

1 ADDRESSING MODERN SLAVERY

Wiluna Mining Corporation Limited (Wiluna Mining, or the company) is committed to ensuring its supply chain is not linked to Modern Slavery and to address or mitigate risks. Wiluna Mining continues to develop its systems and guidance on the protection of Human Rights and the prevention of Modern Slavery in its work and for procurement from key Suppliers and Service Providers. These expectations are communicated directly to key goods and service providers.

The term Modern Slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern Slavery describes serious exploitation of people. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some occurrences of Modern Slavery. These practices may escalate into Modern Slavery if not addressed. The Australian Modern Slavery Act 2018 (the Act), defines Modern Slavery as including eight types of serious exploitation:

1. trafficking in persons;
2. slavery;
3. servitude;
4. forced marriage;
5. forced labour;
6. debt bondage;
7. deceptive recruiting for labour or services; and
8. the worst forms of child labour.

2 ABOUT THIS STATEMENT

In view of requirements of the Australian Modern Slavery Act 2018 (the Act), Wiluna Mining must annually publish Modern Slavery Statements and describe its actions to assess and address Modern-Slavery risks. This Modern Slavery Statement

- Addresses the Mandatory criteria prescribed by the Act.
- Is approved and signed by a member of the Wiluna Mining Board of Direction.
- Is provided to the Commonwealth Government.
- Considers learnings and continual improvements in future Modern Slavery Statements.

3 THE STATEMENT

3.1 Reporting Entity

Wiluna Mining Corporation Limited (Wiluna Mining) ABN 18 119 887 606 18 is the reporting entity. It is a Perth based, ASX-listed company which owns 100% of the Wiluna Gold Operation in the Northern Goldfields of Western Australia. There are no Joint Venture Partners in the Wiluna Gold Operation. The Registered office of Wiluna Mining is Level 3, 1 Altona Street, WEST PERTH, WA 6005.

3.2 Operation and Supply Chains

The Wiluna Gold Operation processes ‘free milling’ ore from reserves at the Wiluna, Matilda, and Lake Way (Williamson) open-pit mines and the Golden Age underground mine. Gold doré is produced on site. On shipping from site, i.e. ‘leaving the gate’, the gold becomes the property of the customer. Wiluna Mining is not involved in any Joint Venture for the production of gold doré.

The supply chain for the mining and mineral processing operation of Wiluna Mining includes a range of services and materials such as, but not exclusively:

- electrical power, diesel fuel.
- consumables or reagents from explosives to sodium cyanide.
- Information Technology equipment, personal protective equipment (PPE) and workplace clothing.
- service contracts for the deployment of equipment and skilled personnel in surface and underground mining.
- earthmoving, engineering, supporting professions, catering, and servicing of rostered accommodations.

The phases of exploration through mining to production of gold doré is supported by a supply chain as shown in Figure 1.

