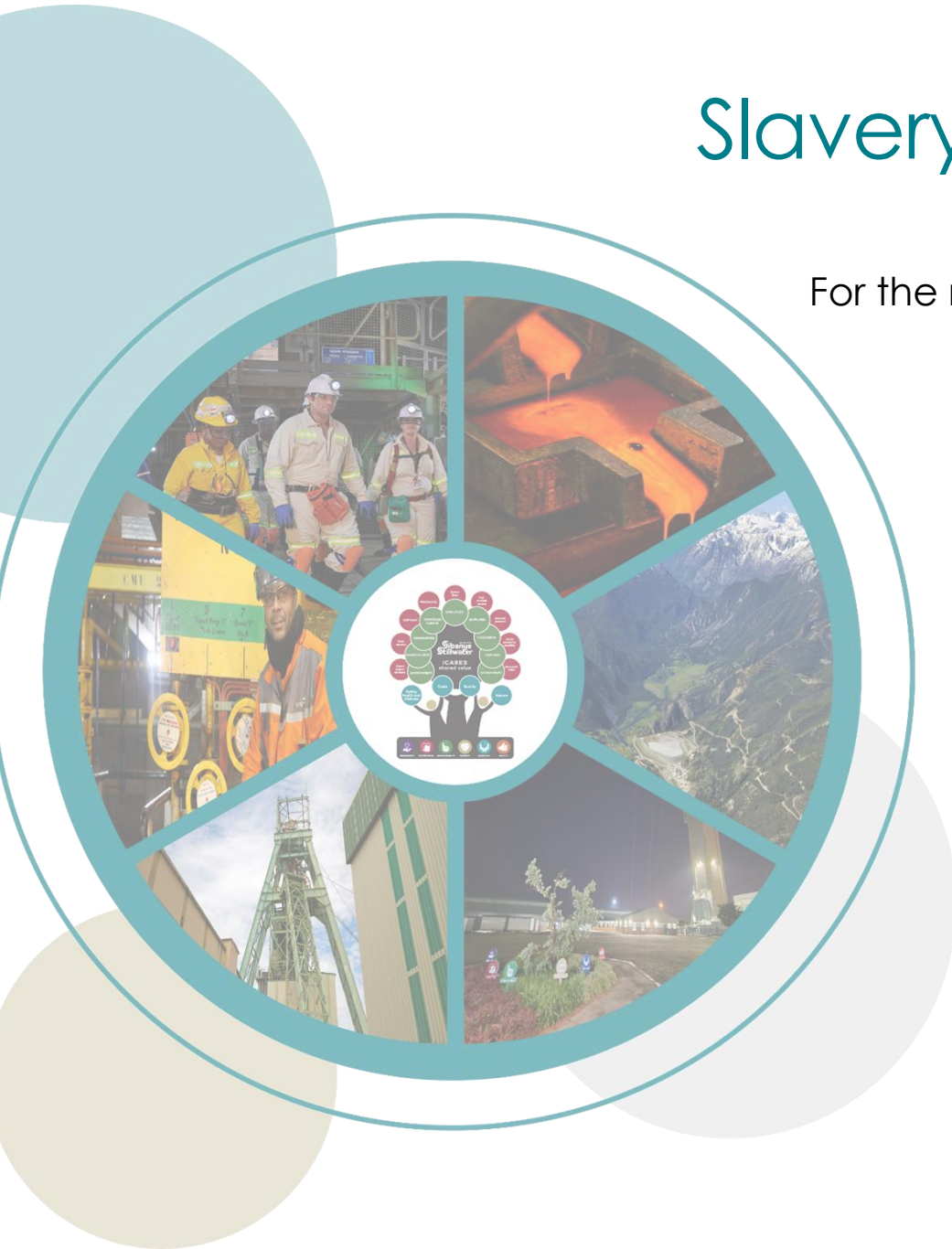


# Modern Slavery Statement

For the reporting period ending  
31 December 2023



INNOVATION



COMMITMENT



ACCOUNTABILITY



RESPECT



ENABLING



SAFETY

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## 1. INTRODUCTION

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This statement has been prepared by Sibanye Australia Pty Ltd (ACN 665 665 798) (**Sibanye Australia**), a wholly owned subsidiary of Sibanye Stillwater Limited (**Sibanye-Stillwater**), to meet the requirements of the Australian *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) for the reporting period of 10 February 2023 to 31 December 2023 (**reporting period**).<sup>1</sup>

This is Sibanye Australia's first statement published in accordance with the Modern Slavery Act, following the acquisition of a controlling interest in New Century Resources Pty Ltd (ABN 53 142 165 080) (**New Century Resources**) on 22 February 2023.<sup>2</sup>

This statement captures the activities of Sibanye Australia as the reporting entity for the reporting period under the Act, along with the entities which Sibanye Australia owns or controls, including New Century Resources.

