



stanmore

Joint Modern Slavery Statement 2023



STANMORE RESOURCES LIMITED

Under the Modern Slavery Act 2018 (Cth)
Reporting Period 1 January 2023 – 31 December 2023



1.

Reporting Entity

This Modern Slavery Statement (**Statement**) is made in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) (**Act**). It is a joint statement given by Stanmore Resources Limited ACN 131 920 968 and each of the following reporting entities (which are referred to collectively throughout this statement as **Stanmore, we and our**):

- Stanmore Resources Limited ACN 131 920 968
- Stanmore Bowen Coal Pty Ltd ACN 606 241 847
- Stanmore Wotonga Pty Ltd ACN 606 243 770
- Stanmore IP Coal Pty Ltd ACN 606 244 615
- Stanmore IP South Pty Ltd ACN 625 536 094
- Stanmore SMC Holdings Pty Ltd ACN 653 931 223
- Dampier Coal (Queensland) Proprietary Ltd ACN 008 428 180
- Stanmore SMC Pty Ltd ACN 009 713 875

Stanmore reports under the Act on a calendar-year reporting period. This Statement covers the period from 1 January 2023 to 31 December 2023.

Director's Statement of Board Approval

The Board of Directors (**Board**) of each Stanmore entity includes at least one Director of Stanmore Resources Limited. The entities are centrally governed and managed. The Stanmore entities have a common registered office at Level 32, 12 Creek Street, Brisbane, Queensland.

This Statement was approved by the Board of Stanmore Resources Limited as the principal governing body of Stanmore Resources Limited on 20 June 2024 and is signed by Marcelo Matos, Chief Executive Officer and Executive Director on 21 June 2024.

Marcelo Matos

Chief Executive Officer and Executive Director of Stanmore Resources Limited

21 June 2024



2.

