

# Modern Slavery Statement

## 2023-2024

**At Greater Whitsunday Alliance Limited (GW3) and its entity C-Res, we see respecting human rights as critical for our ability to contribute meaningfully to community and society at large. We value the rights of every participants within our supply chain and we take active steps to communicate and enforce that expectation wherever possible.**

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

This is GW3's fourth Statement and C-Res' fifth Statement in response to the Australian Modern Slavery Act. This Statement describes the activities we have undertaken throughout the 2024 financial year to strengthen our processes and better understand the risks of modern slavery and human trafficking in our operations and supply chains.

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

This statement has been presented to both Greater Whitsunday Alliance and C-Res Board of Directors for their review and endorsement.

## About

### GW3

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

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

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

GW3's Constitution stipulates our not-for-profit intention and status and the structure of the organisation and delivery of services and projects, reflects this intention.

### C-Res

C-Res is a wholly owned subsidiary of Greater Whitsunday Alliance (GW3) and was established in 2012 to deliver the Local Buying Program in Queensland for BMA. Since then, the Local Buying Program's ongoing success has seen it expand to all BHP Minerals Australia core assets. During financial year 2024, the Local Buying Program was delivered through strategic partnership between C-Res and the following BHP Minerals Australia core assets (including Queensland Coal: BMA):

- BHP Mitsubishi Alliance (BMA) - Queensland
- BHP Operational Services
- NSW Energy Coal – New South Wales
- Olympic Dam – South Australia
- Nickel West (NiW)
- Western Australia Iron Ore – Western Australia
- Western Australia Petroleum – Western Australia
- Through this strategic partnership, the Local Buying Program has supported regional economic development in the communities where BHP and BMA operate.

In each state of Australia the Local Buying Programs, have established independent Local Buying Foundations that focus on building sustainable business communities for the future. By enhancing local capabilities and opportunities for growth in current and emerging industries, these Local Buying Foundation support projects and programs that facilitate workforce development, innovation and the productive capacity of businesses and industry to grow the potential of their regional economies.

These Foundations are managed by representatives of the communities of interest to ensure investments have the greatest possible impact. For more information about the Foundations including funding rounds, opportunities and governance please visit [www.localbuyingfoundation.com.au](http://www.localbuyingfoundation.com.au)

## Vision

### GW3 Vision, Role, Values and Governance

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

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

The vision is supported by our **core role** of:

- Advocate:** Be a strong voice for economic development opportunities on behalf of the region
- Attract:** Encourage investment, funding and business growth in the region
- Collaborate:** Convene, partner and facilitate alignment of key stakeholders to advance collective objectives
- Inform:** Track and consolidate economic development resources and data to inform strategic decisions.

During FY24, the GW3 staff cohort developed a set of **value statements** which guide operational delivery:

- Lead with **integrity** and compassion
- Approach every day with **curiosity**
- Drive evidence-based **innovation**
- Show commitment to **collaboration**
- Understand global, deliver **regional value**

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

### C-Res Vision, Purpose and Values

The wellbeing of our people, the communities we live and work in, and the environment is central to everything we do, guided by our core beliefs and values.

We strive to integrate these values into our decision-making and actions by considering the needs of our diverse stakeholders and seeking new, innovative solutions that foster mutual benefit.

Our approach is defined by our **Vision, Purpose and Values** which clearly outline the foundation for developing and implementing sustainable practices in all our initiatives.

We recognise that operating with respect for human rights and a commitment to strong governance and anti-corruption is essential not only to the sustainability of our business but also for effectively understanding and addressing risks related to modern slavery and human trafficking.