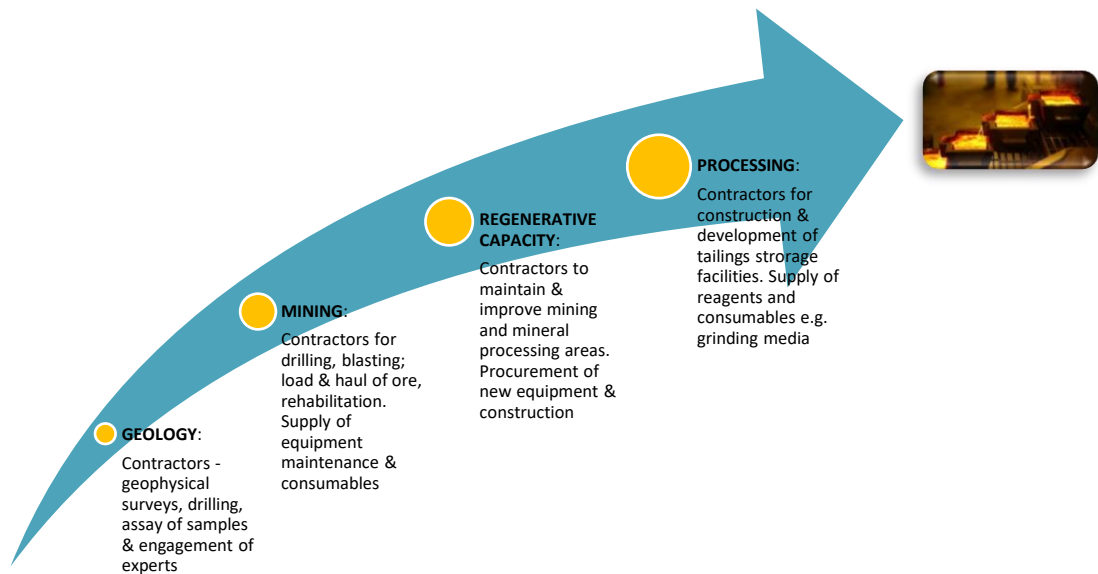


Figure 1 Support of Operation - Supply of Materials and Services

3.3 Risks of Modern Slavery Practices in the Operation and Supply

Wiluna Mining has a low risk of exposure to Modern Slavery as its corporate office and operational activity are only in Australia. For example, Wiluna Mining has considered the risks of engaging contractors with employees to undertake cleaning and catering services at site. These personnel are employed under Australian Law. Some IT equipment personal protective equipment (PPE) or workplace clothing used by Wiluna Mining may have been manufactured offshore, procured from local suppliers which support much of the mining industry in Australia.

Wiluna Mining has few roles for unskilled, temporary, or seasonal labour. All personnel working at the Wiluna Gold Operation are inducted. Induction material and processes are continually being revised, ultimately to make personnel aware of Human Rights, Modern Slavery risks, and accessibility of the Grievance mechanism for themselves and others. Children are not permitted to work or reside at site in accordance with Mining regulations.

The working hours of all personnel at site or in the Perth office are closely monitored and lengthy or excessive hours (absent of a high risk related to fatigue) may only be permitted by Senior Management for extenuating circumstances.

No personnel reside permanently at the Wiluna Gold Operation. Site accommodations are not guarded and personnel are free to arrive or leave.

Suppliers are chosen from a range of criteria, for provision of services or materials, through comparison of other tenders (where considered appropriate), for practicable estimates of timing, cost and application of terms and conditions prescribed in their contracts.

3.4 Actions to Assess & Address Modern-Slavery Risks

The Environmental, Social and Governance (ESG) framework of Wiluna Mining is crucial in the delivery of its Vision and Values. *Wiluna Mining values transparency, being open, honest in its communications with shareholders and stakeholders.* The Charters, Policies and Procedures of Wiluna Mining may be found at www.wilunamining.com.au/about/policies. These show its commitments to good governance and to address risks such as those related to Modern Slavery. The 'Governance Framework to Address Modern Slavery' at Wiluna Mining is shown in Figure 2.

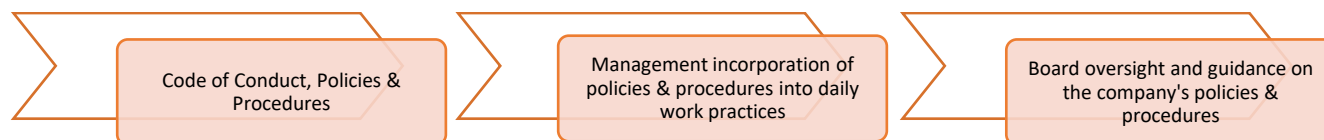


Figure 2 Governance Framework to Address Modern Slavery

Senior management has oversight of ESG performance, practices and systems, through feedback from its subcommittees, reporting, audits, site visits and scrutiny of the supply chain. Review mechanisms for this ESG framework are in place at Wiluna Mining for consultation and due diligence. It is management's objective to implement appropriate ESG practices into the business' existing key policies.

Wiluna Mining considers the interests of its stakeholders and some with a keen interest in Human Rights, or actions to prevent Modern Slavery (Figure 3). This may occur via regular meetings or through informal contact.



Figure 3 Stakeholder Map

To prevent Modern Slavery occurring at the operations and offices of Wiluna Mining, or in its supply chain, some of the measures include raising awareness through employee induction; application of the Code of Conduct; and access to the Grievance or Whistleblower Mechanism. Wiluna Mining is developing a Human Rights Policy, which will be effected through the Company's Employee and Manager Handbooks. Grievances which may be raised through incident reporting can be resolved at an Operational Level. Whistleblowing matters, as appropriate, are addressed and resolved in confidence to respect individual privacy. Recurring, serious concerns, or high-risk events are brought to the attention of senior management.