This statement outlines Sibanye Australia's commitment to identifying and minimising the risks of modern slavery in our operations and supply chain. No instances of modern slavery have been identified in our business during the reporting period.

References in this statement to the collective terms 'we', 'us' and 'our' are references to Sibanye Australia and the entities that Sibanye Australia owns or controls, including New Century Resources, unless otherwise indicated.

Sibanye Australia is committed to delivering the Sibanye-Stillwater purpose, which is *to safeguard global sustainability through our metals*. This purpose reflects our aspiration to make positive social and environmental impact through the commodities we mine and produce, how we do that, and recognising the role we have in decarbonising the global economy.

Our vision, *to be a leader in superior shared value for all stakeholders*, reflects our belief that responsibly derived minerals are the source of significant economic, social and environmental benefit to society, both globally and locally. Our policies, practices and systems, including our Human Rights Policy, are based on the United Nations Global Compact Principles, the United Nations Universal Declaration on Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and the applicable laws of each jurisdiction in which we operate. The proactive principles in our policies are reflective of our commitment to ensuring that Sibanye-Stillwater does not subject any employee or contractor to modern slavery or forced or compulsory labour, in any of our operations or supply chains.

## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

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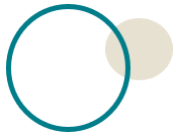
At the commencement of the reporting period, Sibanye-Stillwater held a 19.99% shareholding in New Century Resources. In February 2023, Sibanye-Stillwater launched an off-market takeover offer for all the remaining shares in New Century Resources that it did not already own. A positive response to the bid from New Century Resources' shareholders saw Sibanye-Stillwater's shareholding increase from 19.9% to 100% in

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<sup>1</sup> The reporting period commences on 10 February 2023 as that is the date on which Sibanye Australia was incorporated.

<sup>2</sup> On 14 February 2024 New Century Resources was renamed Sibanye Stillwater Australia Operations Pty Ltd.





May 2023.

After becoming a wholly owned subsidiary of Sibanye-Stillwater New Century Resources (ASX:NCZ) was removed from the Official List of the ASX in May 2023.

Following the acquisition by Sibanye-Stillwater:

- New Century Resources and each of its subsidiaries changed their financial year end to 31 December (previously 30 June), to synchronise with the financial year end of the other members of the Sibanye-Stillwater Group; and
- New Century Resources' business and operations have been integrated into Sibanye Australia.

As a result of the above changes, New Century Resources is not required to lodge consolidated accounts for the period from 1 July 2022 to 31 December 2023 and does not meet the revenue threshold to be a reporting entity. Sibanye Australia has lodged consolidated accounts for the reporting period and does meet the revenue threshold to be a reporting entity.

Sibanye Australia's operations and supply chains for the reporting period were substantially the same operations and supply chains as those of New Century Resources.

## 2.1. Structure

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Sibanye-Stillwater is a multinational mining and metals processing group with a diverse portfolio of projects and investments across five continents. It is one of the foremost global recyclers of PGM (platinum group metals) autocatalysts and has controlling interests in leading mine tailings retreatment operations.

Globally, Sibanye-Stillwater has established itself as one of the world's largest primary producers of platinum, palladium, and rhodium and is a top-tier gold producer. It also produces and refines iridium and ruthenium, nickel, chrome, copper and cobalt. Sibanye-Stillwater has recently begun to build and diversify its asset portfolio into battery metals mining and processing and is increasing its presence in the circular economy by growing and diversifying its recycling and tailings reprocessing operations globally.

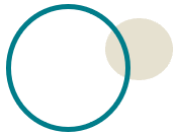
Sibanye Australia (a wholly owned subsidiary of Sibanye-Stillwater) owns and operates the Century zinc tailings retreatment operation, which is located at Lawn Hill, 250 kilometres north-west of Mount Isa in the Lower Gulf of Carpentaria. In November 2023, Sibanye Australia acquired the Mt Lyell Copper Project, which is located near the township of Queenstown on the West Coast of Tasmania.