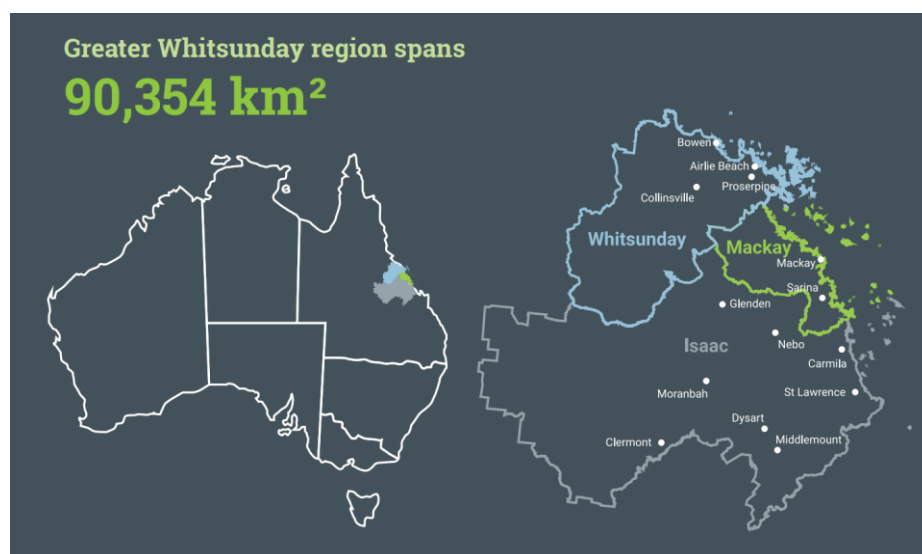


## Entity Structure

### GW3 Organisational Structure and Operations

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

The organisation also supports remote working arrangements to enhance staff wellbeing and productivity by providing greater flexibility and work-life interaction.



### C-Res organisational structure and operations

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

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

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

Our principal operations and locations are below:



## Supply Chain

### GW3

GW3 has identified that our direct operational supply chain is at a low level of Modern Slavery risk, however that does not mean our approach to minimization is not genuine. Our supply chain is very minimal and predominately regional Queensland or Queensland based, with no off-shore procurement or jurisdictional risk identified over the last 12 months.

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

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

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

During the 2025 financial year, GW3 will introduce a supplier onboarding pack, which makes our external suppliers, including consultants, agents, contractors and service providers aware of our expectations with regard to modern slavery provisions and our commitments to uphold human rights.

## C-Res

Our direct operational supply chain is minimal and every Local Buying Program (LBP) supplier is required to undertake a thorough due diligence process to ensure there are no human rights-related risks.

Although we do not directly engage in activities such as delivering goods or providing services at BHP operational sites, we are acutely aware of the modern slavery risks present in the sector in which BHP operate. To effectively manage these risks, all LBP suppliers (BHP direct supply chain) and LBP funding applicants are required to undertake a stringent due diligence process which is reviewed annually to mitigate risk associated with anti-corruption and human rights-violations.

The *Local Buying Program Operating Guidelines* establishes essential minimum mandatory requirements for suppliers of non-traded goods and services, which includes:

- LBP Suppliers are required to register and meet eligibility criteria before being recognized as eligible LBP suppliers for BHP
- LBP Suppliers are required to meet minimum governance and ethical compliance standards, including comprehensive due diligence checks

In FY2020 BHP developed an Ethical Supply Chain and Transparency Guide, which is accessible to all direct and indirect suppliers at [bhp.com](https://www.bhp.com). This guide supports their commitment to continuous improvement and fosters collaboration with our suppliers. The primary intent of the guide's is to enhance the capability of their suppliers in fulfilling the established minimum requirements.

This guide complements the relationships BHP and C-Res maintains with suppliers and aligns with the ongoing work opportunities of BHP's Procurement team. C-Res successfully integrated this guide into all supplier registrations in FY2022 and continues to apply its principles into daily operations.

## Policies and Governance

### GW3

During the 2024 financial year, our business remains steadfast in its commitment to eradicating modern slavery within our operations and supply chain. We continue to enforce stringent due diligence processes, ensuring all our suppliers adhere to ethical labor practices and comply with Australian Modern Slavery legislation.

