4</sup> Active suppliers are those who have issued an invoice within the previous 24 months, to 30 June 2024.

<sup>5</sup> Spend that is related to the provision of goods and services to Northern Star, under the direct influence and management of the procurement department. This excludes spend associated with matters such as royalties, taxes and employee salaries.

<sup>6</sup> Local suppliers means suppliers based in selected post code boundaries in and around the Kalgoorlie region for our Kalgoorlie Production Centre, suppliers based in selected postcode boundaries in and around our operations for our Yandal Production Centre and suppliers based in the State of Alaska for our Pogo Production Centre.

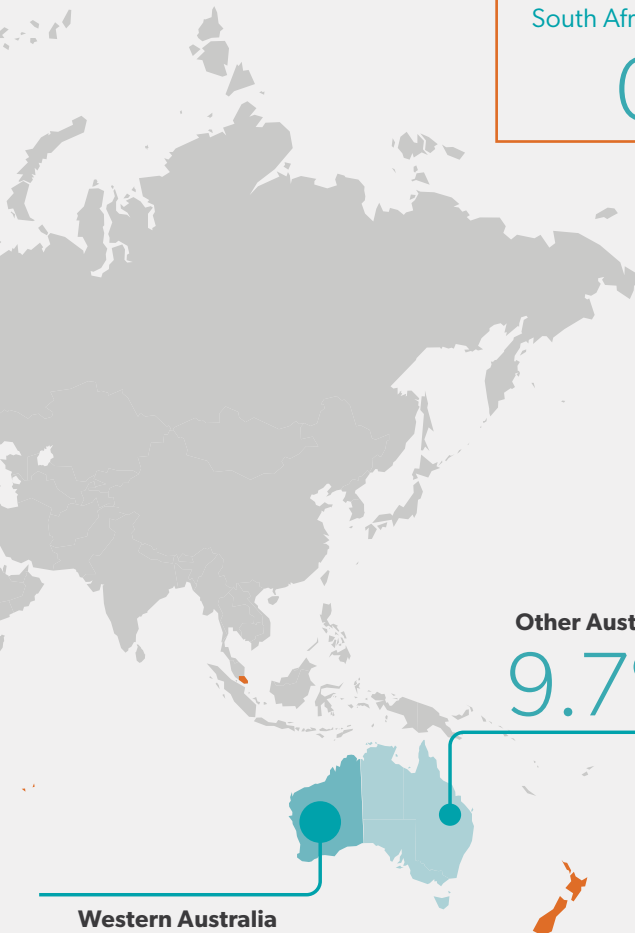


- **Australia**  
1927  
73%
- **USA**  
641  
24%
- **International**  
86  
3%



**Other International**  
(Ireland, Belgium, New Zealand,  
Netherlands, Singapore,  
South Africa, United Kingdom)

0.1%



**Other Australia**  
9.7%

**Western Australia**  
74%

In previous years we concentrated our assessment of modern slavery risks to Tier 1 suppliers only. Modern slavery can exist at any point in our supply chain, including Tier 2, Tier 3 or any other suppliers deeper into our supply chain. It is important that we understand the risks of potential modern slavery at Tier 2 and below. This ensures we are taking all reasonable measures to identify any instances of modern slavery within our supply chain. In FY24 we worked with one of our Tier 1 suppliers in a pilot assessment of our Tier 2 and Tier 3 suppliers to better understand the risk and how Northern Star may apply a similar assessment across our wider supply chain. Further information is provided in the case study on page 17.



# Modern Slavery Risks

This section provides an overview of Northern Star’s approach to modern slavery risk assessment and management practices.

## Risk management

Northern Star is committed to effective identification, monitoring and management of strategic risks presented by our operational and corporate activities. Our risk management activities are guided by Northern Star’s risk management framework, comprising a Risk Management Policy and Standard, enterprise risk and assurance system. The framework is aligned to ISO 31000 Risk Management Guidelines and provides a consistent approach to the assessment, management and reporting of risks across Northern Star.

The framework is overseen by the Audit & Risk Committee, which, as at 30 June 2024 comprised of four of the Company’s independent Directors. Modern slavery risks are assessed within this risk framework and are subject to annual reviews by our Chief Financial Officer in leading the procurement and risk functions within Northern Star.

## Risk assessment

We assess the modern slavery risks in our operations and supply chains using an inherent risk assessment based on a combination of country risk, product risk, and total spend, with relative weightings appropriate to our risk profile. The assessment targets Tier 1 suppliers each with an annual spend over \$100,000 and assesses the risk of modern slavery based on the prevalence of modern slavery within the supplier’s country of operation and primary product/service provided by the supplier.

In FY24 we completed an inherent risk assessment on all Tier 1 suppliers onboarded between 1 June 2023 to 31 December 2023, who had not been captured by previously completed inherent risk assessments. A total of 85 suppliers were assessed, with 0 returning a critical risk rating, 16 returning a high risk rating, 54 returning a medium risk rating, and 15 returning a low risk rating.

The inherent risk ratings inform the type of due diligence undertaken for each Tier 1 supplier. Those returning high or critical inherent risk assessment are flagged for immediate participation in self-assessment questionnaires (SAQs) and potential audits. Those Tier 1 suppliers with a medium or low inherent risk rating are required to participate in SAQs at varying frequencies. The SAQ results help to inform selection of Tier 1 suppliers to be audited. Full details on assigning due diligence practices is provided on pages 26 and 27.

We intend to complete an inherent risk assessment around July each year to capture any new Tier 1 suppliers onboarded, or Tier 1 suppliers who have met the \$100,000 spend threshold during the previous 12 months.



Ron Webb, Process Controller, KCGM, Kalgoorlie Production Centre

## Case Study: Ongoing renewable energy supply chain assessment

Due to the global demand for solar panels and other green energy related infrastructure, there is some concern about the origin and manufacturing of renewable energy components and the risk of modern slavery within these supply chains.

