

# Modern Slavery Statement

## 2022-2023

**At Greater Whitsunday Alliance Limited (GW3) and its entity C-Res, we see respecting human rights as critical for our ability to contribute meaningfully to society and we have an expectation that all businesses with whom we work respect human rights throughout the value chain.**

**Both GW3 and its subsidiary entity, C-Res adopts the Australian Modern Slavery Act definition of modern slavery, including the eight types of serious exploitation (which include human trafficking), each of which has a clear definition in international or Australian law. We have a responsibility to work collaboratively with our suppliers, customers, workforce and external stakeholders to increase our understanding of modern slavery risks and the role we can play in seeking to address them.**

This is GW3's third Statement and C-Res' fourth Statement in response to the Australian Modern Slavery Act. This Statement describes the activities we have undertaken throughout the 2023 financial year to strengthen our processes and better understand the risks of modern slavery and human trafficking in our operations and supply chains.

This statement jointly outlines both the parent entity (GW3) and subsidiary entity (C-Res) responses to modern slavery risks.

## About

### GW3

Greater Whitsunday Alliance Limited (GW3) is company limited by guarantee. GW3 has four shareholding members: Mackay, Isaac and Whitsunday Regional Councils and the Greater Whitsunday Council of Mayors.

GW3 is an independent, regional economic development body that represents and advocates for the Greater Whitsunday region (comprising of the Mackay Isaac Whitsunday local government areas) with all levels of government and with key industry and community decision makers.

The organisation is led by an independent governance board; has a Chief Executive Officer and an administration, communications and project team located across the entire region.

### C-Res

C-Res is a wholly owned subsidiary of Greater Whitsunday Alliance (GW3) and was first established in 2012 to deliver the Local Buying Program in Queensland for BMA. Since then, the Local Buying Program's continuing success has seen it expand to all BHP Minerals Australia core assets. During financial year 2023, the Local Buying Program was delivered through strategic partnership between C-Res and the following BHP Minerals Australia core assets (including Queensland Coal: BMA) and Stanmore Resources Limited:

- BHP Mitsubishi Alliance (BMA) - Queensland
- BHP Operational Services
- NSW Energy Coal – New South Wales
- Olympic Dam – South Australia
- Nickel West (NiW)
- Western Australia Iron Ore – Western Australia
- Western Australia Petroleum – Western Australia
- Stanmore Resources Limited (*this statement only applies to Stanmore Resources Limited from 1 July 2022 to 30 December 2022 as part of the contracted transition following BMC Divestment to Stanmore Resources Limited that occurred in FY2022.*)

Through this strategic partnership, the Local Buying Program has supported regional economic development of the communities in which BHP and BMA operate.

The Local Buying Programs in each state of Australia we operate, have independent Local Buying Foundations that work to build sustainable business communities for the future. Building on local capabilities and opportunities for growth in current and emerging industries, the Local Buying Foundation supports projects and programs which facilitate workforce development, innovation and the productive capacity of business and industry to grow the potential of their regional economies.

These Foundations are run by representatives of the communities of interest to ensure investments have the greatest possible impact. For more information about the Foundations including funding rounds, funding opportunities and governance visit the website

– [www.localbuyingfoundation.com.au](http://www.localbuyingfoundation.com.au)

## Vision

### GW3 Vision, Role and Governance

GW3's approach to economic development is guided by our vision and role and supported by a strong governance framework which underpins everything we do and our approach to operations/

GW3's vision is: *Making the Mackay Isaac Whitsunday region strong for generations.*

The vision is supported by our core role of:

*Advocate:* Be a strong voice for economic development opportunities on behalf of the region

*Attract:* Encourage investment, funding and business growth in the region

*Collaborate:* Convene, partner and facilitate alignment of key stakeholders to advance collective objectives

*Inform:* Track and consolidate economic development resources and data to inform strategic decisions.

The vision and role is upheld by a strong governance framework to support the sustainable operations of our organisation and to ensure there is a focus towards mutual and community benefit.

