



Modern Slavery Statement

Norton Gold Fields Pty Ltd
FY2021

This is a joint modern slavery statement covering the activities of Norton Gold Fields Pty Ltd (ACN 112 287 797), Paddington Gold Pty Ltd (ACN 008 585 886), which are both reporting entities, and their owned and controlled entities (collectively, the **Norton Group**) during the year ended 31 December 2021.

This sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the board of Norton Gold Fields Pty Ltd on 14th June 2022.

About us

At the Norton Group, we recognise that respecting the human rights of those affected by our business activities is important. We are committed to 'Zero Harm' initiatives by striving to work to the highest safety standards to minimise potential harm to people, the environment and the communities in which we operate.

Our structure

Norton Gold Fields Pty Ltd is a company incorporated in Australia and our registered office is located in Kalgoorlie, Western Australia.

Norton Gold Fields Pty Ltd is a subsidiary of Zijin Mining Group Co. Ltd (**Zijin**), headquartered in China. Zijin and its subsidiaries have mining operations in countries throughout the world. While the Norton Group entities are a subsidiary of Zijin, the Norton Group entities have their own corporate policies.

Norton Gold Fields Pty Ltd has a number of owned and controlled Australian entities, including Paddington Gold Pty Ltd. Paddington Gold Pty Ltd is also incorporated in Australia with operations in Kalgoorlie.

Our operations

The Norton Group is one of Australia's largest domestic gold producers with mining and processing complexes located in Western Australia's Kalgoorlie gold region. Our key operations surround the Paddington Mill and we hold mining tenements covering more than 1,000km² of land around the Mill. Within this area, we engage in exploration, mining and the processing of gold ore, which is then transported to the Perth Mint for refining.

The Norton Group has operated exclusively in Western Australia throughout FY2021 and has continued to expand its operations in Western Australia through the progression of a series of low grade expansion projects, including our Binduli North Operations (**Project**). The Norton Group continues to successfully explore the Project, which will include the Binduli North heap leach mining operation and standalone processing infrastructure. Once commissioned, this Project is expected to significantly increase the Norton Group's gold production profile.

We engage approximately 463 employees, all residentially based in Perth or between Kalgoorlie and nearby Coolgardie. We also engage a number of contractors where required and expect our contractor engagement to increase significantly in future years as we continue to expand our operations.

Our supply chain

In 2021, the Norton Group's supply expenditure was approximately \$100 million. Our suppliers are primarily located in Australia, and we also continue to source services from key suppliers based in China, Thailand and other locations in Asia, Africa and South Africa. We recognise that more than 50% of our supplies by value (including from Australian suppliers) are still sourced from overseas locations.

Of our total supply chain, the Norton Group's key expenditure is in the following areas:

- construction materials.
- consumables (including fuel, lubricants, explosives and other specialty hydrocarbon products);
- mining equipment (crushers, grinding mills and drilling equipment);
- mining services (haulage and earthmoving, drilling & blasting, surveying and exploration); and
- logistics services.

We generally engage suppliers on standard terms, which are available on the Norton Gold Fields website: <https://nortongoldfields.com.au/terms-conditions/>.

Modern slavery risks

The Norton Group considers the risks of modern slavery in our supply chain to be reasonably low given our continuing focus on operations in Australia and ongoing relationships with suppliers. We nevertheless recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment

The Norton Group's supply chains and operations in FY2021 remained very similar to our FY2020 profile. We assessed the level of risk against our existing risk assessment framework and identified that there was still a low to medium potential for modern slavery risks, given that these suppliers and their operations have remained largely the same.

To identify potential risks in our supply chain and operations, the Norton Group has assessed our supply chain and operations for modern slavery risks against a number of modern slavery risk identifiers. These identifiers include sector and industry, the type of products and services, geographical location and specific entity risk. Our most important suppliers were individually reviewed and assigned a risk level for each of the identifiers, as well as an overall risk score which identifies them as either high / medium / low risk. The risk scores assigned were based on recognised indicators such as the [ACSI Modern Slavery Guide](#) and the [Global Slavery Index](#).