Northern Star is currently expanding its renewable energy installations across multiple operations in Western Australia, including installation of solar panels at one of our Yandal operations. Given the general concern around modern slavery existing in renewable product supply chains, we approached the Tier 1 supplier responsible for our solar array installation and requested their support in undertaking a deep dive into their supply chain, representing Northern Star's Tier 2 suppliers. The aim of this pilot assessment was to understand the modern slavery risk in the supply chain for the production and supply of the solar panel components being installed at our operations. We examined a subset of the total supply chain related to the production, supply and delivery to our operations of the solar panels only.

The Tier 1 supplier was highly engaged and cooperated fully with our independent external consultant to map their suppliers (i.e. our Tier 2 suppliers) and verify risks of modern slavery within the solar panel supply chain. In our initial assessment the Tier 1 supplier identified six Tier 2 suppliers related to solar panel procurement, all based in Australia, one of which was a third party distributor. This necessitated us also examining the suppliers to that Tier 2 supplier (i.e. our Tier 3 suppliers), to ensure we captured modern slavery risks

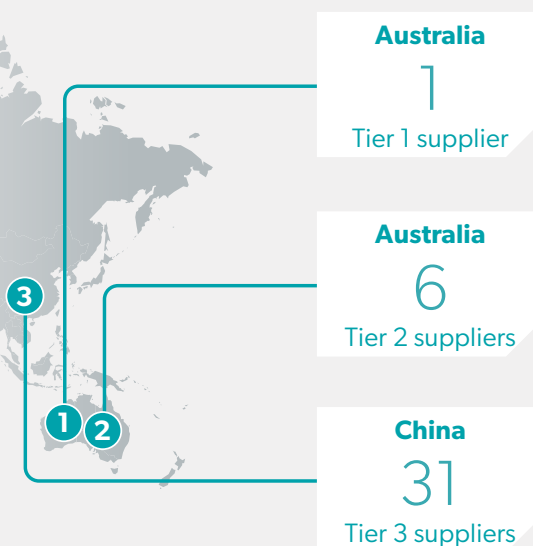
associated with the manufacturing of that part of our solar panel supply chain.

With assistance from our Tier 1 supplier, our independent external consultant approached the distributor (our Tier 2 supplier) about completing a similar assessment, looking at their suppliers of solar panel components and manufacturing (our Tier 3 suppliers). Once again, our request was received positively, and full support was given. Following a supply chain mapping and inherent risk assessment process we were able to identify 31 manufacturing plants and component suppliers (our Tier 3 suppliers) based in China with a critical or high risk of modern slavery.

We are continuing to work collaboratively with our Tier 1 supplier to further investigate the risks of modern slavery at these 31 facilities. Initially, this will be via a detailed SAQ process undertaken on a selection of ten suppliers, verified by an independent external consultant. We have shared the questionnaire we currently use with the Tier 1 supplier, for their use both now and in any future modern slavery due diligence they decide to undertake.

It was also identified that the Tier 3 supplier assessment omitted transportation and shipping companies related to solar panel delivery from the supply chain mapping and inherent risk assessment process. Further work is being done to rectify this. Details on the verification work and transportation and shipping related Tier 3 suppliers will be provided in the FY25 Statement.

Inherent Risk of Modern Slavery			
	Low/medium	High	Critical
Tier 1 Suppliers	1		
Tier 2 Suppliers	6		
Tier 3 Suppliers		20	11



## Our modern slavery risks

We use the UN Guiding Principles on Business and Human Rights (UNGPs) and its continuum of involvement (cause, contribute, directly linked) to inform our understanding of exposure to modern slavery risks within our operations and supply chain.

<b>Cause</b>	A company can cause modern slavery where its actions directly result in modern slavery occurring.	<b>Hypothetical example in the extractive industry</b> A company exploits workers at their mine site by withholding pay.
<b>Contribute</b>	A company can contribute to modern slavery where its actions or omissions facilitate or incentivise modern slavery.	<b>Hypothetical example in the extractive industry</b> A company negotiates excessively low rates with a labour hire supply company that can only be met if the labour hire company exploits employees.
<b>Directly linked</b>	A company may be directly linked to modern slavery through the activities of another entity it has a business relationship with. For example, a joint venture partner or supplier.	<b>Hypothetical example in the extractive industry</b> A company purchases mobile phones or computers from a supplier that were produced by a sub-supplier with cobalt sourced from mines using forced labour.

### Operations risk

Our corporate office, mine sites, and exploration projects are exclusively located in Australia or Alaska in the United States of America. The known prevalence of modern slavery in these jurisdictions is relatively low risk, in part due to companies being subject to robust labour laws protecting employees from being exploited by employers. Despite this, the potential for instances of modern slavery in the gold mining industry within these countries still exists.

We could contribute to modern slavery at our operations if we were to negotiate excessively low rates with a labour hire supply company. This could lead to the employees of the labour hire supply company receiving exploitative pay rates. Northern Star does not conduct this practice.



Haul Truck at Thunderbox Operations, Yandal Production Centre

We could be directly linked to modern slavery at our operations if a cleaning contractor were to utilise forced labour or debt bondage over its employees. Northern Star has not observed any conduct or obtained any information through its experience on site or in discussion with its cleaning contractors to suggest that its cleaning contractors utilise forced labour or debt bondage over their employees.

Our operations are subject to legislation, human resources policies, management practices and procedures that govern labour hire practices across our business. This compliance is supported by access to training and grievance mechanisms.

### Supply chain risk

Our highest exposure to modern slavery risks exists in our supply chain, through which we procure a variety of goods and services. Some countries have a higher prevalence of modern slavery and where our supply chain exists within such countries, Northern Star is at risk of modern slavery occurring within its supply chain.

Modern slavery can also result in supply chains if companies put commercial pressure on suppliers to such a level that the supplier exploits its workers by requiring long hours and low rates of pay.

We could contribute to modern slavery within our supply chain if we were to place impractical expectations on a supplier regarding delivery timeframes for particular goods, that could only be met by exploiting workers. Northern Star does not conduct this practice.