### C-Res Vision, Core Role and Values

The wellbeing of our people, the communities in which we live and work, and the environment must be considered in everything we do and our beliefs and values uphold that.

We look to integrate our values into our decision-making and actions by considering the needs of our many stakeholders and finding new and innovative solutions that create mutual benefit.

Our approach is defined by our *Vision, Purpose and Values*. These clearly articulate the foundation to develop and implement sustainable and manageable practices in everything we do.

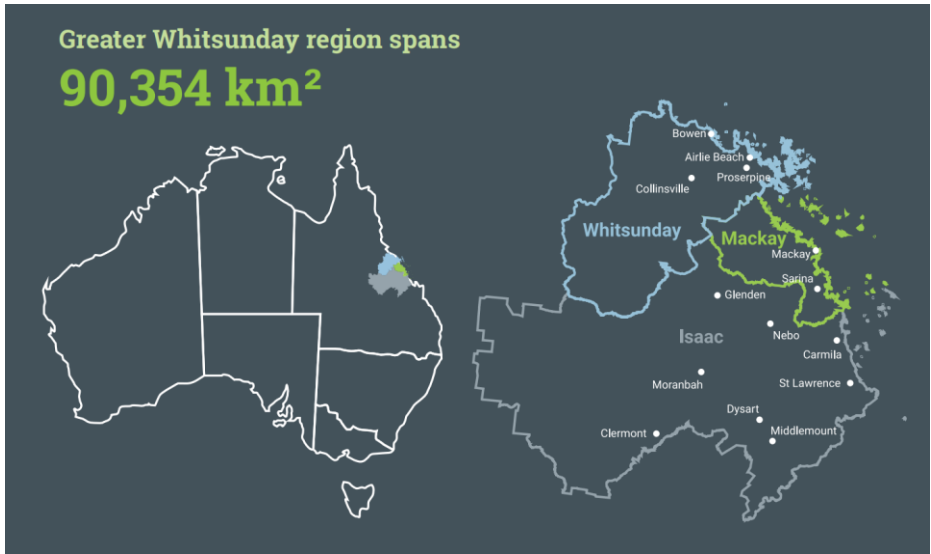
We recognise that operating in a manner that respects human rights and with a commitment to strong governance and anti-corruption is not only important to the sustainability of our business but enables us to better understand and address modern slavery and human trafficking risks.



## Entity Structure

### GW3 organisational structure and operations

GW3 is an Australian company that operates in the Mackay, Isaac and Whitsunday local government areas in Queensland. The head office is in Mackay, with satellite offices in Clermont and Airlie Beach.



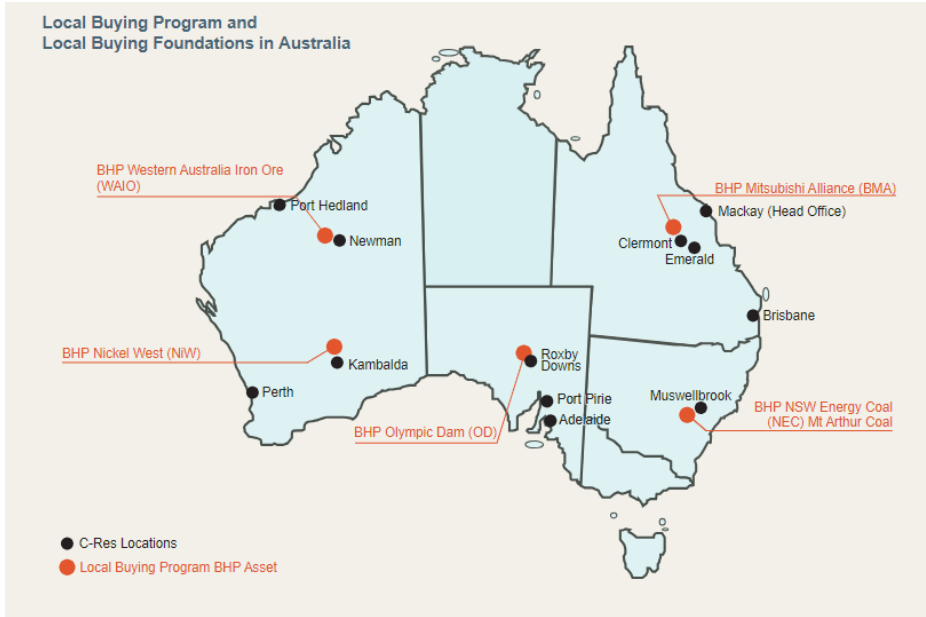
**C-Res organisational structure and operations**

C-Res is an Australian company that operates nationally and is a wholly owned subsidiary of Greater Whitsunday Alliance (GW3).

