



MODERN
SLAVERY
STATEMENT
FY2020

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Our values



We act with honesty and integrity



We treat people with respect



We value working together



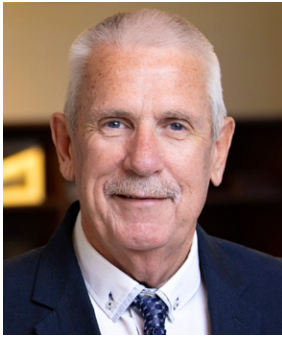
We deliver on promise



We strive to do better

We deeply respect and value the traditional owners of the lands on which we operate. In the communities surrounding our operations in Australia, Canada and Papua New Guinea, we make it a priority to learn about the cultures that shape their First Nations' people.

INTRODUCTION



This Modern Slavery Statement (Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) by St Barbara Limited, for the financial year ended 30 June 2020 (FY20).

St Barbara¹ is committed to eliminating modern slavery practices within our global operations and supply chains. We recognise that slavery, in its many forms, continues to permeate the supply chains of global entities. Everyone has a role to play in combatting modern slavery and we, as a gold mining group, have developed processes and procedures to better understand our areas of impact and influence so as to address, mitigate and remediate instances of modern slavery.

Our approach to addressing modern slavery risks is guided by our five Company Values of acting with honesty and integrity, treating people with respect, working together, delivering on promises and striving to do better. Our strong, values-led culture drives our behaviour and guides our decision-making every day as we deliver on our commitments. These commitments to safety always, empowered people diverse teams, stronger communities, respecting the environment and growing sustainably are a demonstration of our values-led culture.

We are committed to eliminating any and all forms of modern slavery practices within our global operations and supply chain. At St Barbara, doing the right thing is important to all of us.

This is our first Modern Slavery Statement. During our first reporting period, we have reflected on where we can do better and have sought to implement meaningful changes by first seeking to assess the modern slavery risks in our operations and supply chains. In doing so, we recognise the ongoing work ahead of us as we seek continuous improvement year on year.

The impact of COVID-19 in FY20 has resulted in significant challenges. First and foremost, our focus has been on the safety, health and wellbeing of our employees and their families, our business partners and our communities during this pandemic. It is without doubt that many of our suppliers have also grappled with the challenges resulting from COVID-19.

This statement has been approved by St Barbara Limited's Board of Directors on 16 February 2021.

Craig Jetson
Managing Director and CEO
16 February 2021

Our commitments



SAFETY ALWAYS

Zero harm is always our target. Zero harm to all people as we responsibly operate our assets to their full potential. This focus on safety guides everything we do.



EMPOWERED PEOPLE DIVERSE TEAMS

We are an employer of choice committed to inclusion and diversity. We provide a caring work environment where our talented people are happy, thrive, feel safe and can fulfil their potential.



STRONGER COMMUNITIES

We strive to help our communities thrive, grow and prosper. We build meaningful relationships, investing time and energy to ensure local communities are enriched by being our neighbours.



RESPECTING THE ENVIRONMENT

We are committed to caring for the environment. We think differently to find solutions to actively manage and neutralise our impact; because we care about the environment and our planet.



GROWING SUSTAINABLY

Growing our business sustainably, where it makes sense, and with strong governance practices, means we can add value for everyone: our shareholders, our people and our communities.

1. In this Statement, the terms 'St Barbara', the 'Company', the 'Group', our 'business', 'organisation', 'we', 'us', 'our', and 'ourselves' refer to St Barbara Limited and, except where the context otherwise requires, its wholly owned subsidiaries as set out in the next section of this Statement and any other entities owned or controlled by St Barbara.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

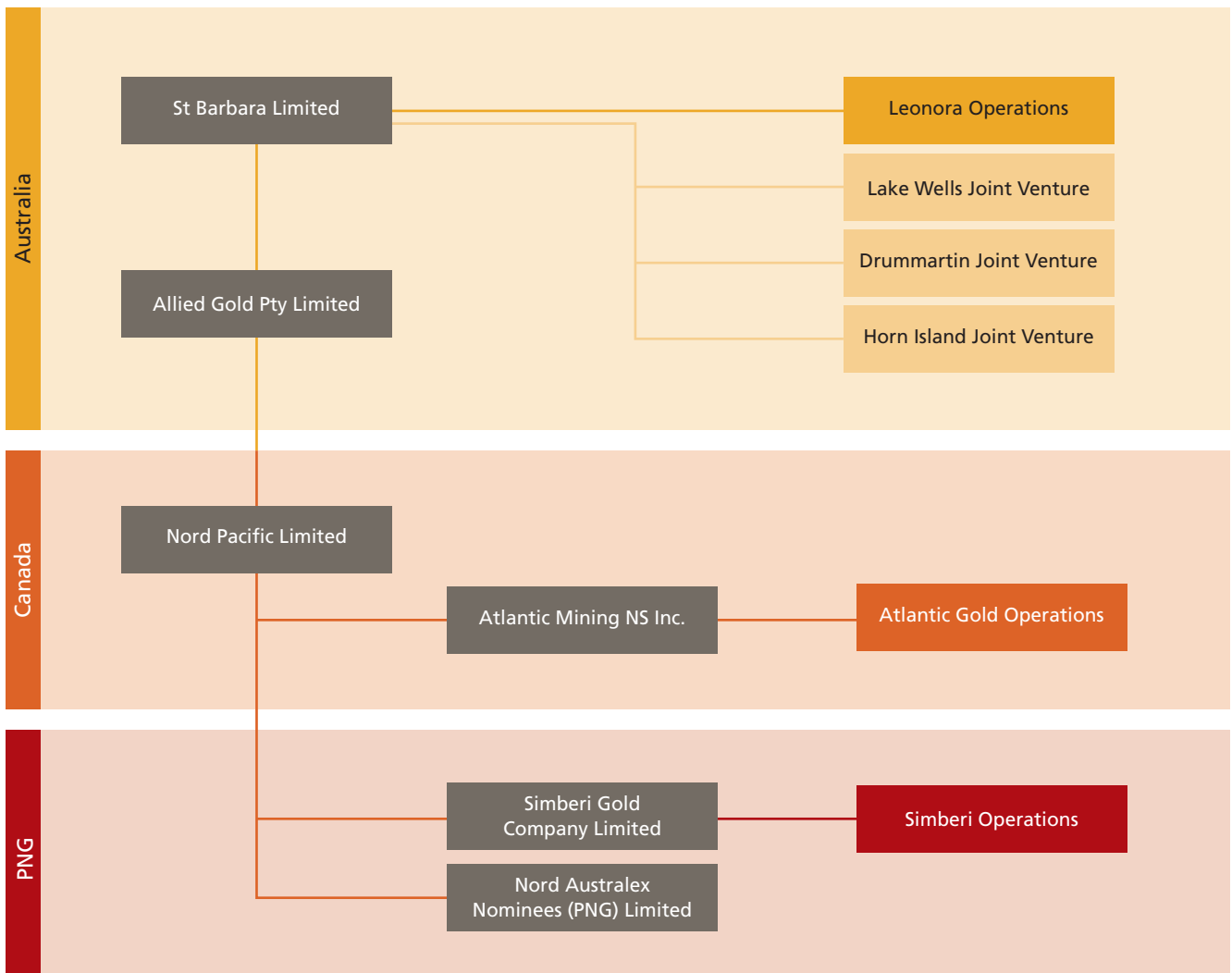
St Barbara is a growing gold mining group with a global outlook. We have gold mining operations located in Australia, Canada and Papua New Guinea. The St Barbara group comprises six corporate entities with over 1300 employees.