We could be directly linked to modern slavery if we were to source uniforms or personal protective equipment, such as gloves, from a supplier who uses forced labour, even if this occurred within our deeper supply chain. Northern Star's continuing efforts in identifying risks and the selection of Tier 1 suppliers to be audited is intended to ensure that this risk in our supply chain is mitigated. To date no suspected or actual instances of modern slavery have been identified.

Understanding where modern slavery risks may exist in our supply chain is imperative to being able to identify any actual instances of modern slavery. To better understand our supply chain, we conduct due diligence practices with support from an independent external consultant on our Tier 1 suppliers and select Tier 2 and Tier 3 suppliers.



# Action Taken to Address Risks

**This section details the actions we have taken to mitigate modern slavery risks during the reporting period, and our proposed response to any instances of modern slavery identified within our operations or supply chain.**

Northern Star takes a comprehensive, Group-wide, and multi-faceted approach to identifying and addressing modern slavery risks. This action is led by the Modern Slavery Working Group, with a view to continually improve the integrity and quality of our operations and supply chains.

In FY24 we worked with our independent external consultant to further enhance our risk-based approach to due diligence practices. This work produced a clear and more comprehensive matrix to assist us in communicating with our Tier 1 suppliers the likely due diligence process they may be exposed to as part of the requirements of our Supplier Code of Conduct. More information is provided in Supplier Due Diligence on page 15.

## Board oversight

Northern Star's Board has standing sub-committees comprised of Non-Executive Directors that provide scrutiny and guidance on the oversight, monitoring, and review of modern slavery risk management, namely the ARC and the ESS Committee.

The ARC assists and makes recommendations to the Board in relation to the Company's risk management framework, Risk Appetite Statement and the understanding of broad strategic risks to the Company achieving its strategic objectives. The ARC also monitors and reviews compliance with the Company's Code of Conduct and Whistleblower Policy, which is part of our corporate governance framework for ensuring that human rights are respected across the Company.

The ESS Committee assists the Board in implementing the Company's environmental, social and safety strategies and with the objective of ensuring that the Company conducts responsible and sustained business practices. In addition to overseeing the Modern Slavery Statement each year, the ESS Committee also have a standing 6-monthly action to review the progress of modern slavery due diligence practices, including SAQ and audit results.

## Executive responsibility

Our Chief Financial Officer has executive responsibility for the procurement and risk functions, including managing human rights risks across the operations, such as modern slavery risks.

## Modern Slavery Working Group

Our internal Modern Slavery Working Group oversees the identification and assessment of modern slavery risks within our operations and supply chains, and devises initiatives to address and mitigate these risks. This includes supplier due diligence practices, training and awareness initiatives, and effective data collection. The Modern Slavery Working Group comprises personnel from our Legal, Procurement, Company Secretarial and ESG Engagement teams.

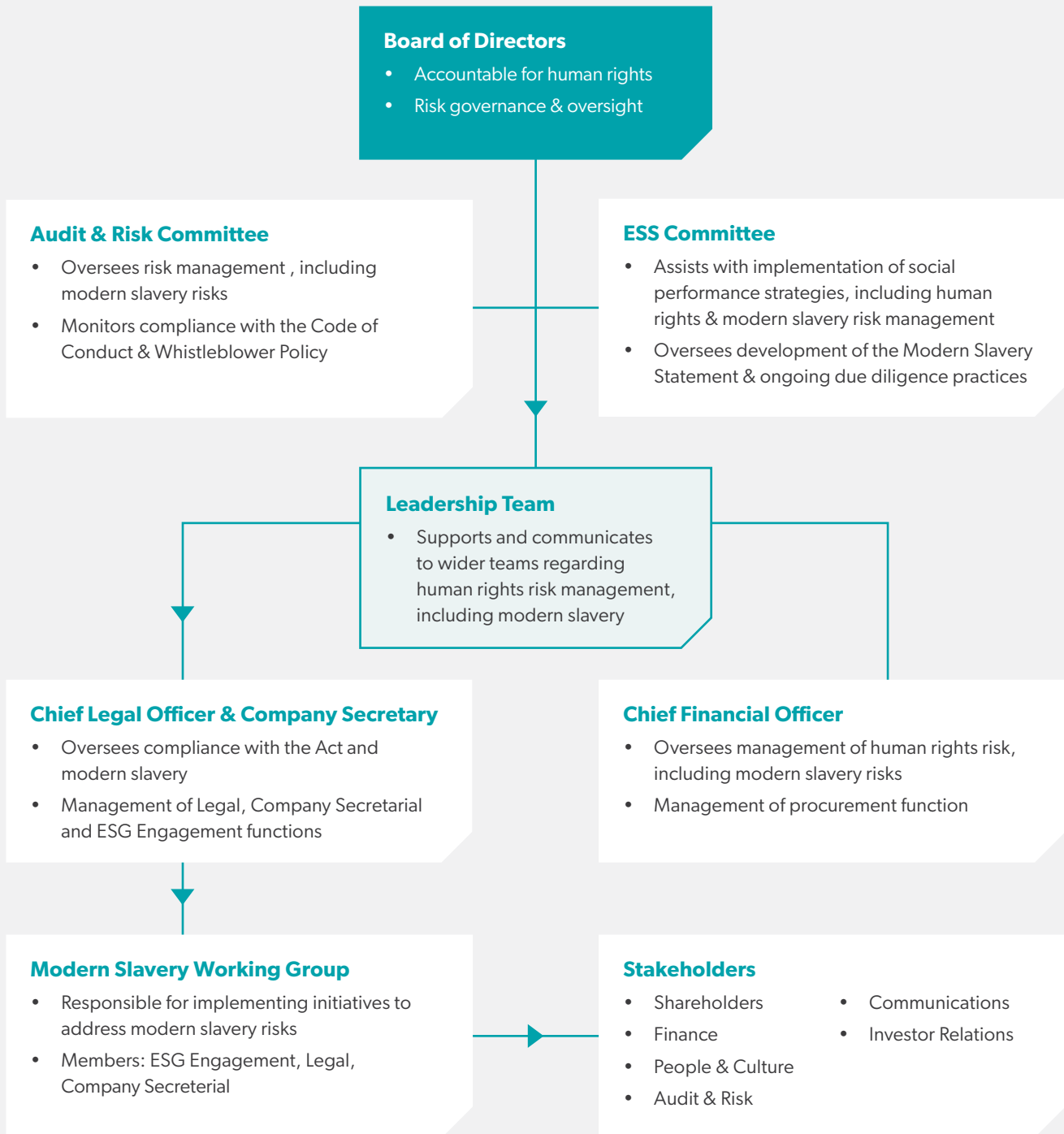


Kanowna Belle, Kalgoorlie Production Centre

## Corporate governance

The Northern Star Board of Directors (Board) has ultimate responsibility for ensuring the appropriate processes are in place to assess, monitor, identify and manage any modern slavery risks to Northern Star’s business, as well as processes for remediating and reporting on suspected or actual instances of modern slavery.