C-Res is also the Trustee of the QLD, NSW, SA and WA Local Buying Foundations, all of which are registered with the ACNC.

We strategically act as an agent for BHP for their off-contract procurement aimed at small local businesses in communities where BHP operate.

Our principal operations and locations are below:



## Supply Chain

### GW3

GW3 has identified that our direct operational supply chain is at a low level of Modern Slavery risk. Our supply chain is very minimal and predominately regional Queensland or Queensland based, with no off-shore procurement or jurisdictional risk identified over the last 12 months.

In FY23, GW3 contracted with approximately 90 suppliers. After analysis of spend distribution of these suppliers, the main spend categories were: IT and Communications; Operational; Marketing and Professional Services.

All new Requests for Quotes or Tenders include a statement about GW3's ongoing commitment to addressing modern slavery requirement and a request for vendors to complete a Modern Slavery Questionnaire to inform modern slavery risk assessments.

All Modern Slavery Questionnaires received were compliant with GW3's commitment to address Modern Slavery.

GW3 engages with our external suppliers, including consultants, agents, contractors and service providers to make them aware of, and expect their compliance with, our human rights commitments, through appropriate contractual arrangements and procurement principles. We strive to ensure our stakeholders also respect our commitments to uphold human rights.

### C-Res

Our direct operational supply chain is very minimal and every vendor is required to undertake a due diligence process to ensure there are no human rights-related risks.

While we are not directly involved in activities such as carrying out services onsite at BHP and Stanmore operational sites, we recognize that the sector in which BHP and Stanmore operate in, have known modern slavery risks. All LBP suppliers (BHP and Stanmore direct supply chain) and LBF funding applicants are required to undertake a stringent due diligence process which is reviewed annually to minimize anti-corruption and human rights-related risks.

The *Local Buying Program Operating Guidelines* sets minimum mandatory requirements for suppliers of non-traded goods and services, including:

- Registration prior to being set up as an eligible LBP supplier to BHP
- Meeting minimum governance and ethical compliance requirements for suppliers, including due diligence checks

BHP developed an Ethical Supply Chain and Transparency Guide in FY2020, which is available to all direct and indirect suppliers at [bhp.com](http://bhp.com) to support their commitment to continuous improvement and collaboration with suppliers. The Guide's intent is to collaborate with and enhance the capability of their suppliers in meeting their requirements under their minimum requirements for suppliers. It complements the relationships BHP and C-Res have with suppliers and the ongoing work of BHP's Procurement team. C-Res completed the implementation of this guide in all supplier registrations in FY2022 and opted into daily operations ongoing.

## Policies and Governance

### GW3

Employees and directors of GW3, as well as external contractors, are guided by our Vision and Core Role as well as our Board Charter and Code of Conduct policy.

With a small operational team and limited supply chain, GW3 is well placed to actively encourage and monitor suppliers to maintain fair and equitable business practices in keeping with the Modern Slavery principles.

GW3 has an extensive policy and procedure framework designed to mitigate all forms of risk associated with employing, managing and retaining a geographically dispersed workforce. This framework provides confidence in the quality of our people and supports our belief that our people pose minimal modern slavery-related risk. All GW3 employees must comply with this policy framework and review policies twice yearly.

Specific policies and procedures designed to support our Modern Slavery position include:

- Board Charter
- Code of Conduct
- Anti-Discrimination, Harassment-Free Workplace and Equal Employment Opportunity Policy
- Domestic or Family Violence Support Policy
- Grievance Policy
- Leave Policy
- Mental Health Policy
- Workplace Health and Safety Policy

These policies are reviewed every two years by the Finance, Audit and Risk Committee to ensure relevance and compliance.