Our structure

St Barbara Limited (ACN 009 165 066) is a publicly listed company on the Australian Securities Exchange (ASX) and is headquartered in Melbourne, Victoria with an office in Perth, Western Australia and a warehouse in Lytton, Queensland.

As illustrated in the diagram below, as at 30 June 2020, St Barbara Limited was the ultimate holding company of the following wholly-owned subsidiaries across Australia, Canada and Papua New Guinea:

- Allied Gold Pty Limited, non-operating company registered in Australia.
- Atlantic Mining NS Inc. (trading as Atlantic Gold), operating company registered in Nova Scotia, Canada.
- Nord Australex Nominees (PNG) Limited, non-operating company registered in Papua New Guinea.
- Nord Pacific Limited, non-operating company registered in New Brunswick, Canada.
- Simberi Gold Company Limited, operating company registered in Papua New Guinea.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CONTINUED

Our operations

St Barbara's operations include three operating gold mines, exploration activities, rights to acquire interests in operated and non-operated joint ventures, and equity investments.

We own and operate the following three gold mining operations:

- Atlantic Gold Operations, which includes the Touquoy open pit mine and three additional planned pits nearby at Beaver Dam, Cochrane Hill and Fifteen Mile Stream.¹ These operations are located approximately 80km north east of Halifax, Nova Scotia in Canada.
- Leonora Operations, which includes the Gwalia 1.2 Mtpa processing plant and the Gwalia underground mine. The Gwalia underground mine is located 235km from Kalgoorlie, Western Australia.
- Simberi Operations, which is an open cut mine situated on the northernmost island in the Tabar group of islands in the province of New Ireland – the eastern most province of Papua New Guinea and approximately 1,000km north of Port Moresby.

St Barbara also conducts exploration activities globally, with exploration teams based at the Gwalia mine (Western Australia), Touquoy mine (Canada), Simberi mine (PNG) and Perth for regional projects in Australia. These regional projects include Pinjin and Lake Wells (Western Australia), Back Creek (New South Wales), Drummartin (Victoria) and Horn Island (Queensland).

St Barbara has a right to acquire an interest in the following operated and non-operated exploration joint ventures:

- *Drummartin Joint Venture* – St Barbara entered into an Earn-in and Joint Venture Agreement with Catalyst Metals Limited and Kite Operations Pty Ltd dated 23 November 2019 in respect of the Drummartin Project located approximately 60km north of the Fosterville Gold Mine in Fosterville, Victoria. Under this agreement, St Barbara has a right to acquire a 50% participating interest. As at 30 June 2020, St Barbara has not exercised its right to acquire its participating interest and does not manage nor have operational control of this joint venture.
- *Horn Island Joint Venture* – St Barbara entered into an Earn-in and Joint Venture Agreement with Alice Queen Limited and Kauraru Gold Pty Ltd on 4 June 2019 in respect of the Horn Island Project located on Horn Island in far-north Queensland. Under this agreement, St Barbara has the right to acquire a 70% participating interest. St Barbara has been appointed as manager of this joint venture during the earn-in period. As at 30 June 2020, St Barbara has not exercised its right to acquire its participating interest.
- *Lake Wells Joint Venture* – St Barbara entered into an Earn-in and Joint Venture Agreement with Australian Potash Limited on 8 October 2018 in respect of the Lake Wells Project located approximately 150km north-east of Laverton, Western Australia. Under this agreement, St Barbara has a right to acquire a 70% participating interest. St Barbara has been appointed as manager of this joint venture during the earn-in period. As at 30 June 2020, St Barbara has not exercised its right to acquire its participating interest.

St Barbara also has minority equity investments in the following companies listed on the ASX:

- Catalyst Metals Limited (CYL)
- Duketon Mining Limited (DKM)
- Peel Mining Limited (PEX)

1. As at 30 June 2020, Atlantic Gold Mining Inc. held a 60% interest in the Touquoy open pit mine. As at the date of this statement, Atlantic Gold Mining Inc. holds a 100% interest.