Reporting Entities' Structure, Operations and Supply Chain

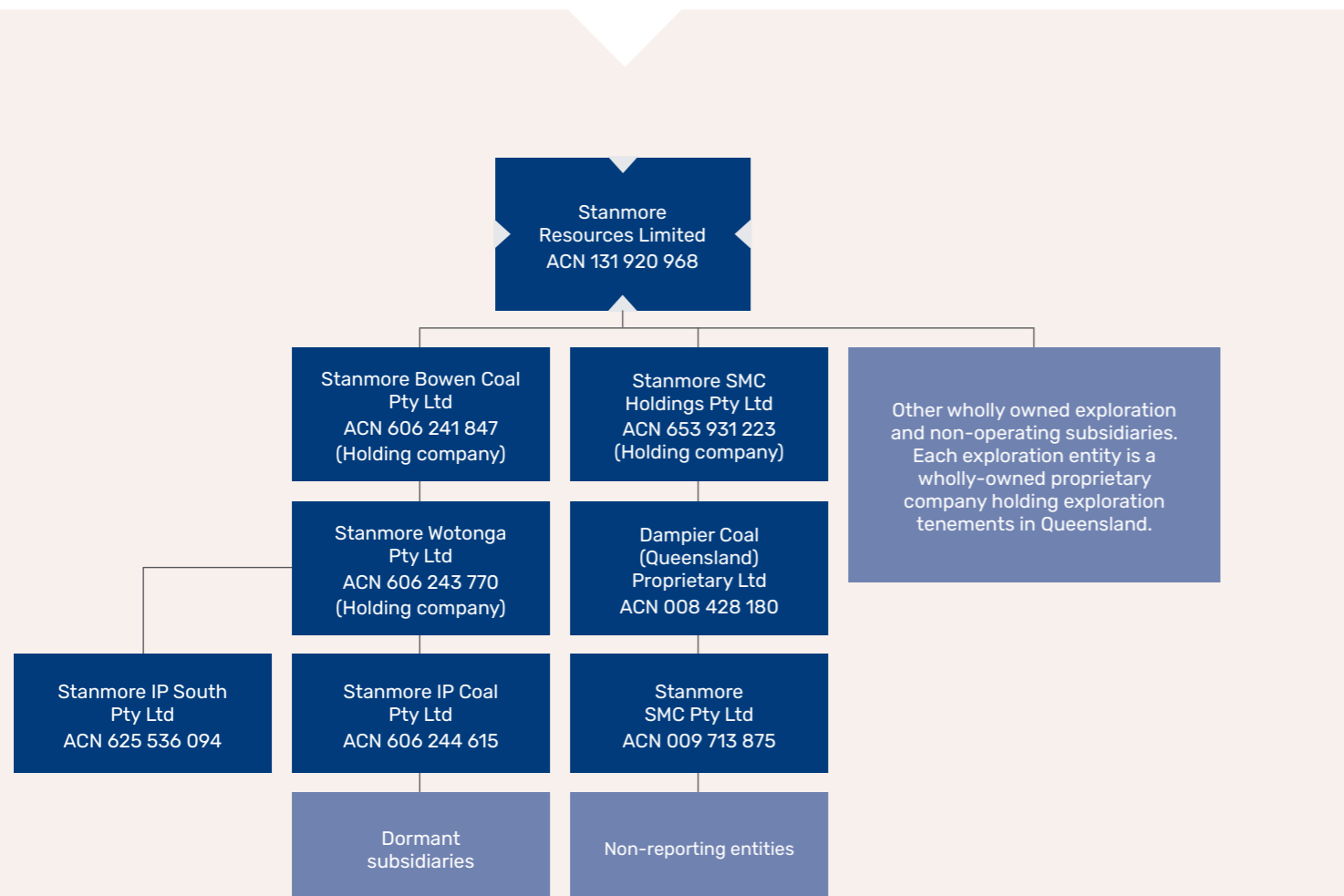
2.1 OUR STRUCTURE

Stanmore is an Australian metallurgical coal mining, development, and exploration company.

Stanmore's majority shareholder is Golden Energy and Resources Pte. Ltd. (GEAR) (formerly Golden Energy and Resources Limited), an investment holding company focused on investment in the resource sector in the Asia Pacific region. GEAR's shareholding in Stanmore is structured through GEAR's wholly-owned subsidiary,

Golden Investments (Australia) Pte. Ltd. Stanmore's ultimate parent company is Star Success Pte Ltd, a company incorporated in the British Virgin Islands. GEAR was previously listed on the Mainboard of the Singapore Exchange but has been voluntarily delisted with effect from 28 September 2023.

During the Reporting Period, Stanmore's primary operating subsidiaries, including incorporation details, are as shown in the figure below:



2.2 OUR OPERATIONS

Stanmore controls and operates the South Walker Creek, Poitrel and Isaac Plains Complex metallurgical mines and the undeveloped Wards Well, Isaac Plains Underground and Isaac Plains South projects in Queensland's prime Bowen Basin region. Stanmore holds additional high-quality prospective coal tenements in Queensland's Bowen and Surat basins. The total product coal produced in 2023 was 13.2 million tonnes.

Stanmore's greenfield tenement portfolio includes the Range, Belview, Lilyvale, Mackenzie, Clifford, New Cambria, and Tennyson. These cover over 2,000km² of prospective areas of the coal bearing Bowen and Surat Basins.

In late December 2023, Stanmore acquired the remaining interest in MetRes Pty Ltd, the incorporated joint venture that owns the Millennium Complex, comprising Millennium and Mavis Downs Mines. As a result, Stanmore now wholly owns and controls MetRes Pty Ltd. MetRes Pty Ltd will submit its own modern slavery statement for 2023 if it meets the \$100 million in annual consolidated revenue threshold specified by the Act. Stanmore will integrate MetRes Pty Ltd into our overall modern slavery framework in 2024 and report on these efforts in our next statement.

Stanmore's total workforce grew to 767 employees by the end of the reporting period, with 760 full-time employees and seven part-time employees. 89% of our staff are based in regional areas (inclusive of our FIFO workers). This overall workforce increase from the previous reporting period (718 total, with 700 full-time employees) reflects the continuing growth in employment opportunities with Stanmore due to the ongoing expansion of our core operations.

In line with industry practice, Stanmore continues to use contracted staff in addition to our team of employees at our mine sites. The ongoing steps described in prior statements to monitor and mitigate known potential risks generally associated with temporary workforces remained in operation during 2023.



2.

Reporting Entities' Structure, Operations and Supply Chain

(CONTINUED)

2.3 OUR SUPPLY CHAINS

From a modern slavery risk perspective, we do not consider there to have been any significant change to our overall supply chain characteristics compared to the last reporting period. Our supply chains continue to be dominated by the core inputs for coal mining (including development and exploration projects) and procurement for our day-to-day business activity.

As in previous Reporting Periods, our direct suppliers continue to be overwhelmingly Australian companies (over 99%).

During the reporting period, we directly engaged 1,147 individual suppliers. Our last statement reported engagement with 651 active direct suppliers.

Rather than any fundamental change in our overall supply chain profile, we primarily attribute this increase in reported overall numbers of direct unique suppliers to several factors, including:

- The South Walker Creek mine site transitioning into an expansion phase during the reporting period, resulting in more construction and engineering suppliers being engaged.
- Continuing to onboard suppliers previously engaged under systems linked to previous ownership onto Stanmore's procurement system.
- We also changed how we categorise procurement expenditure, compile data regarding supplier numbers, and our process for paying invoices. The new method has provided a more granular picture of previously consolidated suppliers based on standard features (e.g., a parent company and subsidiary) to better differentiate between all separate legal entities and promote direct local engagement. This procurement system also requires us to categorise companies as suppliers to facilitate invoice payments, even for companies not typically defined as suppliers.