**Figure 6** Our corporate governance framework



## Policies & frameworks

Northern Star’s corporate governance policies provide the framework of standards required of our employees and suppliers, to ensure that across our operations from the Board down, human rights are respected. Our Human

Rights Policy together with the Code of Conduct form the basis for our approach to human rights management. They are embedded and regularly reinforced to instil appropriate behaviours within our business and supply chain.

Policy	Relevance to modern slavery
<b>Human Rights Policy</b>	The Human Rights Policy outlines the Company’s commitment to be a responsible business and comply with the United Nations Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights. It forms the basis for our approach to human rights risk management.
<b>Code of Conduct</b>	The Code of Conduct requires our employees and contractors to act fairly, honestly, transparently, with integrity and in compliance with all material applicable laws and regulations in fulfilling their duties and responsibilities.
<b>Supplier Code of Conduct</b>	The Supplier Code of Conduct sets out the expectations for our suppliers in relation to safety, environment, governance and business ethics, stakeholder engagement, human rights, and modern slavery.  Northern Star will actively seek suppliers who partner with us in identifying and implementing a plan to remediate any modern slavery offences or risks of human slavery in the supplier’s supply chain.
<b>Purchasing Policy</b>	The Purchasing Policy promotes transparent, equitable and competitive purchasing practices, considering social considerations, such as modern slavery risk identification and management, in the overall value assessment.
<b>Whistleblower Policy</b>	The Whistleblower Policy allows for the reporting of actual or suspected cases of human rights abuse, including modern slavery, through a breach of the Code of Conduct.  If a whistleblower report is made in relation to a supplier’s workforce, the allegation is investigated, and where substantiated, Northern Star would work with the supplier to ensure remediation occurs appropriately and promptly for the benefit of the workforce.
<b>Risk Management Policy</b>	The Risk Management Policy frames how Northern Star manages and mitigates risks to our employees and contractors.

More on our website:  
More on our policies and  
frameworks is available on  
[our website](#)

### Communication & implementation

All employees and long-term contractors required to undergo our Company Induction are provided training on the Human Rights Policy during the employment onboarding process and every two years thereafter.

All employees and long-term contractors required to undergo our Company Induction are provided training on the Code of Conduct during the employment onboarding process and every two years thereafter.

All suppliers can access the Supplier Code of Conduct via our website, alongside the purchase order standard terms and conditions.

All employees are provided training on the Purchasing Policy as part of their employment, refreshed every two years.

All employees and contractors are provided training on the Whistleblower Policy during the employment onboarding process and every two years thereafter.

All employees and contractors are provided training on the Risk Management Policy during the employment onboarding process and every two years thereafter.



## Grievance mechanisms & remediation

Northern Star's Whistleblower Policy facilitates and encourages the reporting of violations (or suspected violations) of the Company's Code of Conduct including the STARR Core Values or material legal or regulatory obligations, including actual or suspected cases of modern slavery.

Reports can be made by anyone including employees, contractors, suppliers, and members of the general public. Reports made through the whistleblower process are promptly investigated in an impartial and confidential manner, the results of which are reported direct to the Chair of the ARC and to the Board.

If a suspected instance of modern slavery is identified within our business or supply chain, we will investigate and respond to the concerns raised. Our modern slavery corrective action response protocol sets out the process to be undertaken when responding to suspected or actual instances of modern slavery.

If a whistleblower report is made in relation to a supplier's workforce, the allegation is investigated, and where substantiated, Northern Star would work with the supplier to ensure remediation occurs appropriately and promptly for the benefit of the workforce.

17

Number of whistleblower reports received in FY24<sup>7</sup>

0

Number of whistleblower reports related to modern slavery or other human rights abuses.



Lawrence Hunter, Safety Training Supervisor and Tom Penhall, Mining Engineer at Carosue Dam Operations, Kalgoorlie Production Centre.

<sup>7</sup> None of these involved human rights or modern slavery violation allegations

## Training & awareness

Modern slavery awareness training is required for all employees with a direct link to areas of our operation which may encounter modern slavery or carry higher than usual risks of modern slavery (**key accountable employees**). This includes people in our Human Resources, Procurement, Environment, Legal & Company Secretarial, and Social Performance teams, as well as all managers and key Executives, such as the Chief Financial Officer who oversees the Company's Procurement and Risk functions. The training module is available to all employees and contractors for voluntary self-enrolment, including Non-Executive Directors.

The online training module was developed in collaboration with Anti-Slavery Australia and includes an introduction to modern slavery and the Act together with actions Northern Star is taking to address modern slavery risks. The training also

details expectations for employees and where to seek additional information or guidance. Quiz questions are embedded throughout the training to test understanding of the content.

The training module is current for three years, after which employees are required to complete the course again. 273 key accountable employees, for whom the training is mandatory, have completed the training module out of a total 338 (81% completion rate). The outstanding employees are due to complete the training by 31 December 2024.

All five Non-Executive Directors who were members of the Company's ARC or the ESS Committee at 30 June 2024 have also completed the training. In addition, 88 employees self-enrolled and completed the training voluntarily.