While a number of our suppliers presented medium risks, we did not identify any suppliers with a high modern slavery risk. Additionally, based on our initial reviews, none of our reviewed suppliers had a poor human rights record.

Overall, our initial risk assessment indicated that suppliers within our operations and supply chain have a low to medium potential for modern slavery risks, and this remains to be the case. Most of our supply chain risk is in our suppliers' complex supply chains which are not visible to the Norton Group. Where the risks of modern slavery are visible, the Norton Group's policies and procedures look to mitigate the risk as much as possible.

Risk profile

Our risk profile is summarised in the table below.

Risk	Description of risk
Sector /Industry	<p>There is a moderate modern slavery risk associated with the mining and resources industry (which Norton Group and its suppliers are a part of). The risks associated with mining are primarily in construction and logistics, and are most prevalent in high risk regions.</p> <p>The inherent risks associated with the mining and resources industry are mitigated for the Norton Group as our operations are limited to Australia. Additionally, as the Paddington Mill and surrounding mining infrastructure is mostly constructed, we engaged in little</p>

Risk	Description of risk
	<p>construction in 2021. The key companies we engaged in 2021 for logistics (including Zijin Mining Logistics Co., Ltd, part of the Zijin group) have policies in place addressing their employee working conditions.</p>
Product / Service	<p>A large portion of our supply expenditure is on consumables for mining and processing operations. These consumables include lubricants, chemicals, explosives. The risks of modern slavery at a direct supplier or manufacturing level are relatively low, as many of these products are highly specialised. The risks we identified are instead associated with the raw minerals used to produce these products further down the supply chain. Our direct suppliers of these products are generally Australian-based, have submitted their own modern slavery statements under the <i>Modern Slavery Act 2018</i> (Cth) and have policies addressing modern slavery risks.</p> <p>Another contributor to our supply expenditure is specialised mining services. These services include surveying, exploration, drilling and sampling. These services present a lower risk of employing base-level employees who are at a higher risk of being exposed to modern slavery as they are highly specialised. However, a number of our mining service suppliers are at risk of engaging in poor recruitment processes or temporary workers to assist with field work or sampling.</p> <p>Our key suppliers of these services have policies in place regarding working conditions. As mining services (e.g. drilling and exploration) are carried out within our mining areas, we have some visibility and ability to reduce these risks. All independent contractors engaged by the Norton Group are also required to complete a self-audit questionnaire to determine whether their engagement terms are indicative of an independent contract or employee relationship. This questionnaire allows us to ensure that proper working rights are afforded to people directly engaged by the Norton Group.</p>
Geographic	<p>A majority of our direct suppliers are located in Australia. Some of our suppliers reside in higher risk countries such as Thailand and China. However, we also understand a number of our Australian suppliers source products from higher risk countries.</p> <p>The countries our key suppliers are based in or source products from and their Prevalence Index Rank (out of 167) according to the Global Slavery Index are:</p> <ul style="list-style-type: none"> • Thailand (23); • China (111); • Brazil (142); • India (53); • Indonesia (74); • Vietnam (77); • South Africa (110); • Singapore (97). <p>Many of our key suppliers are large and reputable Australian suppliers of both products and services. These companies must also submit modern slavery statements addressing the risks within their supply chain. Many of these suppliers also address modern slavery risks within their corporate policies. We continue to work closely with all of our suppliers to understand and manage any modern slavery risks within our extended supply chain.</p>
Specific Entity	<p>While many of our key suppliers have modern slavery policies in place or are required to report, there are a number which appear to have done little to address the risks of modern slavery in their supply chains.</p> <p>The Norton Group are not aware of any actual modern slavery practices within our supply chain or operations.</p>

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. That is why we remain committed to identifying and conducting further due diligence on any suppliers that we identify as having higher modern slavery risks and

enhancing our existing processes to assess and address potential modern slavery risks. We did not identify any of our suppliers as high risk in the 2021 reporting period, therefore no further due diligence was undertaken. We will continue to monitor our suppliers in future reporting periods to ensure that suppliers who present high risks of modern slavery in their operations and supply chains are identified and further due diligence is undertaken to assist us to manage the respective risk.