The following are the types of suppliers that represent our most significant proportional procurement expenditure (including the total percentage of overall annual supplier expenditure):

Extraction services	18.3%
Fuel – diesel	12.8%
Civil services	9.3%
Rail freight	8.4%
Port charges	5.4%
Lease plant & equipment	4.8%

The following key supply chain characteristics continue to be applicable:

- **Mining:** Open pit mining equipment, drilling and blasting contractors, hire and maintenance contractors, fuels, lubricants and explosives suppliers.
- **Exploration activities:** Specialised drilling contractors, geophysical contractors, assay laboratories and consultants.
- **Processing activities:** Grinding media, reagents and shutdown contractors.
- **Delivery/transport:** Coal product transport and logistics for export by rail. The purchasing party contracts with shipping vessels for FOB delivery, not Stanmore.
- **Safety gear and work attire:** Personal protective equipment, including safety glasses, gloves, work boots, hard hats, and high-visibility vests.
- **Corporate/building services:** To maintain our offices, including building maintenance services, cleaning and security.
- **Office consumables:** Including stationery, catering and kitchen consumables.
- **IT and communications technology:** Including computer hardware, software, printers, audio/visual equipment, desk phones and mobile phones.
- **Business travel expenditure:** Including flights and accommodation and associated costs incurred by employees for business travel.
- **Professional services:** Including external engagement of accounting, legal, insurance and environmental consulting services.



“ Our supply chains continue to be dominated by the core inputs for coal mining. ”

3.

Risks of modern slavery practices in the operations and supply chains of the reporting entities



3.1 IDENTIFYING AND ASSESSING POTENTIAL AREAS OF MODERN SLAVERY RISK

Stanmore did not receive any reports or otherwise become aware of any actual or suspected incidences of modern slavery in our supply chains or operations during the reporting period.

We continue to update our modern slavery risk assessment (and our internal response to it) via our longstanding use of a leading external supply chain analytics platform, which provides us with a comprehensive picture of where areas of potentially elevated risk may be most concentrated.

3.2 POTENTIAL AREAS OF ELEVATED SUPPLY CHAIN RISK

This reporting period confirmed the importance of ongoing and updated risk assessment, with two Australian industry categories, Hotel and Restaurant Services and Construction Services, flagged as potentially elevated risk areas for the first time.

Figure 1 is a summary of the industry categories with potentially elevated modern slavery risks based on Stanmore's expenditure in the respective sectors and the risks associated with industry inputs.

As with Stanmore's previous statement, the proprietary external assessment tool identified suppliers once removed as having the highest concentration of potential risk (see **Figure 2**). This primarily reflects that the overwhelming proportion of our direct suppliers are Australian companies, many of which are also reporting entities under the Act.

Individual direct suppliers that were assessed as having potentially elevated risk factors include:

- Several Australian uniform and apparel suppliers.
- Australian gas and petroleum suppliers.