In FY24 we had planned to expand the scope of human rights training with the development of a short

general awareness module for all new employees and contractors as part of the onboarding process. This training module was intended to be more concise than the modern slavery awareness training module described above. Upon review of the current onboarding processes and training modules required for new employees and contractors, it became evident that this was not a suitable format for general modern slavery awareness. Instead, awareness is spread via the existing communications network across Northern Star. For example, utilising media screens in offices and dining rooms, and communicating with employees about Anti-Slavery Day via our employee communications platform. In addition, our current training module remains available to any employee to complete on a voluntary basis, and we regularly promote the availability of this training module to our employees on the intranet and communications network.



## Supplier due diligence

Following the inherent risk assessment, Northern Star seeks to understand the actual modern slavery risks associated with our supply chain and where necessary take steps to mitigate any risks identified.

The inherent risk ratings applied to a Tier 1 supplier determines the form of due diligence undertaken to further explore the risk of modern slavery with a Tier 1 supplier.

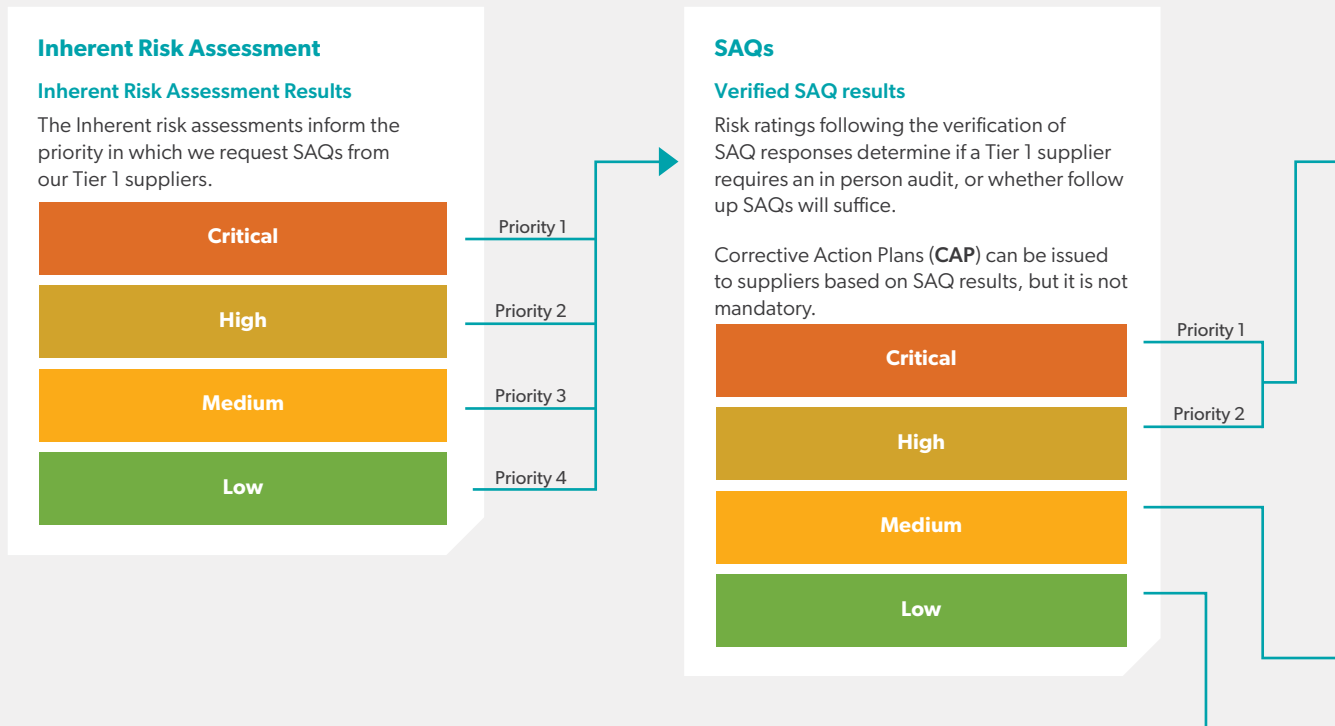
Suppliers returning a critical or high inherent risk rating are flagged for immediate participation in a SAQ. Those suppliers returning a medium or low inherent risk are also required to complete a SAQ, although they are assigned in a subsequent batch of requests. The verified results from the SAQs identify which suppliers require audits, and the frequency with which follow up SAQs are required. Figure 7 illustrates this process and details about each stage of the process provided in the subsequent sections.

## Ongoing supply chain management

In FY24 we undertook a data cleansing initiative to review Tier 1 supplier details, ensuring contact details and responsible persons were updated. This work aimed to improve the response rate to our SAQ requests by ensuring the correct persons within a supplier organisation received the requests.

Northern Star is currently implementing vendor management software to assist in contract and supplier compliance and to assist in managing modern slavery risk, to be utilised in FY25. This software will provide Northern Star with a centralised procurement platform housing all the vendor information in one place. The automated data gathering process is intended to support robust supply chain reporting and monitoring modern slavery risk issues.

**Figure 7** Modern slavery risk assessment and due diligence practices.



## New suppliers & tender requirements

Northern Star is committed to responsible sourcing through considering health, safety, environmental, social and governance criteria. We believe that this should be taken into account in our tender process and awarding of contracts. Our tender process requires selected prospective suppliers to disclose key details of their workplace health & safety, environmental, social responsibility, and other relevant practices. In addition, we have in place a detailed internal ESG screening tool which can be used to better understand how our prospective suppliers may mitigate modern slavery risks.

Our process for onboarding Tier 1 suppliers includes the requirement for all Tier 1 suppliers to confirm compliance with our Supplier Code of Conduct

which reinforces our expectations on our Tier 1 suppliers with regards to safety, environment, and social performance governance, including human rights and modern slavery risk management.

## Self-Assessment Questionnaire (SAQ)

As previously discussed, SAQs are utilised to further explore the modern slavery risk for all suppliers following the inherent risk assessment. The results of each SAQ are verified by our independent external consultant to ensure validity of answers and confidence in the final risk rating applied to each supplier. To ensure we are effectively prioritising our efforts in collecting, interpreting and measuring data, suppliers assigned a low-risk rating following verification are exempt from further due diligence practices the following year.