Sibanye-Stillwater's head office is located in Weltevreden Park, South Africa. Sibanye Australia's registered office is located in Melbourne, Victoria.

During the reporting period of 1 July 2022 to 31 December 2023, New Century Resources maintained a controlling interest in a number of subsidiaries in Australia. These include:

- Century Mining Pty Ltd, which owns the Century zinc tailings retreatment operation and associated infrastructure (along with Investment Co Pty Ltd, which holds key port and pipeline infrastructure) and is the primary operating entity in the Australian Group;
- Copper Mines of Tasmania Pty Ltd, which owns the Mt Lyell Copper Project and associated infrastructure (acquired in November 2023); and
- various other Group entities which have limited financial and operational functions in the context of the overall business.

In May 2023, Sibanye Australia acquired a 100% interest in New Century Resources and is now the parent entity of the Australian Group.



## 2.2. Operations

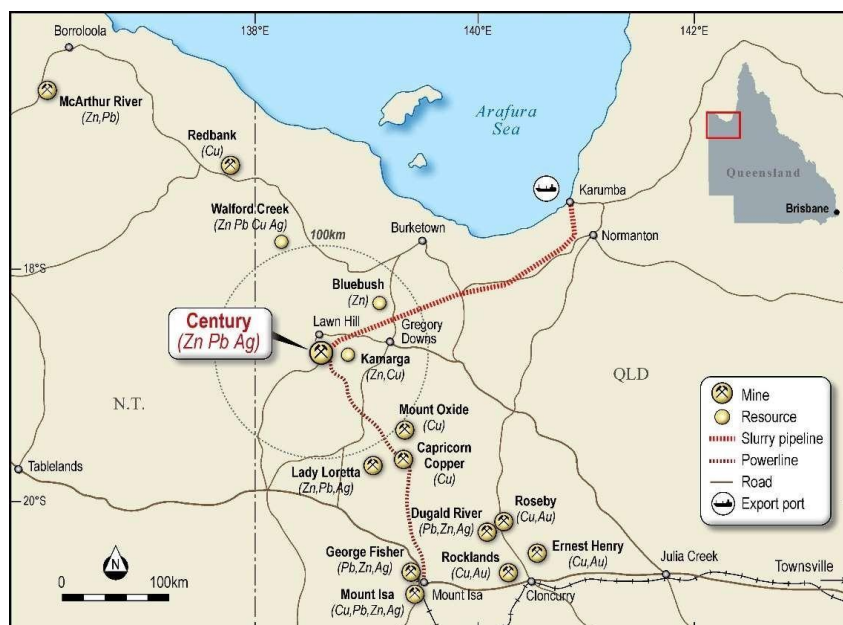
Sibanye Australia's principal operations for the reporting period included the mining and processing of tailings materials containing zinc, sales of concentrate, undertaking exploration activities and assessing business development opportunities. As outlined below, we consider the overall inherent risk of modern slavery in our operations to be low.

We recognise the broader operations of Sibanye-Stillwater are in some cases operating in jurisdictions that have a higher inherent risk of modern slavery. The scope of this statement is Sibanye Australia's operations and supply chain. At the Sibanye-Stillwater Group level, it is noted that there are policies, monitoring and procedures in place to manage the risk of modern slavery across all of Sibanye-Stillwater's operations and supply chain.

### 2.2.1. Century operation

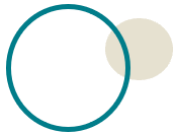
The Century zinc tailings retreatment operation is located at Lawn Hill, 250 kilometres north-west of Mount Isa in the Lower Gulf of Carpentaria. Prior to New Century Resources' and Sibanye Australia's period of ownership, the Century operation began as an open pit mine in 1999. During 16 years of open pit operations, Century was one of the largest zinc mines in the world, producing an average of 475,000 tonnes per annum of zinc metal and 50,000 tonnes per annum of lead metal using conventional open pit mining, grinding and flotation operations. The final processing of open pit ore at Century took place in early 2016, following which the focus of the previous owner turned to the progressive rehabilitation and ultimate closure of the mine site.