Snapshot of our workforce

As at 30 June 2020, our workforce comprised of 1325 employees as well as supporting contractor personnel. The employee breakdown for each country that we operate in is as follows:

St Barbara Group Employees – FY20

Australia	261
Papua New Guinea	746
Canada	318

Community engagement

Community engagement is an important part of each of our operations.

Leonora (Western Australia)

We lead and participate in a number of community engagement projects in the Leonora community, with a particular focus on local schools, education, youth sports, mentoring programs and workshops aimed to inspire local youths and various local sponsorship programs.

Nova Scotia (Canada)

Atlantic Gold is proud of its program of community sponsorships, charitable contributions and support of community and First Nations aspirations. Atlantic Gold is active in the local school community of Middle Musquodoboit Rural High School and provides internships for students with First Nations backgrounds.

Simberi Island (PNG)

The Simberi operations has a significant PNG national workforce with 57% of the workforce based on the island of Simberi and surrounding local islands as well as a further 38% being other PNG nationals.

Under the umbrella of Simberi Mine Services Ltd, which is a community business coordination and governance company for the people of Simberi Island and the Tabar Group of Islands, we empower the local community by providing them with access to training and helping them to develop commercial ventures, such as mariculture inland fisheries and cocoa plantations.

Our Simberi community team is supported by the Community Relationship Office (CRO), which comprises 22 employees, including a project team constantly engaged in community and environment orientated civil works. We perform many civil-type functions, provide infrastructure and otherwise support health and education in the community.

Our Grievance Resolution Framework provides a mechanism for receiving and addressing stakeholder concerns and also provides the CRO at the Simberi operations a proactive tool for issue analysis, reporting and self-assessment.

Simberi Island enjoys a high standard of living, as compared to other parts of Papua New Guinea, due to our mining operations. Per capita annual income is approximately US\$1,200, a level that less than 35% of Papua New Guineans enjoy. Housing, schooling and health care are all well above average Papua New Guinea levels. 43% of males and 14% of females living on Simberi Island are employed at our mine or in mine related services associated with our mine.

In late 2019, the Group's mining lease at the Simberi Operations was extended for 10 years, which reflects government and community support for the operation.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

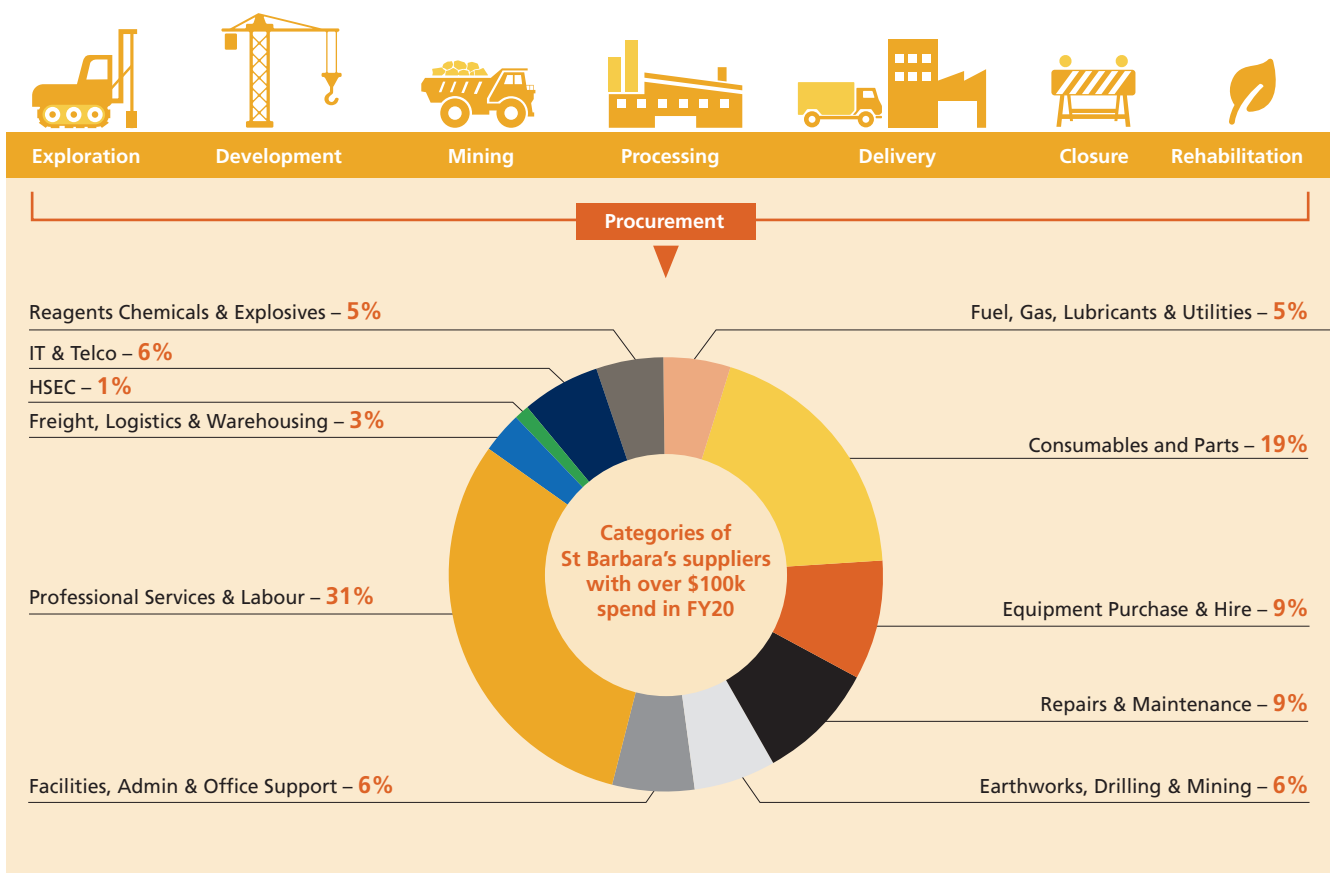
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Our supply chains

Our value chain and supply chain process is broadly described as follows: exploration, development, mining, processing, delivery to the mint and closure and rehabilitation.