Policies and Procedures

In FY2021, the Norton Group focused on developing and implementing a number of additional policies and procedures to improve our modern slavery compliance processes. This included introducing:

- A standalone Modern Slavery Policy which establishes our commitment to addressing modern slavery risks in our business and driving accountability for ethical business practices across our organisation.
- A Supplier Questionnaire to be completed by all Suppliers, Business Partners and Developers engaged by the Norton Group. This is intended to assist with our risk assessments processes, enhancing our ability to understand the extent to which suppliers address modern slavery risks in their operations and supply chains.
- A whistle-blower policy which outlines how an 'eligible whistleblower' is able to raise concerns about potential, suspected or actual misconduct through an objective, confidential and independent reporting and investigative mechanism.

These policies are intended to build on our existing policy framework to ensure that modern slavery is more thoroughly addressed in our corporate operations and supply chains, complementing the following policies previously implemented:

- Recruitment and Selection policy which ensures all of our recruitment activities are in accordance with Australian laws and the enterprise agreement;
- Protection from Bullying and Harassment Guideline which condemns and encourages the reporting of any instances of bullying or harassment;
- Health and Safety Policy which identifies, assesses and manages risks to employees and builds a culture of risk awareness;
- Environment and Community Policy which recognises the importance of meeting Commonwealth, State and Local legal requirements, not tolerating any form of discrimination or abuse as part of business activities; and
- Mental Health and Wellbeing Policy which ensures that staff have safe working environments, that realistic targets are set which do not require staff to work unreasonable hours and that support and assistance is available for all staff.

We also developed a standard modern slavery clause that is now included in all of our standard Services Agreements, which is the contractual mechanism through which our suppliers are engaged. Through signing the newly revised Services Agreement, a Supplier now also provides a number of warranties in relation to engaging in modern slavery practices and is subject to a number of obligations with respect to monitoring, reporting and limiting modern slavery practices in its operations.

COVID-19

The COVID-19 pandemic has continued to bring further challenges to modern slavery during FY2021 and highlighted social and economic inequalities worldwide. The Norton Group has continued to assess the impact of COVID-19 pandemic on its practices and risks to modern slavery. While our production did not cease, we took active steps to protect our workers from the effects of COVID-19. We also recognise the impact of the pandemic on our supply chain. We recognised the potential modern slavery risks associated with the increased purchasing of personal protective equipment throughout this period.

Assessing our effectiveness

The Norton Group continues to take the following steps to assess the effectiveness of our actions to address modern slavery:

- reviewing policies annually or as required by legislative change;

- conducting thorough investigations into complaints; and
- conducting policy onsite rollout sessions with employees to support any changes.

In FY2021, we also continued to work toward finalising and documenting our formal process for reviewing the effectiveness of these actions and any future action we take to address modern slavery.

Consultation

As a subsidiary of Norton Gold Fields Pty Ltd, Paddington Gold Pty Ltd's approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across the Norton Group.

Prior to being put to the board of Norton Gold Fields Pty Ltd for review and approval, this statement was reviewed by Paddington Gold Pty Ltd and it was given an opportunity to comment.

FY2022 focus

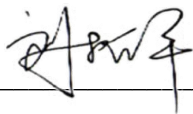
As this is our inaugural statement, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

In FY2022 we will focus on:

- continuing to carry out due diligence on newly engaged suppliers who are identified as having higher modern slavery risk;
- reviewing and refining our existing policies and procedures to ensure that they sufficiently address modern slavery risk in our operations and supplier portfolio;
- finalising and implementing our documented process for reviewing the effectiveness of the actions we take to address modern slavery; and
- developing our employees' understanding of the tools we have implemented to assist with our modern slavery compliance efforts.

This statement was approved by the Board of Norton Gold Fields Pty Ltd in its capacity as principal governing body of Norton Gold Fields Pty Ltd on 14th June 2022.

This statement was signed by Zhaoping Liu in his capacity as Chief Executive Officer and board member of Norton Gold Fields Pty Ltd.



Zhaoping LIU

CEO

Norton Gold Fields Pty Ltd