### C-Res

Every member of our workforce who works at or supports what we do (including Stanmore during divestment transition) is guided by our *Vision, Purpose and Values* as well as the *C-Res Code of Conduct* and BHP's *Our Charter, Our Code of Conduct (Our Code)* and the *Supply Our Requirements* standards.

All LBP suppliers working at BHP's operated assets are required to comply with BHP's health, safety, environmental and community (HSEC) standards.

All LBP Suppliers working at Stanmore's operated asset during divestment transition were required to comply with Stanmore's HSE, that was adopted from BMC HSE to ensure highest standard of HSE is being upheld.

C-Res is focused on how we can engage with and encourage LBP suppliers to maintain business practices and workplace standards that are comparable to our own.

In FY2023, we conducted activities to raise awareness about governance and compliance by continuing to undertake annual audits of supplier registrations and blocking the Supplier from using the LBP on first instance of non-compliance.

## Access to remedy

### GW3

Despite our limited supply chain, GW3 understands that human rights and modern slavery risks are present in businesses of all sizes. Stakeholders who have concerns about our commitment to our vision and role can address their issues directly with the CEO or the Chairperson of the Board as per the GW3 Grievance Policy. GW3 has received no notices of breaches to our commitment to human rights and modern slavery in the 2023 financial year.

#### C-Res

We have mechanisms in place to address the concerns of stakeholders who feel we have breached our vision, purpose and values or wish to raise other business conduct issues. All grievances and complaints can be addressed through our 'Complaints and Grievance Policy' located on our website.

Complaints and grievances and reports received are required to be logged in our register. This allows us to improve our investigation, management and analysis of issues and impacts. In FY2023, no complaints received through these mechanisms related to modern slavery or human trafficking.

Concerns about C-Res and LBP suppliers can also be made anonymously and in multiple languages via Ethics Point, a reporting service that enables anyone to lodge a concern. This service is available 24/7 to BHP workforce, external stakeholders and the public globally through bhp.com and country-specific hotline numbers. Ethics Point is supported by an ethics and investigations framework and central investigations team (within the Ethics and Compliance function).

We acknowledge and investigate, as appropriate, all concerns raised or logged through these mechanisms. Where concerns are investigated and substantiated, we take remedial actions, advise the reporter (as appropriate) and document the outcomes.

*Our values* prohibits any form of retaliation against anyone who raises a concern or participates in an investigation. No incidents of modern slavery or human trafficking in breach of our C-Res or LBP policies have been received into Ethics Point during FY2023.

Both BHP and C-Res recognise human rights risks are present in organisations of all sizes. We also acknowledge some organisations, including smaller enterprises, may face challenges with the implementation of management processes and procedures that provide adequate access to remedy for workers and other stakeholders. BHP and C-Res are committed to working collaboratively with these suppliers to understand their constraints and seek to find ways to support the provision of complaint and grievance mechanisms. Information on accessing Ethics Point is available for suppliers in the Ethical Supply Chain and Transparency Guide.

## Due diligence and risk management in our business

### GW3

As an organization, GW3 assesses and manages risk, including human rights and modern slavery through a formal risk register management framework. The GW3 Board and senior leadership team,



monitors the risk register, through a risk rating process at every board meeting and implements controls accordingly.

Each one of the organisation's policy and procedures are reviewed every two years by the Finance, Audit and Risk Committee to ensure relevance and compliance.

#### **C-Res**

We identify, assess and manage risks that either C-Res or BHP (and Stanmore during divestment transition) are exposed to, including human rights risks. The C-Res Board and Leadership Team monitors and, at least annually, will review the effectiveness of the C-Res Strategic Risk Register and internal controls.

In order to understand and manage the risks that C-Res or BHP (and Stanmore during divestment transition) through the LBP is exposed to, we utilise a risk rating process in our Strategic Risk Register. This rating process helps us to identify current risks (which may be strategic or operational in nature), as well as emerging risks. We assess risks, apply appropriate controls and review performance to enable risks to be properly managed.