Figure 1: Allocation of Stanmore's modern slavery risk exposure by sector

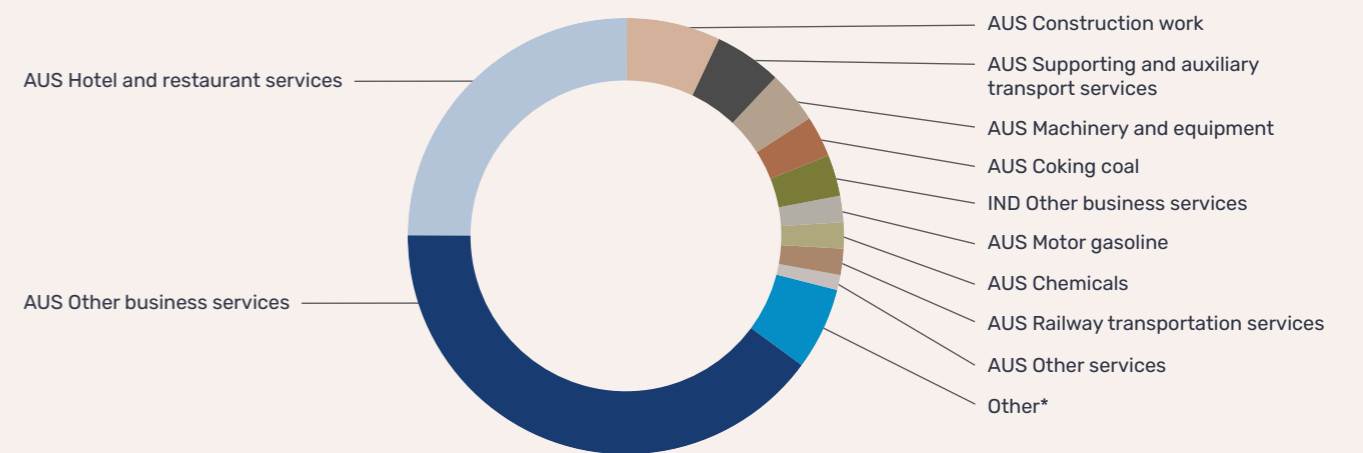
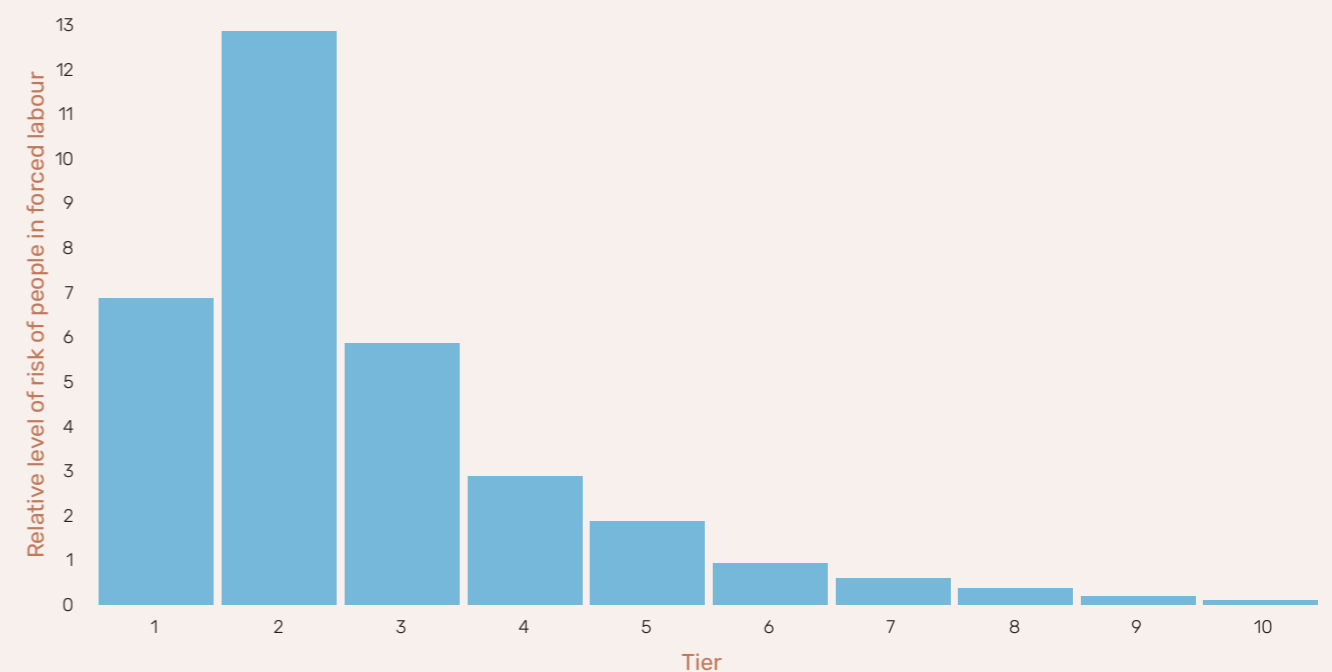


Figure 2: Allocation of Stanmore's modern slavery risk exposure by depth within supply chain (Tier)



3.

Risks of modern slavery practices in the operations and supply chains of the reporting entities (CONTINUED)

3.3 AUSTRALIAN OTHER BUSINESS SERVICES

Stanmore engaged over 300 suppliers in this diverse category, which includes consulting providers, professional services, legal services, accounting providers, environmental consultants, labour recruitment and mining contractor providers, and a variety of mining service providers that are not otherwise classified in the Australian Construction category (e.g. engineering technicians.)

Expenditure in this sector accounts for over half of Stanmore's annual procurement expenditure.

This industry category has potentially elevated risk exposure primarily concentrated deeper within the supply chain. For example, the types of equipment used by suppliers in this sector, including laptop computers and electronic devices for technical mining equipment, feature high-risk supply chain characteristics. These include complex global supply chains with low levels of transparency and a concentration of component manufacturing in high-risk countries, such as Malaysia and China. There is also reliance on high-risk raw materials, such as conflict minerals, which are commonly extracted using child and forced labourers. This confirms that significant aspects of our potential modern slavery risk exposure lie well beyond the first tier of suppliers. For example, the 2023 Global Slavery Index recognised that Chinese and Malaysian electronic products are the highest-risk products imported nationally into Australia.¹

3.4 AUSTRALIAN HOTEL AND RESTAURANT SERVICES

This category includes Stanmore's providers for worker accommodation for mine sites. Identified general characteristics that can lead to potentially elevated risks in this industry include the generally lower-skilled, temporary, and migrant-based workforce commonly employed for servicing facilities.