New Century Resources acquired the Century operation in February 2017 and commenced tailings retreatment operations in August 2018. Since that time, tailings ore has been hydraulically mined and pumped to the Century processing plant to recover the contained zinc. Processed concentrates are then transferred from Lawn Hill in slurry form via a 304-kilometre underground pipeline to the port facility at Karumba, on the Gulf of Carpentaria. Concentrates are dewatered at Karumba and transported on the M.V. Wunma transshipment vessel to export ships anchored offshore, and then sold to smelters based predominantly in China, with smaller portions sold to smelters in Australia and other parts of Asia.



**Figure 1: Century operation and regional infrastructure**





Sibanye Australia is continuing tailings retreatment activities at the Century operation, as has been done since the restart in 2018. Century is currently the largest tailings retreatment operation in Australia. Its integration into Sibanye Australia further establishes Sibanye-Stillwater as a global, ESG-focused industry leader in tailings reprocessing.

Sibanye Australia continues to explore opportunities to extend the mine life at Century, including through the potential development of the Silver King and the East Fault Block deposits.

The Century operation has a 360-room camp (including wet/dry mess, recreational facilities and water treatment facilities) and a private airport with sealed runway (suitable for medium-sized jet aircraft). The airport currently accommodates 100 seat Fokker jets.

### **2.2.2. Karumba port facility**

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The Karumba port facility includes dewatering and drying circuits, a maintenance workshop, a concentrate storage shed and administration buildings. Product slurry from the concentrate pipeline is dewatered by pressure filters, with concentrate then passed through a rotary dryer to remove excess water before being stockpiled in the concentrate storage shed in preparation for shipping.

We also own and operate a transshipment vessel, the M.V. Wunma, which is custom-built for the shallow waters of the Norman River channel and is used to transfer concentrate to export ships anchored in the Gulf of Carpentaria.

It takes approximately 12 hours for the vessel to load, transport and discharge concentrates and return to the Karumba port. The vessel is able to operate day and night, depending on tides and weather conditions.

### **2.2.3. Mt Lyell Copper Project**

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In addition to our primary operations in Queensland, we recently acquired the Mt Lyell Copper Project in Tasmania.

Mt Lyell is a previously operated underground copper mine (with gold by-products), which commenced production in 1894 and operated until it was put on care and maintenance in 2014. A feasibility study, which considers the re-establishment of the operation, is underway. Sibanye-Stillwater will review its options in respect of Mt Lyell upon completion of the feasibility study.

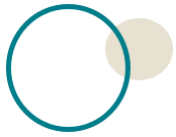
The Mt Lyell Copper Project has not been included in the risk assessment process for this reporting period due to it not being in operation. It has been separately assessed by Sibanye Australia as being a low risk of modern slavery.

### **2.2.4. Supporting operations**

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The Century and Karumba port operations, and the newly acquired Mt Lyell Copper Project, are supported by a head office team which consists of functions including sales and marketing, community relations, corporate affairs, sustainability, business development, human resources, finance, legal, company secretarial, information technology, procurement and logistics.

Within the reporting period, Sibanye Australia employed 349 people, of which 99% were employed on a permanent full-time basis (the remaining 1% were part time or casual employees). A total of 305 employees



worked in operations at Century and Karumba Port, 21 worked at the Mt Lyell Copper Project<sup>3</sup> and 23 worked in our corporate and commercial teams. Our employees are predominantly located in Australia, in either Queensland, Tasmania or Victoria. A total of 692 contractors were engaged at our Century (509) and Karumba (183) operations across the reporting period, the majority of whom worked in asset management. The number and location of contractors within our business varies from time to time.

### 2.3. Supply chain

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We seek to build sustainable, long-term and mutually beneficial relationships across our supply chain. Wherever possible, we focus on sourcing from Australian suppliers and have processes in place to integrate environmental, social and governance considerations into our decision making. We have an extensive supply chain which covers a range of supply categories, including:

- Mining equipment and services;
- Building and construction;
- Electricity and electrical services;
- Testing and inspection services;
- Transportation and logistics (excluding shipping);
- Shipping;
- Chemicals and fuel;
- Work apparel (including PPE);
- IT and software;
- Hire equipment;
- Reagents and bulk quicklime;
- Fire equipment maintenance services;
- IT managed services; and
- Labour hire.

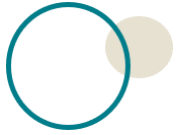
The composition of our supply chain in the current reporting period is largely consistent with the previous reporting period. During the reporting period, we directly engaged 657 suppliers across the above categories with a total spend of over \$227.7 million. Of these suppliers, 642 (or 97.7%) were Australian-based (though some components of goods and services were sourced from overseas by these suppliers). Approximately 82% of our suppliers were located in Queensland, Australia, thereby supporting our objective of engaging with local supply chains wherever possible.