Our procurement function is responsible for purchasing goods and services for our business, providing commercial governance and managing our supply chain risks.

A breakdown of our global FY20 material procurement supplier engagements, based on category, is set out in the diagram below:



Our suppliers provide goods and services from around the globe. The results of our supplier questionnaire (discussed in further detail in this Statement), which was issued to approximately 580 of our suppliers, representing approximately 66% of our overall spend, showed suppliers were domiciled predominately in Australia, Papua New Guinea and Canada, reflecting the utilisation of local suppliers at our sites wherever possible.

We recognise that a number of our suppliers supply goods that are either grown or manufactured in locations other than where those suppliers are domiciled. These countries include China, Germany, Italy, Japan and the United States. We endeavour to build our capability to analyse the second tier of our supply chain.

Impact of COVID-19

The COVID-19 global pandemic presents significant health, economic and social challenges. Guided by our COVID-19 Management Framework and Protocols, we are working to keep our people, our partners and our communities safe and well.

Further information regarding how we are addressing COVID-19 related issues is set out in our 2020 Sustainability Report.

RISKS OF MODERN SLAVERY

While St Barbara is not aware of any modern slavery in its operations and supply chains, St Barbara recognises that there may be a risk of modern slavery practices in its operations and supply chains.

Our operations

This section addresses the risks of modern slavery practices in our operations and the location specific processes in place to assess and address those risks.

We consider that our operational modern slavery risk is low in respect of our Australian and Canadian sites. Our employees in those locations range from mining engineers, geologists, technicians, plant operators, truck drivers, accountants, administrators and other professionals. Australia and Canada are ranked 163 and 166 respectively out of 167 countries for modern slavery prevalence by the Global Slavery Index. As a result of the

low jurisdiction risk combined with our recruitment and remuneration programs, we consider that there is low risk of modern slavery practises in our Australian and Canadian operations.

The risk of modern slavery is inherently higher in our Simberi operations due to the combination of the country risk profile and the risk profile attributed to the mining sector generally. For this reason, in our first year of reporting, we have focused on assessing the modern slavery risk arising from our operations in Papua New Guinea.



Leonora Operations, Western Australia

RISKS OF MODERN SLAVERY

CONTINUED

Child Labour

- Verifying the age of locals on Simberi Island has proven challenging due to the fact that birth certificates are almost non-existent. National ID Cards (NID) are challenging for locals to obtain and the majority of locals do not have driver's licences as they do not have vehicles. Some have school certificates which can provide some indication as to the age of the individual, however, the certificates are not considered reliable in terms of validating age.
- National FIFO employees from other parts of Papua New Guinea are most likely to have a birth certificate, NID, passport (in some cases) or high school completion certificates. It should be noted that high school completion certificates may not be indicative of age as the years of schooling may be protracted depending on individual circumstances.
- The contracting companies on Simberi Island that source workers for our Simberi operations utilise visual checks to confirm working age, relying on physical attributes such as the presence of facial hair for males and specific physique features (body development) for females. The workers sourced via these contracting companies are then required to undergo our own checks, as explained below.
- Similarly, St Barbara's onsite Human Resources team use visual checks when new employees and contractors come in for employee photo ID. Employees are required to fill in the new starter form which requires a date of birth. We cross-check this information against the visual checks as a means of verifying age. Some locals have provided us with their "Clinic Book" which is the book mothers are given when children are born on the island. We are exploring this as an option for age verification as part of our action plan to address risks.
- Based on our records, there is no one working on our mine site on Simberi Island under the age of 18 years. We remain vigilant on the risk of child labour and other forms of modern slavery that may form part of our Simberi operations and we continue to improve on our ability to detect red flags.

Wages

- To assess the human rights impacts in respect of the wages paid to workers on Simberi Island, we reviewed the wages paid to the worker categories that were the lowest paid. We identified that assistants in our camps that undertake general cleaning duties in the mess and accommodation rooms and entry level roles in Geology and Environment were the lowest paid workers.
- There is no set living wage in Papua New Guinea. The only form of set wage is the national minimum wage, which was created by the Minimum Wages Board of Papua New Guinea in 2014.
- The national minimum wage in Papua New Guinea is K3.50 per hour. From our review:
 - the lowest hourly rate that we have paid for those with no relevant experience is K3.60 per hour; and
 - the lowest annualised salary is K11,500 per annum plus superannuation for entry level positions and some assistant roles in Geology and Environment.
- We also participate in the Korn Ferry Salary Survey in March each year together with 12 other mining companies in Papua New Guinea. Simberi Gold Company Limited has participated in this survey for over seven years. Each role at our Simberi operations has a job level and we provide all employee salaries at each job level and in each specialist area (e.g. Maintenance,

Human Resources, Finance etc.). This results in average data of the 12 companies for low, average and high remuneration bands for each job level. Once this data is released, we update our Remuneration Benchmarking document which we use for all promotions, appointments of new employees, and through the salary increase and progression processes. This ensures fair, transparent and current remunerations based on experience and qualifications for a role.

- In light of the above, we are satisfied that our workers on Simberi Island are paid in excess of the national minimum wage for Papua New Guinea.