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

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

GW3 has an extensive policy and procedure framework designed to mitigate all forms of risk associated with employing, managing and retaining a geographically disperse workforce. This



framework provides confidence in the quality of our people and supports our belief that our people pose minimal modern slavery-related risk. All GW3 employees must comply with this policy framework and review policies twice yearly.

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

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

These policies are reviewed every three years by the Finance, Audit and Risk Committee to and are essential for sustaining ethical operations and contributing to the global effort to eradicate modern slavery.

## **C-Res**

Every member of our workforce, whether directly involved in operations or supporting our initiatives, is guided by our *Vision, Purpose and Values* as well the *C-Res Code of Conduct* and BHP's *Our Charter, Our Code of Conduct (Our Code)* alongside the *Supply Our Requirements* standards.

All LBP suppliers operating at BHP's operated assets must adhere to BHP's health, safety, environmental and community (HSEC) standards.

C-Res is dedicated to engaging and encourage LBP suppliers to maintain business practices and workplace standards that are align with our own.

In FY2024, we focused on enhancing awareness of governance and compliance by conducting annual audits of supplier registrations. We adhere to internal policies with automated systems that block LBP suppliers from participating in the Local Buying Program upon their first instance of non-compliance.

## **Access to remedy**

### **GW3**

Despite our limited supply chain, GW3 understands that human rights and modern slavery risks are present in businesses of all sizes. Stakeholders who have concerns about our commitment to our vision and role can address their issues directly with the CEO or the Chairperson of the Board as per the GW3 Grievance Policy. GW3 has received no notices of breaches to our commitment to human rights and modern slavery in the 2024 financial year.



## **C-Res**

We have established mechanisms to address stakeholder concerns of stakeholders regarding potential breaches of our vision, purpose and values, as well as other business conduct issues. All issues or grievances can be submitted through our Contact Us form which is available on our website and will adhere to our *Managing Conflict and Grievance Policy* for resolution.

Complaints and grievances and reports received are required to be logged in our register. This allows us to improve our investigation, management and analysis of issues and impacts. In FY2024, no complaints received through these mechanisms related to modern slavery or human trafficking.

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

We acknowledge and investigate, all concerns raised through these channels as appropriate. Where concerns are investigated and substantiated, we take remedial actions, inform the reporter when appropriate and document the outcomes.

Our *values* strictly prohibit any form of retaliation against individuals who raises a concern or participates in an investigation. In FY2024 no incidents of modern slavery or human trafficking in breach of our C-Res or LBP policies have been received into Ethics Point.

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

## **Due diligence and risk management in our business**

### **GW3**

As an organization, GW3 assesses and manages risk, including human rights and modern slavery through a formal risk register management framework. Risk is an agenda item for discussion at every GW3 Board meeting and this provides the opportunity to Directors and senior leadership to monitor risks and implements controls accordingly.

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

## **C-Res**

We identify, assess and manage risks that either C-Res or BHP are exposed to, including human rights risks. The C-Res Board and Leadership Team monitors these risks and review the effectiveness of the C-Res Strategic Risk Register and internal controls annually.

To understand and manage the risks that C-Res or BHP (through the LBP) is exposed to, we apply a risk rating process within our Strategic Risk Register. This rating process helps us to identify current risks (which may be strategic or operational in nature), as well as emerging risks. We assess these risks, implement appropriate controls and regularly review performance to enable risks to ensure effective management.

Additionally, our annual internal and external audits evaluate the design and effectiveness of our sustainability processes. The findings are considered in the development of action plans to address necessary improvements and these results are reported to the C-Res Board and Leadership Team, which is responsible for the day-to-day management of C-Res.

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

### **GW3**

Over the course of financial year 2024, GW3 continued to raise the awareness of human rights and modern slavery through our Request for Quote / Tender process. Additionally, the organisation champions mental health and wellbeing, ongoing professional development and a focus on workplace health and safety to support best practice business operations. Whilst we are unable to guarantee compliance within our indirect supply chain we deploy the following controls:

- Modern Slavery procurement questionnaire and GW3 position statement
- BHP Anti-Corruption and Conflict of Interest training for all GW3 staff undertaken in financial year 2024 (offered via our subsidiary company C-Res).