Wiluna Mining maintains its awareness of trends and concerns which may relate to Human Rights and or Modern Slavery through its participation in industry groups and forums.

3.4.1 Wiluna Gold Operation

The ESG framework at Wiluna Mining includes good-industry practices, in its employment of people and liaison with Communities of Interest, to maintain a low risk of Modern Slavery in the Company's workplaces.

The minimum terms and conditions for employment by Wiluna Mining are governed by Western Australian and Australian laws. Employees of site-based contractors e.g. for mining or catering are also subject to those Australian laws.

Wiluna Mining employs and sponsors individuals on visas. To fulfil the requirements of this process, Wiluna Mining must ensure and provide evidence that individuals being sponsored are paid in line with an Australian resident who is also employed by Wiluna Mining in the same role. Assessments are made to ensure applications and visa information is correct and the contract is in line with the requirements of the individual's visa.

3.4.2 Engagement of Suppliers and Service Providers

Suppliers are chosen from a range of criteria, for provision of services or materials, through comparison of other tenders (where considered appropriate) for practicable estimates of timing and cost. It is not necessary to engage suppliers which deliver at the lowest cost, nor within unrealistic and short timeframes. Approval for registration of new suppliers and service providers to Wiluna Mining requires an assessment of their risks such as safety and environmental issues, capability and commerciality. Modern Slavery assessments have been added to these criteria.

Wiluna Mining has adopted relevant Modern Slavery terms and conditions to the contracts in its supply chain. These are in place to ensure fair treatment or competition of suppliers or service providers. These terms and conditions will also make clear Wiluna Mining requirements to prevent Modern Slavery.

3.5 Assessment of Effectiveness in Managing Modern-Slavery Risks

Wiluna Mining relies on a wide range of suppliers and services. Approximately >95% of the Group's recent annual spend in its supply chain was from within Australia, of which approximately >90% were from within Western Australia.

There is the potential for Modern Slavery to exist in the supply chain to Wiluna Mining through the direct or indirect procurement of materials or services from overseas.

To control the risks of being directly involved in Modern Slavery practices, Wiluna Mining has focussed on its key Suppliers and Service Providers, by requesting their completion and return of a questionnaire for work related to:

- Accommodation services.
- Drilling or Mining.
- Supply of reagents for Mineral Processing.
- Energy.
- Mineral testing.
- Supply of PPE & work clothing.

Based on expenditure and the materials or services provided to support its mining cycle and production of gold doré, Wiluna Mining considers it has a low risk of Modern Slavery in its immediate supply chain.

At the time of writing this statement Wiluna Mining had not identified any occurrences of Modern Slavery in its operations, offices or supply chain for the 2019-2020 Australian financial year.

3.6 Process of Consultation with any Entities owned or Controlled

At Wiluna Mining, executives and board members have been briefed, to ensure they understand the statement process and the efforts by the company, to manage the risks of Modern Slavery within the operation and supply chain.

The relevant pillars of the business - Operations, Growth, Discovery and Corporate & ESG - have been consulted on managing risks of Modern Slavery.

The Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities is noted.

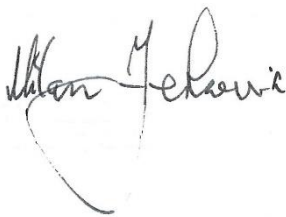
3.7 Other Relevant Information

Wiluna Mining is progressing with the revision of its terms and conditions for suppliers and service providers, aiming to improve oversight of their risk management on Modern Slavery and accessibility to the Grievance Mechanism of Wiluna Mining.

Wiluna Mining will continue to develop the public reporting of its oversight and risk management on Modern Slavery.

4 SUBMISSION AND PUBLISHING

- The Executive Chair and the Board of Directors at Wiluna Mining approved this Statement on 1 December 2020.
- The Statement is provided to Australian Border Force.
- Wiluna Mining publishes related documents on its website.



Milan Jerkovic

EXECUTIVE CHAIR

Wiluna Mining Corporation Limited

10 December 2020