Living and Working Conditions

- We provide camp accommodation and meals on Simberi Island for use by those workers that fly into the island from other provinces of Papua New Guinea for the purposes of work. This accommodation varies from single rooms with ensuite for more senior staff (Superintendent and above), to share rooms (with up to 3 employees in a room). The camp is maintained and cleaned daily by maintenance and cleaning personnel who are our direct employees.
- All of our employees receive appropriate Personal Protective Equipment including shirts, pants, work boots, hardhats and glasses, if required. As part of our response to the COVID-19 pandemic, we donated 1,000 test kits to the provincial health authorities and assisted locals with monitoring boats moving between other islands, with employees and contractors of the Simberi Operations taking temperatures and completing questionnaires to protect the health and safety of our workers and the broader community.
- St Barbara plays a significant role in improving the living standards year on year for the locals living and working on Simberi Island. St Barbara performs many civil-type functions, providing infrastructure and otherwise supporting health, law and order and education in the community. Our 2020 Sustainability Report sets out our recent community initiatives.
- We are proud of the role we have played and continue to play in improving the living standards of the residents on Simberi Island as well as providing quality accommodation for our workers onsite with access to three meals per day.

Audits

- St Barbara conducts regular audits across a number of areas including finance, payroll, human resources, health, safety, and environment and community. Some of our audits are conducted by third parties. Management and Directors travel to our mine sites and do 'walk arounds'.
- One of our audits is the Gender Safety Audit with Papua New Guinea's Business Coalition for Women. These audits have been regularly conducted at our Simberi operations since 2016. They are a valuable tool in creating a safe and inclusive workplace for our people.
- St Barbara also conducts regular gender pay audits and has a nil gender pay gap for like-for-like roles. Our target is to reduce 'overall gender pay gap' to 8% by 2022.

RISKS OF MODERN SLAVERY

CONTINUED

Our supply chains

The section sets out the risks of modern slavery in our supply chain and the due diligence we have undertaken to assess and address those risks.

We recognise that every supply chain carries the risk of causing, contributing or being directly linked to modern slavery. Given our industry sector, we are cognisant of the fact that the risks are inherently higher, particularly in Papua New Guinea where the Global Slavery Index estimates that 81,000 people live in modern slavery. Having regard to the heightened risks we have, we continue to evaluate our supply chain for modern slavery impacts.

In this first reporting year, we reviewed our procurement spend across each of our locations and prepared a revised list of direct tier 1 suppliers based on an annualised spend of A\$25,000+ in FY20 (**Due Diligence List**). This Due Diligence List comprising approximately 580 suppliers became our focal point for our supply chain review for modern slavery risk.

The UN's Guiding Principles on Business and Human Rights (**Guiding Principles**) articulates best practice in respect of human rights due diligence (which encompasses modern slavery). It includes four stages:

- Impact assessment
- Integration
- Tracking
- Communication

We recognised the need for an informed and structured impact assessment in order to determine our supply chain priorities and respond appropriately. The Guiding Principles recognises that prioritisation of risk is often essential for companies with extensive supply chains. We determined that an online questionnaire-based approach was the most appropriate means by which to undertake our impact assessment.

The suppliers on the Due Diligence List were issued a modern slavery questionnaire (**MSQ**) which was sent out via a third party SAP cloud-based platform. The MSQ was designed with five key risk areas in mind:

- Jurisdiction/country of origin risk
- Industry/product risk
- Utilisation of vulnerable workers
- Prior human rights impact assessment
- Implementation of policies, procedures and systems

The MSQ features automated analytics that generates a modern slavery risk rating for each supplier based on responses to the weighted questions. The datasets underpinning the analytics are driven by global indices on modern slavery and human rights risks.

Approximately 50% of the suppliers on the Due Diligence List completed the MSQ. The completion rate was likely to be impacted by the absence of modern slavery legislation in Canada and Papua New Guinea, the lack of familiarity/awareness amongst our suppliers of the concept of 'modern slavery' and the impact of COVID-19. We anticipate that the completion rate will improve year on year.

Almost 70% of the suppliers who responded to the questionnaire received a low risk rating. The bulk of the suppliers in the low risk category were in the professional services industry in low risk jurisdictions such as Australia and Canada, both of which have lower modern slavery risk profiles. This result was as anticipated.

We took a closer look at the suppliers who were given a risk rating of medium and high based on the combination of jurisdiction and industry risks. Of this cohort, we identified construction as our area of greatest risk. The prevalence of low-skilled/low paid workers, combined with often complex and geographically diverse supply chains makes the construction sector one of the most susceptible to modern slavery, irrespective of whether the construction activity takes place in a low risk country such as Australia or Canada.

While no modern slavery was identified through the MSQ process, we identified six suppliers requiring further discussions in order to scrutinise their risk profiles in greater detail. Three companies in Papua New Guinea from the construction sector were included in this list, as well as a company providing food and accommodation services in Papua New Guinea. The latter was selected on the basis of the MSQ revealing the utilisation of workers under the age of 18 years. We considered this response as a red flag given the heightened risks of child labour in Papua New Guinea.

We are committed to working with our suppliers to promptly address issues so as to prevent and remedy any actual impacts.