This can include cleaning providers, maintenance, and security staff. These risks may be potentially elevated because of the remote location of the worker accommodation sites. Accommodation providers also rely on high-risk products such as cotton bed linen and towels.

The accommodation sites also provide worker catering facilities, which rely on products from the higher-risk agriculture and horticultural sectors.² These industries rely heavily on seasonal, low-skilled, and migrant workers, often having job sites in geographically isolated areas and involving hazardous work. There are also issues relating to the misuse of 'piecework' remuneration models, where workers are paid per item harvested. There are multiple identified elevated-risk products imported by G20 countries (according to the 2023 Global Slavery Index)³ commonly used in the commercial food catering sector, including imported seafood, beef, cocoa, and rice.

3.5 AUSTRALIAN CONSTRUCTION SERVICES

The sector ranges from highly skilled professional providers such as civil, mining, and electrical engineering consultants and technical mining service providers to lower-skilled suppliers such as metal fabrication suppliers, haulage service providers, and excavation suppliers. Potential risk areas have been identified at a direct operations level and in relation to a relatively large number of key product supply chains.

The workforce composition for parts of this sector that tend to feature lower-skilled workers may also exhibit other identified risk factors, such as workers on short-term or temporary contracts and sourced via labour-hire companies. These risks are particularly material for individuals who have low English-speaking proficiency, work in remote locations or are reliant upon their employer for working rights in Australia.

The industry category also tends to rely heavily on higher-risk inputs such as conflict minerals, rubber, steel, aluminium, copper, timber, concrete, PVC, and bricks. Mining equipment and heavy construction machinery are often manufactured in higher-risk countries overseas. Given the large number of parts and other critical supply chain inputs, there are generally low levels of supply chain traceability.

The 2023 Global Slavery Index also identifies the Australian construction sector as having a higher risk than other domestic industry sectors. It identifies the following specific risk factors:

- Deceptive practices and burdensome fees incurred throughout the migration process.
- Limited oversight, monitoring and enforcement of worker rights and conditions.
- Relatively high numbers of temporary migrant workers.
- The potential presence of "rogue" labour-hire companies that operate under opaque sub-contracting networks, which may exploit vulnerable workers.
- Australian gas and petroleum suppliers.

3.6 OUR OPERATIONS

Stanmore continues to acknowledge the identification, on a global scale, of potentially elevated modern slavery risks throughout the broader extractive and energy sectors.

As reported in previous statements, Stanmore's area of operation exclusively within Australia significantly reduces the potential risk of modern slavery occurring within direct operations. The publication of a comprehensive update to the Global Slavery Index by the Walk Free Foundation in May 2023, mid-way through the reporting period, confirmed that Australia remains a low risk for modern slavery, with robust legislative and regulatory frameworks acting as a powerful protection and deterrent against all forms of modern slavery. The updated Global Slavery Index did not raise any specific concerns with the coal mining/extractives industry where, as with Stanmore, the entire operational activity occurs in Australia.

Inherent characteristics of the mining sector that have been identified as potentially elevating modern slavery risks include:

- Prevalence of contractors and recruitment outsourcing, including through third-party labour hire agencies.
- Higher incidence of migrant and lower-skilled workers in the workforce compared to other industry sectors.
- Short-term or temporary nature of work requiring non-permanent employment contracts, including temporary and fixed-term contracts.
- Geographically isolated worksites, reducing visibility of workforce conditions and practices, and diminished access to community and protective and support services.

The core roles fulfilled by individuals engaged by Stanmore in contracted positions continue to be primarily a combination of highly skilled professionals (including engineers, mining technicians, and specialised tradespeople) and trained operators and maintainers.

During the reporting period, Stanmore did not engage foreign workers to participate in professional secondment with any of our Australian operations. However, as described in previous statements, when facilitating future secondment arrangements for foreign workers to join our team in Australia, we will continue to ensure that all seconded individuals are treated fairly and receive adequate visa and relocation support.

¹ <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

² <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

³ <https://www.walkfree.org/global-slavery-index/findings/importing-risk/>

4.

Actions taken by the reporting entities to assess and address modern slavery risks

4.1 ADDRESSING POTENTIAL AREAS OF ELEVATED MODERN SLAVERY RISK

In Our Operations

Our employees are all covered by written employment contracts regulated by and subject to Australian labour laws.