The 15 suppliers not based in Australia (five of whom provide shipping and shipping-related services) were based in North America, the United Kingdom, Thailand, Korea, the Philippines and Germany.

We remain focused on addressing the risks of modern slavery within our tier-1 suppliers and improving our understanding of risk beyond tier-1. For the purposes of this statement, tier-1 suppliers are those suppliers with whom New Century Resources has a direct contractual relationship.

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<sup>3</sup> Since 17 November 2023.



Our 30 largest suppliers by value make up approximately 65% of the value of our supply chain and include companies which supply electricity and electrical supplies/services, grinding media, pumps, engineering services, processing plant equipment, transportation and logistics supplies/services, chemical supplies, and mining equipment supplies and services.

### **3. IDENTIFICATION OF MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN**

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While there have been significant changes to the corporate structure of our business during the reporting period, the impacts on the management structure, operations and supply chains for the Century and Karumba operations have not been material. The work of the Modern Slavery Steering Committee (see section 4.4) and the broader business in identifying modern slavery risks has continued largely unaffected, including the management and implementation of the risk assessment conducted during the reporting period (see further below).

#### **3.1. Operations**

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Business operations at the Century zinc tailings retreatment operation have remained largely the same throughout the reporting period, which includes the period of transition and integration of the New Century Resources business into the Sibanye-Stillwater Group.

During the reporting period, we completed a risk assessment to understand the risk of modern slavery in our operations. The risk assessment took into account the various components of our operations, as described in section 2.

All of our operations are conducted in Australia and, as set out above, over 99% of our employees are permanent full-time employees. Many parts of our operations require highly skilled employees which makes them lower risk from a modern slavery perspective.

As with previous reporting periods, we have considered the modern slavery risks of our contract employees, including a desktop review of any modern slavery concerns or allegations identified with their direct employers. While we did not identify any instances of modern slavery within these relationships, we still recognise them as carrying a higher modern slavery risk in comparison to our direct employees, particularly as some of our operations employ contractors from sectors that are higher risk in nature (e.g. mining and facilities operations). We recognise that labour hire can present a modern slavery risk due to the transitory nature of the work and reduced visibility over recruitment practices. We also acknowledge that our labour hire needs and contractors vary from week to week, which can make it challenging to identify risks in this area. We consider the inherent risk to be reduced somewhat because our labour hire workforce is entirely based in Australia, however this does not completely mitigate the risk.

While our operational teams have a somewhat higher modern slavery risk than our corporate and commercial teams due to the nature of the activities undertaken, given the factors described above and our robust recruitment and human resources processes, we consider our operations as a whole to be low risk.

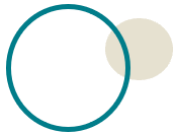
#### **3.2. Supply chain**

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Our supply chain arrangements remained largely the same as New Century Resources' arrangements in previous reporting periods and we have, to a large degree, continued to engage the same suppliers. The vast majority of our tier-1 supply chain is located in Australia, with only 15 suppliers located internationally.

As with previous reporting periods, we performed a risk assessment to understand the risk of modern slavery in our supply chain, considering factors such as the location of suppliers, the type of goods or services





obtained from those suppliers and a desktop review of any previous or suspected modern slavery allegations or incidents concerning our suppliers.

In performing this risk assessment, we had regard to various sources, including:

- the 2023 Global Slavery Index, prepared by the Walk Free Institute and which is the most authoritative guide to global modern slavery risk based on country;
- 'Hidden in Plain Sight', the Commonwealth of Australia's Final Report of the Inquiry into Establishing a Modern Slavery Act in Australia;
- the US Department of Labor's 2022 List of Goods Produced by Child Labor or Forced Labor (as of 28 September 2022);
- Verite's 'Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains' report; and
- the UN Global Compact Network Australia and Maritime Union of Australia's 2022 'Modern Slavery within Maritime Shipping Supply Chains' guidance.

As a result of this risk assessment, we identified the following categories that potentially present higher risks of modern slavery. We consider the other categories of our supply chain to be lower risk.