### **C-Res**

In FY2024, we continued to build opportunities to engage and foster relationships with BHP, our suppliers, and stakeholders to promote awareness of human rights, alongside other issues such as mental health, business resilience, and enhanced employment and training opportunities. While we acknowledge there are limitations to our ability to influence our indirect suppliers, we work constructively with our direct suppliers to strengthen their capacity and that of their own supply chains.

Controls include:

- Ethical Supply Chain and Transparency Guide – fully implemented FY2022 and adopted into ongoing operations
- Minimum criteria requirements for suppliers to become an approved LBP Supplier
- Annual BHP Anti-Corruption & Conflict of Interest training for all C-Res staff undertaken in FY2024.

## Assessing effectiveness

### GW3

GW3 monitors effectiveness of our commitment to modern slavery through:

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

### C-Res

We regularly assess the effectiveness of our governance and compliances processes through the following methods:

- Investigation and analysis of complaints, grievances and reports of issues received through established mechanisms (refer Policies and governance section)
- Implementation of our annual internal audit program to ensure adherence and identify areas for improvement
- Conducting an annual review of all LBP suppliers to evaluate their compliance
- Continuous improvement initiatives which are documented in dedicated continuous improvements register
- Regular engagement and collaborating with BHP and other stakeholders to enhance our governance practices

## Consultation

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

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

### GW3

This joint statement has been reviewed and supported by the board of GW3 as the parent entity on Tuesday November 26, 2024. See attached minutes confirming Board of Director approval.

## C-Res

This joint statement has been reviewed and supported by the board of C-Res as the subsidiary entity of GW3 on Wednesday November 20, 2024.

## Looking forward

### GW3

Despite the limited nature of our supply chain, GW3 will focus on:

1. **Maintaining compliance levels** with our suppliers; and
2. Continuing to **improve awareness** of human rights and Modern Slavery with our internal operations team.

During the 2025 financial year, GW3 will introduce a supplier onboarding pack, which makes our external suppliers, including consultants, agents, contractors and service providers aware of our expectations with regard to modern slavery provisions and our commitments to uphold human rights.

In addition, offering team professional development with regard to mental health and wellbeing will be a continued focus of the organisation.

### C-Res

We will concentrate our efforts on ensuring compliance with governance and due diligence processes across our organisation, our direct supply chain and all LBP suppliers. Our approach will encompass five critical elements:

1. **Strengthening Governance Frameworks:** We will enhance our internal governance structures to support transparency and accountability. This includes regularly reviewing our policies and procedures including those relating to modern slavery, ensuring they are aligned with current legislation and best practices.
2. **Due Diligence Practices:** We will implement robust due diligence processes to assess the risk of modern slavery within our operations and supply chains. This includes conducting thorough assessments of potential and existing suppliers, focusing on their labour practices and compliance with ethical standards.
3. **Supplier Engagement and Training:** We will engage directly with our suppliers to ensure they understand their responsibilities regarding modern slavery. This will include providing training and resources to help them recognise and address risks within their own supply chains.
4. **Monitoring and Reporting:** We will establish mechanisms to monitor compliance with our governance and due diligence processes. Regular audits and assessments will be conducted to ensure that all parties adhere to our standards.
5. **Collaboration with Stakeholders:** We will work closely with BHP, suppliers, and relevant stakeholders to share best practices, address challenges, and strengthen collective efforts against modern slavery.

By focusing on these areas, we aim to create a comprehensive framework that not only meets compliance requirements but also fosters a culture of respect and protection for human rights throughout our supply chains.



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

November 26, 2024.






# 1. Joint FY24 GW3 CRes Modern Slavery Statement - Final

Final Audit Report

2025-02-25

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