In FY24 we requested 156<sup>8</sup> suppliers to complete SAQs, from three distinct groups:

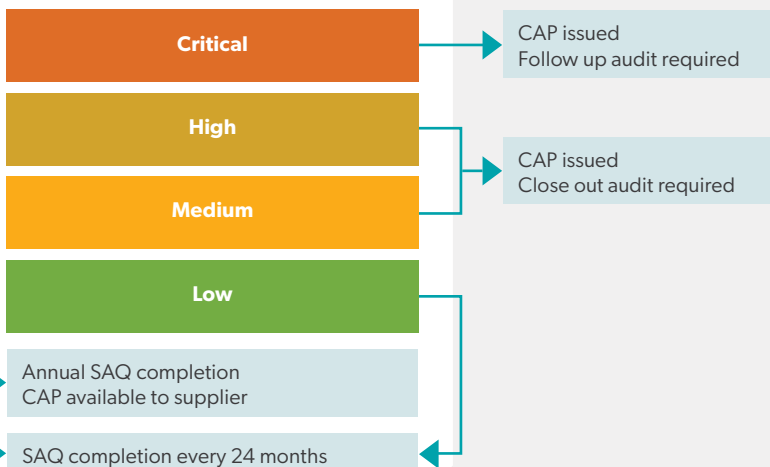
- 64 suppliers who failed to respond to the SAQ request in FY23;
- 23 existing suppliers who returned verified SAQ scores of high or critical inherent modern slavery risk following the FY23 SAQ request; and
- 69 new suppliers who were deemed to have a medium or high inherent modern slavery risk following the FY24 inherent risk assessment.

As at 30 June 2024 79 responses have been received and verified. Only one of our suppliers has refused to complete the questionnaire. Our process for responding to refusals is detailed on page 29.

### Audits

#### Audit results

CAPs are issued following audits for any critical, high or medium risk Tier 1 suppliers. Critical Tier 1 suppliers will require a follow up audit, while suppliers with a high or medium result will be subject to a close out audit to verify all CAP actions were complete.



<sup>8</sup> One of the SAQ requests was submitted in July 2024.



Elizabeth Gannaway, Receptionist &  
Jo Foster, Senior Receptionist, Perth Office

### Audits & corrective action plans

We believe it is important for auditors to have good local knowledge of legislation and regulations with which our suppliers and their sub-suppliers must comply. We engage an independent external consultant as auditor with certified auditors located in over 100 countries to conduct in-person audits on selected Tier 1 suppliers.

In FY24 we engaged 10 Tier 1 suppliers for in-person audits assessed against the Workplace Conditions Assessment Human Rights focus (WCA Human Rights) audit standard. No instances of modern slavery breaches were identified in any of the audits, though areas of improvement were found during many of the audits. CAPs were developed in consultation with the suppliers, outlining timelines for addressing the improvement items, based on the severity of findings.

Examples of areas for improvement for our Tier 1 suppliers include incorporating key policies into employee inductions, and conducting annual audits of compliance against human resources and social performance policies.

We complete follow-up audits on Tier 1 suppliers who are issued with a CAP once the close out date for the plan has been reached. The purpose of these audits is to ensure all required improvement actions were suitably implemented and issue a finalised audit score. Tier 1 suppliers are required to receive a score of 85% or above (thereby placing them in the high performing category) for the audit to be considered completed.

10 audits were completed in FY24, with 6 suppliers achieving an audit score of over 85%. The other 4 suppliers were issued with a CAP to address items identified during the audits, one CAP has since been completed. The 3 suppliers with active CAP are being provided with ongoing monitoring and support by Northern Star to ensure all action items are addressed within the agreed timeframe.

17 Tier 1 audits have been completed in total since due diligence practices began in 2021 with 7 follow-up audits being completed on those suppliers issued with a CAP. The follow up audits found that suppliers had addressed all action items and therefore achieved an audit score placing them in the high performing category.



### Supplier refusal to participate in due diligence practices

We continue to encounter Tier 1 suppliers who refuse to participate in due diligence practices, most commonly SAQs. To standardise our response to such refusals, we have developed procedures clearly outlining the process to be followed if a Tier 1 supplier refuses to participate in a SAQs or in-person audits:

- the Supplier Refusal to Audit Procedure, and
- the Supplier Refusal for SAQ Procedure.

These procedures were developed to complement our Supplier Code of Conduct and outlines the consequences for Tier 1 suppliers who do not engage, including potential to terminate contracts.

The procedures focus on communication and collaboration with Tier 1 suppliers in the first instance, ensuring that support and educational resources are provided to assist Tier 1 suppliers in engaging. This can include providing training materials, clarifying the supplier's obligations under the Supplier Code of Conduct, or modifying audit scopes where appropriate.

Should these initiatives fail to resolve the lack of engagement, and the risks of modern slavery are deemed to be at a level such that an audit is considered necessary to confirm that the risk of modern

slavery existing within the supplier's business is in fact low, the procurement team will consider sourcing the goods or services from alternative suppliers until such time as the supplier agrees to undergo an audit.

To continue sourcing goods or services from a Tier 1 supplier who refuses engagement, under the Supplier Refusal to Audit Procedure the Chief Financial Officer is able to waive Northern Star's requirement to participate in due diligence practices including an audit. Any such waiver clearly identifies the benefits for Northern Star's operations in continuing supply, notwithstanding the reduced ability to assess the risk of modern slavery existing within the supplier's business because a Modern Slavery audit was not undertaken.

In FY24 we did not have any Tier 1 suppliers refuse our request for an audit, however one supplier was hesitant to cooperate, and our procurement team utilised the Supplier Refusal to Audit Procedure to encourage the supplier to cooperate. The supplier has since accepted the request and is scheduled to undergo an audit in early FY25.

In relation to some Tier 1 suppliers, we continue to receive no response, or receive a refusal to participate in, our SAQ process and we will be addressing this in FY25 in line with our Supplier Refusal for SAQ Procedure.