ACTIONS TO ASSESS AND ADDRESS RISKS

We undertook a number of key initiatives this reporting period to identify, assess and address modern slavery risk in our global operations and supply chains. These included:

- ✓ Developing and implementing a Modern Slavery Policy
- ✓ Introducing a Supplier Code of Conduct
- ✓ Adding modern slavery clauses to our standard terms and conditions
- ✓ Undertaking a modern slavery gap risk analysis of our policies and procedures
- ✓ Updating relevant policies and procedures with modern slavery related provisions
- ✓ Providing modern slavery training
- ✓ Undertaking a modern slavery due diligence of our suppliers and investment targets

Modern Slavery Policy

The Modern Slavery Policy outlines our commitment to eliminate modern slavery within our global operations and supply chains. These commitments include:

In relation to St Barbara's operations:

- ensure that all of St Barbara's employees work for St Barbara voluntarily and are able to provide evidence that they are older than the minimum working age in the jurisdiction in which they work
- ensure that all of St Barbara's employees are paid no less than the minimum wage in the jurisdiction in which they work
- train St Barbara staff in relation to how to identify indicators of modern slavery
- annually assess St Barbara's operations for modern slavery risk

In relation to St Barbara's supply chain:

- wherever possible, require St Barbara's suppliers to agree to comply with the St Barbara Supplier Code of Conduct and the Modern Slavery Policy and otherwise seek to engage suppliers who uphold St Barbara's commitment to eliminating modern slavery practices
- undertake regular due diligence on St Barbara's supply chain to identify and address any actual or potential risks of modern slavery
- work with St Barbara's suppliers to assist them to identify and manage the risk of modern slavery within their operations and supply chain
- make the St Barbara Whistleblower program available to St Barbara's suppliers

The Modern Slavery Policy supplements St Barbara's Code of Conduct and Supplier Code of Conduct, and is publicly available on our website at stbarbara.com.au/about-us/governance/

The Modern Slavery Policy forms part of our integrated suite of governance policies that together form our Code of Conduct.

ACTIONS TO ASSESS AND ADDRESS RISKS

CONTINUED

Supplier Code of Conduct

The Supplier Code of Conduct sets out our business principles, based on Our Values. These business principles relate to:

- Modern slavery
- Anti-bribery and corruption
- Diversity and inclusion
- Health and safety
- Sustainability

We are committed to engaging with only those suppliers whose principles match our own. Our suppliers are required to comply with all applicable laws and, in all cases, to meet the standards and principles set out in our Supplier Code of Conduct across all areas of their business.

The Supplier Code of Conduct requires our suppliers to comply with applicable modern slavery laws and expressly prohibits any forms of human trafficking, slavery, servitude, forced labour, forced marriage, deceptive recruiting for labour and services, debt bondage and child labour. We make it clear in our Supplier Code of Conduct that we reserve our right to undertake due diligence and risk assessments to verify supplier compliance. These verification rights are supported by our standard contract terms and conditions.

We expect all of our suppliers to comply with the Supplier Code of Conduct. The Supplier Code of Conduct is publicly available on our website at stbarbara.com.au/contact/suppliers/

Our policies and procedures

We updated a number of our policies and procedures after undertaking a modern slavery gap analysis. This included updates to our Procurement Policy, Whistleblower Policy and Human Resources Recruitment Guidelines.

The Whistleblower Policy forms part of our Grievance Resolution Framework. The Whistleblower Policy provides a mechanism whereby St Barbara employees, suppliers and others can report their concerns of actual or suspected misconduct, including modern slavery related breaches without the fear of reprisal or intimidation. All of our employees, contractors, consultants and suppliers have access to St Barbara's whistleblower system. Our whistleblower reporting service is managed by an external independent provider, where reports may be submitted by phone, on-line or by mail. In addition to this service, our employees may also report to their manager or designated Whistleblower Protection Officer.

No complaints related to modern slavery were reported via our whistleblower system in FY20.

Further information regarding the whistleblower and investigation process is set out in the Whistleblower Policy, publicly available on our website at stbarbara.com.au/about-us/governance/

Modern slavery training

We have a strong focus in educating and training our people. Modern slavery focussed training was provided to all Procurement and Human Resources personnel, across all sites, as well as to all St Barbara managers (across all functions) and the St Barbara executive leadership team.

We will progressively provide modern slavery training to the majority of our people, across all sites, through e-learning training.

Engaging suppliers – on-boarding

We understand the importance of early detection of modern slavery risk in our supply chains. Consequently, as part of the supplier on-boarding process, we have sought to undertake a modern slavery risk assessment for all new suppliers to our business with an annualised spend of greater than A\$25,000.

We have also updated our procurement tender process by introducing modern slavery related considerations in our tender assessment criteria.

It is our policy not to engage with third parties where the minimum national and/or international legally required labour standards are not adhered to or where we believe, following a modern slavery risk assessment, that the third party or its suppliers engage in modern slavery (**Minimum Standards**). We will not enter into or renew any contract with a third party whose risk of modern slavery is assessed as high without evidence that the third party has in place adequate controls to manage the risk of modern slavery.

More broadly, where the Minimum Standards have otherwise not been met, we will work with the supplier to help achieve, at the very least, the Minimum Standards prior to entering into any contractual arrangement. If the Minimum Standards are not met within a reasonable period, it is our policy to not engage with the supplier or terminate the existing engagement, as relevant, regardless of any short-term disruption to the supply chain.

Engaging suppliers – contracting

Where possible, we engage suppliers under our standard terms and conditions. These terms and conditions require our suppliers to meet a number of minimum standards, including with respect to:

- health and safety;
- environment;
- anti-bribery and anti-corruption; and
- modern slavery.

We expect our suppliers to meet these minimum standards. Where possible, we will endeavour to address modern slavery in all future supplier engagements.

ACTIONS TO ASSESS AND ADDRESS RISKS

CONTINUED

Review of St Barbara's joint ventures

We recognise that modern slavery may exist in the joint ventures we are associated with. Where we operate or manage a joint venture, then we will monitor and report on any modern slavery risk in that joint venture operation as part of St Barbara's operation. This is the approach we have taken with the Lake Wells Joint Venture and the Horn Island Joint Venture.