### **3.2.1. Work apparel (including PPE)**

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The work apparel (including PPE) component of our supply chain represents a moderate risk of modern slavery because such products are often manufactured in countries with a higher risk of modern slavery. While all of our tier-1 suppliers in this category are based in Australia, we acknowledge that there may be higher risk jurisdictions deeper in our supply chain.

### **3.2.2. Mining equipment and services**

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Modern slavery reports consider the mining industry to be inherently higher risk for modern slavery. This is generally due to the hazardous nature of the work and the generally low skilled workforce employed in the industry. We consider the inherent risk to be reduced somewhat because the mining supplies and services which we purchase are relatively technical in nature.

### **3.2.3. Building and construction**

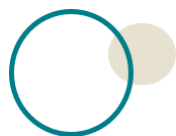
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The building and construction category covers a range of supplies from plumbing and concrete services to steel and plant hire. The construction industry is recognised as being potentially higher risk, because of the sometimes hazardous nature of the work and the relatively unskilled, temporary and low paid workers.

### **3.2.4. Chemicals and fuels**

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We are reliant on chemical processes to extract minerals from the tailings in our reprocessing operations. Chemicals in our supply chain present a greater inherent risk of modern slavery because of the hazardous nature of their production, associated low skilled workers, and the locations in which the chemicals may be manufactured. While our chemical and fuel tier-1 suppliers are based in Australia, we are aware that deeper in the supply chain these products are connected to higher risk geographies from a modern slavery perspective (including Singapore and China).



### 3.2.5. Transport and logistics (excluding shipping)

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We source transport and logistics from throughout Australia including flight charters to access our Century and Karumba operations and the supply of fleet and maintenance services. The transport and logistics sectors are considered to be an inherently higher modern slavery risk category because of the lack of visibility and the significant presence of contractors, agents and other intermediaries in the arrangements. The majority of our suppliers are located in Australia. We consider the inherent risk to be reduced somewhat because of the nature of transportation in parts of our supply chain (air, which is lower risk) and because the supply chain is located primarily in Australia and other low risk jurisdictions.

### 3.2.6. Shipping

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We use shipping services from international suppliers, including from suppliers based in inherently higher risk jurisdictions, such as Singapore.

During the period, we assessed our shipping suppliers in a standalone category, rather than including them in the assessment of our 'transport and logistics' industry category. This is because the shipping industry is considered to have an inherently high modern slavery risk, on account of the lack of visibility of the arrangements of the workforce working in this industry, distance from medical care and the potential for poor regulation of vessels internationally.

We are committed to building upon and improving our modern slavery risk assessment throughout each reporting period. For example, we have further tailored our operations assessment for this reporting period to account for contracted employees, and our supplier assessment has more nuanced categorisation to better reflect Sibanye Australia's risks. We also undertook a tailored survey of our top 38 suppliers to understand their modern slavery policies and risks. The response to this survey will be considered by the Modern Slavery Steering Committee as a part of developing the 2024 actions for continuous improvement.

## 4. CONTROLS TO ADDRESS MODERN SLAVERY RISK

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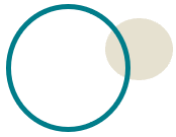
During the reporting period a range of controls were implemented to address modern slavery risks within our operations and supply chain.

### 4.1. Environmental, Social and Governance (ESG)

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Prior to the acquisition of New Century Resources by Sibanye-Stillwater, our ESG Committee assisted the Board to fulfil its oversight and monitoring of our practices and governance in various areas, including health, safety, environment and social performance. The ESG Committee oversaw the implementation of the ESG Strategy, adopted in the previous reporting period, including our then Human Rights Policy. The ESG Strategy involved, among other things, a commitment to broaden our existing sustainability work, including policies and frameworks regarding Indigenous peoples and human rights.

Following the acquisition by Sibanye-Stillwater, the functions of the New Century Resources ESG Committee and Board (including oversight of the ESG Strategy) have been integrated into the broader sustainability framework of Sibanye-Stillwater. Sibanye-Stillwater's vision is to be a leader in superior shared value for all stakeholders. These stakeholders include our employees, organised labour, communities, shareholders, environment, suppliers, customers, company and governments.