## Contract termination

Northern Star's preference is to work collaboratively with any Tier 1 supplier who continues to refuse to engage in our modern slavery due diligence practices. We aim to identify the underlying reasons for the lack of engagement and share our knowledge and resources to assist our suppliers to participate. This proactive effort will address the risk of modern slavery more than terminating contracts, which we believe is unlikely to modify a supplier's business practices.

If a Tier 1 supplier continues to disengage, an assessment is conducted to determine if we will continue to procure from the supplier in the future. Our Chief Financial Officer has the discretion to terminate contracts following this assessment.

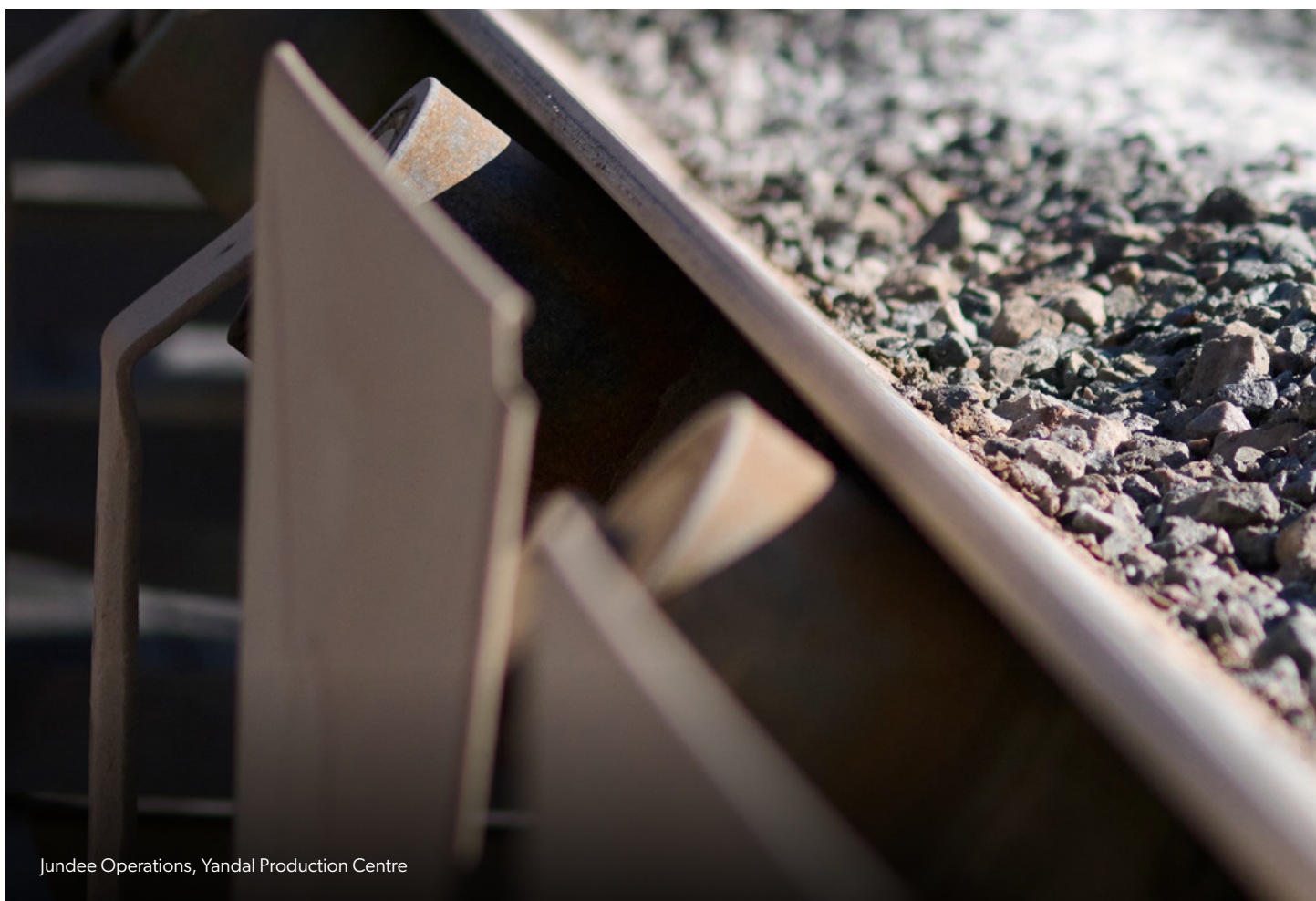
Alternative Tier 1 suppliers who willingly collaborate with Northern Star on modern slavery risk will be shown preference for procurement contracts.

No contracts with Tier 1 suppliers were terminated in FY24 as a result of refusing to engage in modern slavery due diligence practices or due to audit corrective actions plans not being accepted or implemented.

## Investigation & remediation

Northern Star's Modern Slavery Response Protocol (**Protocol**) guides our response and actions should modern slavery be identified in our operations' supply chain. The Protocol outlines the key steps to be taken in responding to suspected or actual instances of modern slavery and includes template corrective action plans such as unacceptable recruitment practices, inadequate working or living conditions, and penalties or threats.

We did not identify any suspected or actual instances of modern slavery in FY24.



Jundee Operations, Yandal Production Centre

## Collaboration & engagement

We continued to collaborate and share information with a variety of stakeholders throughout FY24.

### Industry associations

We participate in industry groups and other initiatives that encourage the sharing of knowledge and experience to aid in building best practice approaches including the Human Rights Resources and Energy Collaborative; and the Gold Industry Group. These National groups facilitate the sharing of knowledge and working together with other organisations within the extractives industry to develop best practice approaches to human rights.

### Industry expertise

We continue to utilise an independent expert consultant in responsible sourcing and supply chain solutions to assist us with assessing modern slavery risks within our supply chain, including completing SAQs and on-site audits. The role of this independent external consultant continues to be an integral stakeholder in our modern slavery risk management, and their expert knowledge helps inform the continual improvement of our supplier risk management processes.