We provide employee assistance for expenses associated with settling into local communities near our sites. Stanmore's reimbursement guidelines for remote housing provide staff with security and flexibility by allowing them to be based close to our sites with their families. These guidelines set out the eligibility criteria and conditions on which Stanmore will provide financial compensation for relocation and expenses associated with staff responding to requirements to be present on site.

During the reporting period, Stanmore's Modern Slavery Working Group (**Working Group**) evaluated current governance frameworks to identify areas for continuous improvement in relation to comprehensive protections for our contracted labour workforce. Our long-term external consultants also undertook comprehensive supplier-specific desktop-based due diligence regarding a contracted labour agency that we engage to provide temporary and outsourced labour to our mine sites.

In Our Supply Chains

A highlight of Stanmore's modern slavery response for the reporting period is how we used comprehensive risk assessments as the foundation of our program. We have now performed risk assessments on our supply chains over successive reporting periods and use the data generated as the primary driver for how we focused our due diligence action. We consider this evolution to be a significant and continuing improvement in our approach to addressing modern slavery risk, which we expect will lead to more significant practical insights compared to broader, less specific methods such as issuing high volumes of supplier self-assessment questionnaires regardless of impact.

4.2 DUE DILIGENCE ON PERSONAL PROTECTIVE EQUIPMENT AND UNIFORM SUPPLIERS

At the start of the reporting period, Stanmore selected personal protective equipment (**PPE**) and uniform providers as a focus area due to plans to procure a significant volume of uniforms through a local retailer. Stanmore's objective was proactively integrating modern slavery considerations into our broader pre-purchase decision-making framework.

Initially, Stanmore engaged directly with the local retailer to understand its approach to modern slavery. The retailer is not a reporting entity under the Act, and advised Stanmore that it did not have any anti-slavery mechanisms in place. Instead, it relied on the policies and frameworks used by its suppliers.

Stanmore received details of all major brands supplied by the retailer (relevant to its uniform range) and engaged our external consultants to perform supplier-specific audits on these companies. The desktop audit focused on assessing and comparing the risk exposure and mitigation frameworks of the workwear and footwear brands Stanmore would likely purchase from the retailer.

Three footwear providers and three textile apparel suppliers were examined. The due diligence analysis focused on well-documented risk factors in the textiles and footwear manufacturing industry, including the ongoing impacts of the COVID-19 pandemic on the global garment sector.

Two of the examined workwear apparel suppliers are part of large, multinational organisations and come under the scope of parent company frameworks and due diligence systems. One supplier, in particular, was subject to the sophisticated best practice systems that its parent company had implemented. This includes comprehensive reporting on its initiatives and relatively significant disclosure about how they are practically applied across different business divisions. In contrast, the third company is a very small company and has not, at this stage, devoted significant resources to developing a comprehensive modern slavery strategy.

In relation to the potential footwear suppliers of work and safety boots, two are Australian-owned companies with smaller resources than the multinational owner of the third supplier. However, both Australian-owned companies demonstrated genuine efforts in addressing potentially elevated risks inherent in the industry. One disclosed particularly detailed information on its modern slavery risks, policies, and activities. The prospective supplier with a global parent company has extensive policies and self-reported risk mitigation activities. However, it was not entirely clear, based on the review of publicly available information, the extent to which these international measures are being practically implemented in the specific context of the Australian footwear business.

In addition to ensuring appropriate due diligence was undertaken at the pre-procurement stage, the process also yielded insight into our next steps for future engagement with similar suppliers. This includes asking questions about transparency over manufacturing operations and understanding what steps have been taken to ensure manufacturing partners have proper anti-slavery frameworks in place.

To ensure that our focus on addressing potential areas of modern slavery risk in the area of company uniforms was more holistic, Stanmore also met with its other uniform and PPE retailer to understand its approach to sourcing, which appeared to be relatively robust, with a dedicated ethical sourcing team and operational red flag system. Based on this engagement, Stanmore was satisfied that this supplier appropriately mitigated the risks related to uniform procurement. Indeed, as a practical demonstration of the value of collaborative two-way dialogue in engaging suppliers around the issue of modern slavery risk, Stanmore is considering this supplier as a presenter for upcoming internal education on practically responding to modern slavery risks.

4.3 DUE DILIGENCE ON SUPPLIER OF TYRES FOR SPECIALIST MINE VEHICLES

There are potentially elevated risks associated with sourcing rubber, which is the core supply chain input for producing tyres for use in mining vehicles. The assessed supplier is a subsidiary of a global corporation. The corporate group has manufacturing plants based in higher-risk countries such as India.

The supplier is a reporting entity under the Act and primarily relies on due diligence mechanisms operated by its wider corporate group. The global parent entity has been named in investigative reports alleging supply chain connections to Xinjiang (along with many other 'household' companies and brands pervasive in Australia's day-to-day activities).