Our approach to sustainability is a key organisational value and our commitment to this is evident in Sibanye-Stillwater's commitment to transparency and sustainability credentials which include:

- inclusion in the Bloomberg Gender Equality Index 2023;
- being a CDP discloser in 2022 and receiving an A- rating for climate change and B rating for water security;
- completion and assurance against the World Gold Council's Conflict-Free gold Standard;
- being a constituent of the FTSE4Good Index Series;
- being a constituent of the FTSE JSE Responsible Investment Index;
- endorsement by the Extractive Industries Transparency initiative (EITI);
- membership of the International Council on Mining and Metals (ICMM);
- responsible sourcing accreditation from the London Platinum and Palladium Market (LPPM);
- being a participant and notable performer in the National biodiversity and Business Network of South Africa Biodiversity Disclosure Project;
- endorsement of the Responsible Gold Mining Principles developed by the World Gold Council; and
- being a participant in the United Nations Global Compact (UNGC).

Sibanye-Stillwater has brought this commitment to our Australian operations and is dedicated to providing oversight, monitoring and review of Sibanye Australia's practices and governance in a range of areas, including identifying and minimising the risks of modern slavery in our operations and supply chain.

## **4.2. Modern Slavery Steering Committee**

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Sibanye Australia has maintained the Modern Slavery Steering Committee that was established by New Century Resources in the previous reporting period. The Committee provides a forum for stakeholders from different functions and business units<sup>4</sup> to oversee and evaluate how we assess and address our modern slavery risks, as well as the review and endorsement of this statement.

In the reporting period, key actions taken by the Committee were:

- review and update of the Committee's Terms of Reference;
- completion of modern slavery training for all of the Committee members;
- completion of a survey to gather insights into the Committee's competency and understanding of modern slavery, as well as the efficacy of the current modern slavery targeted actions;
- a survey of Sibanye Australia's top 38 suppliers; and
- review and endorsement of the modern slavery risk assessment process.

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<sup>4</sup> Including sales and marketing, community relations, corporate affairs, sustainability, human resources, finance, legal, company secretarial and procurement and logistics.

### 4.3. Tone from the top/values

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Consistent with prior reporting periods, our values continued to guide all of our work across the business. These values are: Teamwork, Open & Honest, Respect, Can-Do, Innovate & Learn and Owner's Mindset. These values are communicated to everyone that attends an operating site through our induction process and are reinforced through the actions of our people. They have helped underpin the development and fostering of a culture that aligns to our values and vision.

Following the acquisition of New Century Resources by Sibanye-Stillwater, these values are being integrated into the Sibanye-Stillwater iCARES values, which are: Innovation, Commitment, Accountability, Respect, Enabling and Safety.

The Sibanye Australia Regional Leadership Team is unanimous in the approach of zero tolerance for modern slavery in our supply chains and at every stage of our operations. In addition to setting the appropriate behaviours and expectations, the Leadership Team monitors our culture through regular reporting of employee metrics and on the ground engagement with staff at our offices and operations.

### 4.4. Policies

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New Century Resources' policy suite is in the process of being integrated into the Sibanye-Stillwater framework. During the reporting period the New Century Resources Sustainability Policy set out our commitment to respecting human rights in line with the United Nations Guiding Principles on Business and Human Rights at every stage of our operations. This recognised that our commitment to human rights extends beyond our operations to our supply chain and that we must seek to engage with our suppliers and customers to mitigate human rights risk.

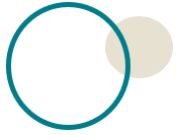
Following the acquisition of New Century Resources, we now adhere to Sibanye-Stillwater's Code of Ethics, which applies to all directors, officers, employees and contractors of Sibanye Australia (together **employees**) and supports the implementation of four core philosophies:

- Ethics and Corporate Governance Philosophy;
- Human Rights Philosophy;
- Responsible Mining Philosophy; and
- Sustainable Development Philosophy.

Together our Code of Ethics and philosophies are critical to achieving our purpose of improving lives through mining and our vision of creating superior value for all of our stakeholders.

The Code of Ethics sets out the expectations for employees and aims to encourage appropriate standards of conduct. In particular, the Code of Ethics requires employees to act honestly, in good faith and with utmost integrity and comply with the spirit as well as the letter of the law and the Code of Ethics. The Code of Ethics sets out Sibanye-Stillwater's commitment to conducting its operations in a manner that protects the health and safety of all employees, contractors and community members.

Sibanye-Stillwater's policies, practices and systems, including the Human Rights Policy, is based on the United Nations Global Compact Principles, the United Nations Universal Declaration on Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and applicable laws of each jurisdiction in which we operate. The proactive principles in our policies are reflective of our commitment to ensuring that Sibanye-Stillwater does not subject any employee or contractor to modern slavery and forced or compulsory labour in our operations or supply chain.