Our annual internal and external audits evaluate the design and effectiveness of our sustainability processes. Results are considered in the development of action plans to address improvements where required. Results are reported to the C-Res Board and Leadership Team, which is responsible for the day-to-day management of C-Res.

## **Due diligence and risk management in our supply chain**

### **GW3**

Over the course of financial year 2023, GW3 continued to raise the awareness of human rights and modern slavery through our Request for Quote / Tender process. Additionally, the organisation champions mental health and wellbeing, ongoing professional development and a focus on workplace health and safety to support best practice business operations. Whilst we are unable to guarantee compliance within our indirect supply chain we deploy the following controls:

- Modern Slavery procurement questionnaire and GW3 position statement
- BHP Anti-Corruption and Conflict of Interest training for all GW3 staff undertaken in financial year 2023 (offered via our subsidiary company C-Res)

#### **C-Res**

In FY2023, we continued to build opportunities to engage and leverage relationships with BHP, Stanmore through divestment transition, our suppliers, and stakeholders to enhance recognition of human rights across their activities, alongside other issues such as mental health, business resilience, and increased employment and training. We recognise there are limitations to our ability to influence our indirect suppliers but that we have a responsibility to work constructively with our direct suppliers to build capacity both within their organisations and their own supply chains.

Controls include:

- Ethical Supply Chain and Transparency Guide – fully implemented FY2022 and adopted into daily operations ongoing

- Minimum requirements for suppliers to become an approved LBP Supplier
- Annual BHP Anti-Corruption & Conflict of Interest training for all C-Res staff undertaken in FY2023.

## Assessing effectiveness

### GW3

GW3 monitors effectiveness of our commitment to modern slavery through:

- Internal governance and due diligence processes including risk register; finance, audit and risk committee review; policy and procedures to guide procurement and organization actions.
- Procurement compliance through completion of Modern Slavery Questionnaires for assessment prior to awarding tenders; supply contracts/agreements including Modern Slavery clauses and Modern Slavery awareness education for procurement staff.
- Human Resources training and education to ensure the organisation's staff awareness of Modern Slavery risks are known and continue to improve.
- Thorough investigation of the reports of breaches to the organisation's commitment to Modern Slavery.

### C-Res

We regularly review the effectiveness of our governance and compliances processes by:

- Investigation and analysis of complaints and grievances and reports of issues received through our mechanisms (refer Policies and governance section)
- Conducting our internal audit program
- Conducting an annual review of all LBP suppliers
- Continuous improvement initiatives (recorded in a continuous improvements register)
- Engaging regularly and collaborating with BHP and other stakeholders

## Consultation

During the reporting period this statement covered, GW3 engaged closely with subsidiary entity C-Res to frame our expectations with regard to the statement and understand their approach to mitigating risks.

Wherever possible, GW3 and C-Res collaborated to ensure alignment between board reporting and engagement. There has been extensive consultation between GW3 and C-Res in the development of this joint statement.

### GW3

This joint statement has been reviewed and supported by the board of GW3 as the parent entity on Tuesday November 28, 2023. See attached minutes confirming Board of Director approval.

#### **C-Res**

This joint statement has been reviewed and supported by the board of C-Res as the subsidiary entity of GW3 on Tuesday October 17, 2023.

## **Looking forward**

### **GW3**

Despite the limited nature of our supply chain, GW3 will focus on maintaining compliance levels with our suppliers and continuing to improve awareness of human rights and Modern Slavery with our internal operations team.

In financial year 2024, GW3 will be rolling out a HR Salary Framework to ensure complete transparency regarding remuneration; professional development and work environment expectations. Additionally, the entire operational team will participate in the Mind Matters staff wellbeing program designed to tackle mental health concerns.

#### **C-Res**

We will be focusing our efforts on ensuring compliance with governance and due diligence processes by our organisation, our direct supply chain and all LBP suppliers.

Kylie Porter  
**Chief Executive Officer**  
**GW3**

November 28, 2023.