### Suppliers

We work with our Tier 1 suppliers to promote and develop a deeper understanding of Northern Star's standards in relation to human rights and modern slavery risks. This includes providing educational resources, training, or support; collaborating on bespoke human rights or modern slavery projects; and issuing corrective actions plans following SAQs or audits. The case study on page 17 details a specific example of collaboration and engagement with our suppliers.

### Investors

We provide responses to ad hoc investor queries on our approach to assessing and addressing modern slavery risks within our business and supply chain as well as participating in ESG benchmarking surveys covering modern slavery and human rights management.





# Assessing Effectiveness

**Northern Star recognises the importance of evaluating the effectiveness of all the actions we take to ensure continuous improvement of our modern slavery risk management practices.**

This can be challenging as limited visibility and influence can cause modern slavery to become more difficult to identify and address deeper in a supply chain and modern slavery practices are often intentionally hidden. This creates difficulty in developing simple qualitative indicators or performance metrics.

We consider an effective response to modern slavery to be the ability to detect and address modern slavery risks within our operations and supply chain. From FY25 we will monitor this via performance metrics such as those identified in Table 8. We will consider goals for each metric to clearly articulate what we consider an effective result to be.

These will be reported in the FY25 Modern Slavery Statement.

We also regularly seek out stakeholder feedback:

- from our employees through confidential biennial culture surveys;
- from our suppliers mainly through their dealings with our purchasing and procurement teams; and
- through engagement with key investors and proxy advisers in relation to the Company's performance, both generally and on our sustainability and human rights commitments.



**Table 8** Performance Metrics proposed for use from FY25

Category	Metric	Indicative past performance		Commentary
		FY24	FY 23	
Training	% of key accountable who have current modern slavery awareness training	81%	61%	The training module requires completion every 3 years
	% ESS & ARC Board Committee members who have current modern slavery awareness training	100%	100%	The training module requires completion every 3 years
Supplier due diligence	# SAQs issued to suppliers for completion	156	131	63 of the FY24 SAQs issued were to suppliers who failed to respond in FY23
	% responses received for SAQs issued	51%	37%	
Audits	# audits <sup>9</sup> completed	10	1	The number of audits reported in the FY23 Modern Slavery Statement included follow-up audits
	# corrective action plans issued	4	1	
	# follow up audits conducted, verifying CAP actions have been satisfactorily completed <sup>10</sup>	1	2	
Corporate governance	# suppliers audited against Supplier Code of Conduct	0	0	
	% audited suppliers who returned a satisfactory result	n/a	n/a	
	# whistleblower reports received	17	10	Prior to FY24 this was reported in the Northern Star Annual Sustainability Report
	% of whistleblower reports received that concerned alleged modern slavery	0	0	

<sup>9</sup> This figure does not include follow-up audits completed during the year.

<sup>10</sup> This metric looks at follow up audits completed on suppliers who may have been audited in previous years, pending the timeframe given to complete corrective actions. For example, a supplier audited in FY23 may have received a corrective action plan with 12 months to complete actions, so the follow up audit occurred in FY24.

# Planned Actions for FY25

In FY25 we intend to complete the following actions:

- 100% completion of our modern slavery awareness training by the senior leadership team and all our Non-Executive Directors.
- Audit at least four Tier 1 suppliers who are labour hire companies and long-term contractors providing services to Northern Star against governance aspects within the Supplier Code of Conduct and confirm progress against any corrective action plans issued.
- Refresh our inherent risk assessment across all Tier 1 suppliers, to ensure the most up to date product and country risk profiles are considered.
- Set goals for effectiveness, where applicable, and measure our performance against the key performance metrics detailed in Table 8.
- Assess and enforce our Supplier Refusal to SAQ Procedure in relation to continued non-responses or refusal to complete SAQs.
- Utilising vendor management software to achieve enhanced assessment of ESG performance by our Tier 1 suppliers when awarding contracts via the tender process.

We will report our progress against these actions in the FY25 Modern Slavery Statement.





Janine Cameron, Approvals & Closure Specialist at KCGM, Kalgoorlie Production Centre

# Glossary

## **The Act**

Australian *Modern Slavery Act 2018* (Cth).

## **ARC**

Audit & Risk Committee.

## **Board**

Board of Directors.

## **CAP**

Corrective action plan.

## **ESG**

Environment, Social & Governance.

## **ESS Committee**

Environmental, Social & Safety Committee.

## **FY23**

Financial year ended 30 June 2023.

## **FY24**

Financial year ended 30 June 2024.

## **FY25**

Financial year ending 30 June 2025.

## **Group**

Northern Star Resources Ltd and all of its wholly owned subsidiaries.

## **Key accountable employees**

Group employees with a direct link to areas of our operations which may encounter modern slavery or carry higher than usual risks of modern slavery. This includes our human resources, procurement, environment, legal & company secretarial, and social performance teams, as well as all managers and key Executives, such as the Chief Financial Officer to whom the procurement function reports.

## **Modern slavery**

An umbrella term used to describe serious exploitation and human rights violations. Practices that constitute modern slavery can include:

- human trafficking;
- slavery;
- servitude;
- forced labour;
- deceptive recruiting for labour or services;
- debt bondage;
- forced marriage; and
- child labour.

## **Non-binary**

Includes gender identities that demonstrate a diversity of expression beyond the binary framework. In addition, purely for the purposes of the data disclosed in this document, we have included the expression "Non-binary" the individuals who, when invited to identify their gender, responded with either "prefer not to say" or prefer to self-describe".

## **SAQ**

Self-assessment questionnaire.

## **Tier 1 Supplier**

Suppliers that Northern Star engages directly to provide goods or services to our operations. Suppliers and contractors are interchangeable expressions throughout this Statement.

## **Tier 2 Supplier**

Suppliers that are engaged by Northern Star's Tier 1 suppliers to provide goods or services. Suppliers and contractors are interchangeable expressions throughout this Statement.

## **Tier 3 Supplier**

Suppliers that are engaged by Northern Star's Tier 2 suppliers to provide goods or services. Suppliers and contractors are interchangeable expressions throughout this Statement.

## **UNGPs**

United Nations' Guiding Principles on Businesses and Human Rights.