We seek to work with suppliers that hold the same values that we hold, to ensure we and they meet the social requirements of our policies.

#### **4.5. Training and awareness**

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As mentioned above, the Modern Slavery Steering Committee (which consists of stakeholders from a number of functions and business units) undertook dedicated training on modern slavery during the reporting period, including the meaning of the term, the legislative environment in Australia, global trends, examples and actions we can take to assess and address our risk.

To support our continuous improvement to better understand the nature and risks of modern slavery, we have also undertaken tailored surveys of the Committee and our top 38 suppliers. In 2024 the Committee will review the findings of this survey and identify priority actions for the Committee to take forward. This reflects our commitment to maintain and improve our knowledge of modern slavery risks throughout our business.

#### **4.6. Relationships with third parties**

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Our standard procurement terms and conditions contain modern slavery provisions including an obligation on our suppliers and each of their sub-suppliers to comply with the Modern Slavery Act and to take reasonable steps to ensure that there is no modern slavery or human trafficking in their or their sub-suppliers' supply chains or in any part of their operations. Sibanye Australia also requires its zinc concentrate customers to provide certain warranties regarding modern slavery in their operations and supply chain and to comply with applicable anti-slavery and human trafficking laws.

Acknowledging the modern slavery risks that labour hire employees may present (as outlined above), we attempt to mitigate this risk by maintaining arrangements with key companies for longer term periods. Other short term contractors performing works on site are engaged through approved suppliers, following a review of labour hire onboarding documentation, including medicals to improve workplace safety.

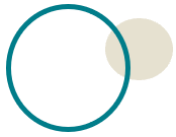
During the reporting period we asked 38 of our key suppliers to complete a modern slavery survey. The survey was drafted to identify any risks of modern slavery in our suppliers' operations and supply chains and inform us how they are seeking to manage those risks. Twenty (20) of these suppliers responded to the survey and all of these have a modern slavery, or equivalent, policy in place. The Modern Slavery Steering Committee has taken it on as an action to determine a process of follow-up and escalation to engage with the suppliers that did not complete the survey.

### **5. EFFECTIVENESS OF CONTROLS**

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Sibanye Australia is committed to eliminating modern slavery in its operations and supply chain. The Sibanye Australia Regional Leadership Team and workforce are continuing to focus on gaining a better understanding of where modern slavery risks may be present in our operations and supply chain and establishing actions to mitigate these. The team also evaluates the effectiveness of the actions we have taken to assess and address our modern slavery risks.

To evaluate the effectiveness of the actions we have taken to assess and address modern slavery risks in our operations and supply chains, our Modern Slavery Steering Committee maintains oversight of our modern slavery controls and processes. Through that oversight, the Committee assesses whether our actions to understand and address modern slavery risks are working and how they might be improved. Both qualitative and quantitative metrics are used. For example, as mentioned in the training section above, the Committee has been active during the reporting period, including the completion of training and a survey on modern



slavery. Insights from the survey demonstrate that the Committee has high competency in understanding what modern slavery is and how to identify and manage this risk in our operations and supply chain. The process that we are using to build competency in this area is well understood, as well as who is responsible for implementation.

We also use incident and grievance management as a tool to assess the effectiveness of the measures we implement and identify potential gaps in how they are being managed. Effective grievance mechanisms provide near term and regular feedback on working conditions. Our policy is to seek to ensure that confirmed grievances (in all areas of the business, not just modern slavery) are resolved as soon as practicable.

Through our use of supplier surveys and other procurement processes, we engage with our suppliers, business partners and external stakeholders for input and feedback on modern slavery risks, controls and effectiveness.

We also undertake sustainability due diligence prior to capital allocation decisions.

## **6. CONSULTATION WITH OWNED AND CONTROLLED ENTITIES**

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The management, assets and operations of our Australian business is transitioning to operate under the global policies and processes of Sibanye-Stillwater, including in relation to human rights. Sibanye Australia has consulted the relevant companies that it owns or controls in the development of this statement.

## **7. APPROVAL AND SIGNING REQUIREMENTS**

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This statement was approved by Barry Harris as the sole Director of Sibanye Australia on 13 March 2024.

**Barry Harris**  
**Sole Director**