Where we do not operate or manage the joint venture, we will assess modern slavery risk at a broader level. This includes requesting annually from the operator of the joint venture, the processes and procedures that the joint venture has in place to address modern slavery risk in its operations and supply chains. If we become aware of any material modern slavery risk in the joint venture, we will endeavour to address such risk with the operator of the joint venture. This is the approach we have taken with the Drummartin Joint Venture.

As a minority shareholder of Catalyst Metals Ltd, St Barbara sent a request for information with respect to all of Catalyst's operations, which includes the Drummartin Joint Venture. Catalyst's response supports the opinion that there is a low risk of modern slavery practices associated with Catalysts' operations, including the Drummartin Joint Venture.

We will continue to engage in dialogue with Catalyst and our joint venture partners and seek ways to work collaboratively to increase awareness of modern slavery risks in the extractives industry.

Review of St Barbara's equity investments

We recognise that modern slavery may exist in the companies we invest in. We have introduced modern slavery considerations when assessing any investment opportunity.

Where we invest in a company we do not control, we will assess modern slavery risk at a broader level. This includes requesting annually from the company, the processes and procedures that the company has in place to address modern slavery risk in its operations and supply chains. If St Barbara becomes aware of any material modern slavery risk in the company, it will endeavour to address such risk with the company. This is the approach St Barbara has taken with its investments in Catalyst Metals Limited, Duketon Mining Limited and Peel Mining Limited.



Simberi Operations, Papua New Guinea

MEASURING EFFECTIVENESS

The evaluation of effectiveness is vital to ensuring that we are on the right track and effecting meaningful change.

Going forward into FY21, we will:

- aim to improve the due diligence completion rate of second year MSQ responses to at least 60%;
- endeavour to share our Modern Slavery Statement with a cover note in the lead up to the issuing of MSQs for our second year of supply chain due diligence as a way of communicating the importance we place on addressing modern slavery risks in our business and supply chain;
- commence a deep dive in relation to the supply chain of construction in PNG with a view to increasing our understanding beyond tier 1 and making an informed decision in relation to the suppliers we use for the provision of construction in PNG;

- endeavour to roll out modern slavery training to the majority of our people, across all sites, through e-learning training;
- work closely with the CRO at the Simberi operations to create a communication plan to raise awareness of modern slavery within the workforce on the island; and
- commence the MSQ process with the contracting companies who source workers for St Barbara on Simberi Island.

In our first year of reporting under the *Modern Slavery Act 2018* (Cth), our focus has been to set up processes and procedures to address the risk of modern slavery practices in our operations and supply chains. Assessing the effectiveness of the actions we have taken to assess and address these modern slavery risks is something that we endeavour to further develop and continuously improve.

One example, is our capability to monitor the modern slavery risk profile of our suppliers through the online automated MSQ process. The functionality of the MSQ process allows us to track our supplier's modern slavery risk profile each time it responds to the MSQ. Over time, this process will assist us in determining whether any actions we are taking with "higher risk" suppliers is effective in reducing such risk.

CONSULTATION WITH THE GROUP

The St Barbara Board is responsible for the oversight of all sustainability issues in the St Barbara Group, with the Board's Audit and Risk Committee responsible for ensuring the proper management of human rights-related risks, including modern slavery.

St Barbara has a centralised management function as follows:

- the procurement function of all locations ultimately report to St Barbara's General Manager Finance and Procurement;
- the human resources function for all locations reports to St Barbara's Executive General Manager People;
- the majority of policies and procedures (including the Modern Slavery Policy and Procurement Policy) are applicable to all of our operations;
- contract templates have been updated to include modern slavery clauses for all of our operations; and
- modern slavery training was provided to the General Managers, Managers, Human Resources and Procurement personnel of all of our operations.

The Health, Safety, Environment and Community Committee has responsibility in ensuring modern slavery practises are identified and addressed in our operations.

The MSQ process was a joint effort across our locations in FY20, with Site General Manager support. The procurement team worked collaboratively to formulate the Due Diligence List comprising suppliers from Australia, Canada and Papua New Guinea.

Preparation of this Statement has involved input from numerous parts of the St Barbara Group, including Human Resources, Procurement and Legal. The St Barbara Executive Leadership Team has also reviewed this Statement before being submitted for Board approval.

On 5 February 2020, a Bill to enact a Modern Slavery Act was introduced in the Canadian Senate. However, the onset of COVID-19 in March resulted in delays to the progression of the Bill. We will continue to monitor the progress of the Bill and work with our personnel in Canada to share learnings and insights.

OTHER INFORMATION

2020 Sustainability Report

Our annual Sustainability Report details our Environmental, Social and Governance commitments and activities from FY20. We have extracted the information relevant to our Modern Slavery Statement below. The Sustainability Report is publicly available on our website at <https://stbarbara.com.au/sustainability/>

St Barbara uses the Global Reporting Initiative (GRI) standards to guide our sustainability disclosures. An extract of relevant GRIs from our 2020 Sustainability Report is shown below:

GRI Ref ¹	GRI Core met ²	Item	Discussion	UNGC ³
408	–	Child Labour	Children are forbidden from entering (as well as working in) the Group's operations. The Group holds that this area is immaterial because the assessed risk of incidence is low.	5
409	–	Forced or Compulsory Labour	The Group holds that this area is immaterial, as the assessed risk of related issues is low.	4
410	–	Security Practices	The Group holds that this area is immaterial, as the assessed risk of related issues is low.	2
411	–	Rights of Indigenous Peoples	This area is considered immaterial. The Group has extensive procedures in place to ensure the rights of Indigenous peoples are not violated and has had no significant incidents during the reporting period.	2
		Mining and Metals supplement	<i>MM5 Operations adjacent to indigenous people's territories.</i> This area is considered immaterial for the same reasons as stated in 411 above. In Simberi PNG the local community is a party to a 'Memorandum of Agreement' along with different layers of government and the Group, in line with mining regulation.	2
412	–	Human Rights Assessment	The long-term history of democratic liberal constitutional government in Australia, Papua New Guinea and Canada make these important issues of low materiality to the Group, in the sense that the assessed risk of related issues is low.	1,2
		Mining and Metals supplement	The <i>Human Rights</i> areas in the Mining and Metals supplement G4 DMA and MM5 are excluded also for the same reasons.	1,2
413	–	Local Communities	In Leonora, Western Australia, 'fly-in, fly-out' and centralised procurement functions, have reduced the economic relevance of the local community to the mine. In Papua New Guinea mining regulation mandates a high level of involvement. As a result, 1-2% of total costs of the Simberi mine are related to Community support functions, ~45% of the workforce lives locally, and 6% of total costs are spent with local suppliers and contractors. The Group reports on its employment of local community members, its contracting with local community companies and its grievance/complaint function in this report. In Touquoy, Canada, nearly all employees live locally. As a newly acquired operation the Company is reviewing all procurement arrangements with engagement of local businesses an important consideration.	1,2,3,6

OTHER INFORMATION

CONTINUED

United Nations Sustainable Development Goals (UNSDGs)

As part of our membership of the UN Global Compact, we support the UNSDGs. We have mapped our impacts against the most relevant Goals:

UNSDG (only most relevant goals)	Contribution	UNSDG (only most relevant goals)	Contribution
 1 NO POVERTY	No poverty We contribute through the employment of people at high relative wages in: <ul style="list-style-type: none"> • a developing country, PNG • a rural location in Nova Scotia, Canada, with relatively low employment rates, wages and opportunities. We pay our taxes, contribute to charities and, in PNG and Canada, engage local businesses.	 8 DECENT WORK AND ECONOMIC GROWTH	Industry, innovation and infrastructure In our Gwalia mine in Western Australia, we have pioneered new developments in underground mining. At Simberi in PNG, we build and maintain roads and water infrastructure of our local communities. In Nova Scotia, Canada, we are trialling scalable salt-water batteries that will be the basis of our drive for carbon neutrality.
 2 ZERO HUNGER	Zero hunger We provided seed money and set up viable businesses, and provide ongoing financial support and advice for local farmers in PNG who sell food to our mine and into the local economy.	 13 CLIMATE ACTION	Climate action We are amongst the most carbon efficient gold mining companies in the world, and this year have announced long-term targets to improve this efficiency further in line with Paris 2015 goals and achieve carbon neutrality by 2050.
 3 GOOD HEALTH AND WELL-BEING	Good health and well-being We aim for zero harm to our employees, with an injury rate well below Australian benchmarks, and strong improvement in our safety metrics year on year. In PNG, we provide free vaccinations to the community at our clinic, and where necessary roll out emergency vaccination programs. We also fund anti-malaria non-governmental organisations (NGOs) in PNG. In Australia and Canada, we provide free flu vaccinations. In all three countries, we offer free mental health services to all employees, with special measures taken during the COVID-19 pandemic.	 15 LIFE ON LAND	Life on land We undertake rehabilitation of disturbed land and management of waste and effluent according to best practices and regulatory requirements as well as provide offsets for unavoidable land and water harm to a higher standard of biodiversity. We prepare for closure in accordance with strict government requirements for forward financial provisioning.
 4 QUALITY EDUCATION	Quality education In PNG, we support primary schools in the community and adult education for our employees and employees of contractors. This has included building houses for teachers, and donations of stationary, books and desks. In Western Australia, we support educational related sports foundations that encourage Indigenous children in remote locations to attend school such as 'Shooting Stars' for girls and the 'Clontarf Foundation' for boys.	 16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Peace, justice and strong institutions We have been a financial support of the EITI for three years and publish government taxation related information in our Sustainability Report. All political donations are prohibited under our governance policies. We have published our first modern slavery and human rights ('Community Relations') policies this year, as well as a comprehensive supply chain code of conduct.
 5 GENDER EQUALITY	Gender equality We are a global mining industry leader for gender equality, winning numerous awards for promoting and achieving high levels of women's employment, gender safety at work, domestic violence prevention and strong post parental leave return-to-work initiatives.	Domestic Violence Domestic violence has been recognised as a human rights issue by the UN Committee on the Elimination of Discrimination against Women. We have put in place a number of processes to support our workers who are dealing with domestic violence in each of our locations, including a new policy framework, guidelines and training for key staff in first response to domestic violence situations. We seek to support our employees through: <ul style="list-style-type: none"> • paid leave provisions • free confidential specialist counselling • personal safety arrangements • short term financial assistance • flexible working arrangements At the Simberi PNG mine, we pioneered a gender safety program, recognising the different safety concerns of women, in partnership with the PNG 'Business Coalition for Women'. A non-violence initiative for men, the 'Warrior' program, has been running for male employees since 2015, and since 2018, for contractors and community members also. The program is delivered in Tok Pisin, the local language.	
 6 CLEAN WATER AND SANITATION	Clean water and sanitation None of our mines is in competition with domestic and agriculture water users. All three mines utilise recycling to minimise water use and costs. Our Gwalia mine in Western Australia has twice received government 'Waterwise' awards for reductions in water use.		
 7 AFFORDABLE AND CLEAN ENERGY	Decent work and economic growth We have kept our mines fully operational and workforce employed during the COVID-19 pandemic, and have growth projects at all three mines in the construction, planning or permitting stages. All employees and contractors are treated with respect and protected by a range of workplace policies. Our Papua New Guinea and Canada mines provide jobs at above average wages in those regions.		