Based on our due diligence review, Stanmore has determined that the supplier is sufficiently monitoring and mitigating modern slavery risks, and no further engagement with the supplier is required.

4.4 TARGETED REQUESTS FOR SUPPLIER DISCLOSURE

As noted above, Stanmore, guided by our Working Group, has adopted a due diligence approach that eschews mass distribution of supplier self-assessment questionnaires to large swathes of our supply chain. However, we continue to recognise the value of targeted requests for supplier disclosure when such an approach appears warranted based on the outcome of risk assessments and other due diligence processes.

An example from this reporting period was our engagement with a mining operations explosives supplier, which we became aware had operations in international locations with potentially elevated modern slavery risk. This prompted Stanmore to issue a targeted disclosure request to the supplier seeking details about where the explosives purchased by Stanmore are manufactured. The supplier confirmed that the products purchased by Stanmore are manufactured in its Australian factories (not its foreign factory in a higher-risk region) and that the key product inputs were also sourced from Australian suppliers.

4.

Actions taken by the reporting entities to assess and address modern slavery risks (CONTINUED)

4.5 WORKER ACCOMMODATION

During the reporting period, the Working Group undertook in-house due diligence and supplier engagement with two of its workforce housing and accommodation providers for mine sites, including one new supplier and an existing provider with the highest-value contract.

The Working Group selected this focus area because the Australian hotel and restaurant sector has been identified as potentially a source of elevated risk.

The following is an overview of the in-house assessment and due diligence process for these worker accommodation providers involved:

Existing Provider

The Working Group requested information about the provider's current risk mitigation framework. We determined that the provider has an existing and comprehensive onsite audit process (including external annual auditors) in place for its suppliers of food and catering products. It is a reporting entity under the Act and discloses the results of these audits.

Stanmore has established bi-annual meetings with this supplier, including to discuss further follow-up information about specific aspects of its modern slavery response.

New Supplier

The provider's due diligence system was assessed as having a less developed framework. It is primarily document-based and without any on-site auditing mechanisms. The company is not a reporting entity under the Act.

Our Working Group determined that the most appropriate approach was to periodically engage with the supplier regarding the ongoing development of its modern slavery response framework.

As a result of this due diligence activity, the Working Group expanded its membership to include our site services superintendent to ensure appropriate input and visibility over this aspect of our operational activities.

4.6 MODERN SLAVERY WORKING GROUP

Stanmore's Modern Slavery Working Group has been the primary driving force behind day-to-day modern slavery initiatives during the reporting period. The Working Group met regularly during the year, and its membership includes a cross-section of key departments, including legal, procurement, site management, HR, and business risk.

The Working Group prepares and provides regular updates across the breadth of relevant areas, including monitoring and reporting risks (e.g., updates on regulations and media spotlights, enforcement and accountability, third-party management focusing on risk assessment, and engagement within designated supplier focus areas).

The Working Group also spearheaded a review of existing procurement and contract management systems (as part of Stanmore's general shift in supplier categorisation procedures during the reporting period) and assessed areas including modern slavery considerations. We recognise that there is room for improvement of existing systems to better address potentially elevated areas of risk in a forward-looking manner.

4.7 REMEDIATION AND WORKER GRIEVANCE MECHANISMS – RAISING WORKER AWARENESS

'Speak Up' Report and Triage Form and Accompanying Awareness-raising

In February 2023, Stanmore rolled out our 'Speak Up' Report and Triage Form and accompanying awareness-raising poster campaign.

This mechanism was developed to assist team members with properly documenting certain disclosures from the existing 'Speak Up' whistleblower facility. The form is designed as a checklist to record disclosure details, how the discloser wants the issues resolved, and a 'triage' section that requires the user to identify whether the disclosure amounts to a breach of applicable laws. Modern slavery is included explicitly in this list.

This tool was issued to key internal team members with the description and instructions to promote usability.

The awareness-raising campaign gave our team members practical guidance on what to do and say when someone comes to them with a complaint or concern. It has been designed to assist the recipient of the complaint in showing support while managing expectations during discussions of often sensitive and distressing issues.

4.8 WHISTLEBLOWER MECHANISM AND MODERN SLAVERY AWARENESS RAISING

At the start of the reporting period, Stanmore developed an educational poster to summarise our Whistleblower Policy with simple infographics and links for internal reporting and the external anonymous 24-hour whistleblower line. This poster was accompanied by the modern slavery education poster developed and described in our last statement. We placed the educational posters in common areas at the mine sites, including in bathrooms and other common areas, to ensure they were also clearly visible to suppliers, contractors, and workers who may have been engaged through labour hire agencies.

Stanmore has also updated the supplier area of our website to include an easily accessible link to our 'Speak Up' whistleblower hotline.

4.9 MODERN SLAVERY REMEDIATION FRAMEWORK

As described in our last statement, Stanmore has developed a modern slavery remediation framework.

This framework received formal approval and was published on the staff intranet in January 2024, shortly after the conclusion of the previous reporting period.

The remediation framework provides detailed guidance and step-by-step procedures for responding to modern slavery-related complaints or concerns. It covers investigatory guidance (including strict obligations to report certain matters to law enforcement authorities), the development and implementation of corrective action plans, and applied learnings to mitigate and prevent future impacts of a similar kind. It also provides specific guidance for handling implicated third parties (e.g. a supplier (direct and indirect) against whom a complaint is raised) and practical steps for balancing reporting the privacy and protection of victims with other (sometimes competing) considerations.

5.

Measuring the effectiveness of our modern slavery response

Stanmore considers that an important way of assessing the effectiveness of our modern slavery response is to be transparent in directly comparing the planned future actions identified in last year’s statement with what we have achieved in this reporting period. The following table provides an overview of that comparison. It shows that we have met or exceeded planned action in many areas but still have room for improvement and further progress in others.

Planned Future Action in 2022 MSS	Level of Delivery in Subject Reporting Period
<p>Use of solar panels</p> <p>If, as currently expected, the use of solar panels continues to expand further into Stanmore’s operations at multiple sites, the ongoing monitoring, assessment and mitigation of modern slavery risks relating to all associated solar products will remain a priority area for our Modern Slavery Working Group</p>	<p>While Stanmore did not procure solar panels during the reporting period, solar-related risks were monitored continuously. Our Working Group had regular line items dedicated to assessing media reports regarding solar panels and regular action items devoted to liaising internally to obtain visibility over future procurement pipelines to monitor risk.</p>
<p>Modern Slavery Response Procedure</p> <p>We anticipate operationalising a formal response procedure during the next reporting period. Stanmore intends to provide a more fulsome description of the endorsed Modern Slavery Response Procedure in our next statement.</p>	<p>Stanmore received Board approval for the Modern Slavery Response Procedure (Procedure) in January 2024. The Procedure has now been published on the internal intranet.</p>
<p>People Policy</p> <p>Our Compliance and Human Resources Departments reviewed existing human rights policies to ensure compatibility and consistency with Stanmore’s Modern Slavery Policy.</p> <p>Part of this process has involved preparing a new People Policy, which we consider relevant in modern slavery as a further safeguard against operational risks. We expect to finalise and implement the Policy in the next reporting period.</p>	<p>In 2023, Stanmore commenced a process to complete a ‘refresh’ on various organisational policies. As part of this review process, this policy was dispensed with as part of a broader push to streamline and economise policy frameworks.</p>

Planned Future Action in 2022 MSS	Level of Delivery in Subject Reporting Period
<p>Recruitment policy</p> <p>A periodic update of our Recruitment Policy is also underway and is expected to be finalised and implemented in the next reporting period.</p>	<p>During the reporting period, minor work occurred to update the policy (with matters not relevant to modern slavery), and the policy is currently awaiting approval.</p>
<p>Education material</p> <p>The rollout of our internal modern slavery awareness posters is planned for completion during the next reporting period.</p>	<p>Posters have been rolled out and placed in prominent common areas across sites and staff bathrooms.</p>
<p>Measuring effectiveness – areas for improvement</p> <p>Working more closely with suppliers identified as higher risk through the proprietary risk assessment, including providing training materials, incorporating modern slavery contract clauses, and requiring the completion of supplier self-assessment questionnaires.</p> <p>Following the development of our Modern Slavery Response Procedure, we will increase our monitoring of remedial actions.</p>	<p>During the reporting period, Stanmore engaged more specifically with the proprietary risk assessment at the start of the reporting period to understand what kinds of suppliers to engage with.</p> <p>During the reporting period, this took the form of engaging external experts to perform due diligence assessments on suppliers and meeting directly with suppliers to engage in conversations about approaches to addressing modern slavery.</p> <p>Training Material</p> <p>After reviewing desktop assessment reports and determining that selected high-risk suppliers already had sufficient education programs, the Working Group decided that Stanmore would not issue any additional training material to suppliers.</p> <p>Contract Clauses</p> <p>Stanmore continued to use its modern slavery contract clauses for all new supply agreements during 2023, including references to our Whistleblower Policy.</p> <p>Self-Assessment Questionnaires (SAQs)</p> <p>Stanmore did not issue any SAQs during the reporting period; instead, it focused on desktop assessments and direct engagement with select suppliers to issue specific questions. The Working Group intentionally made this decision based on the low response rate in the prior reporting period.</p>

5.

Measuring the effectiveness of our modern slavery response

(CONTINUED)

Planned Future Action in 2022 MSS

Measuring effectiveness – areas for improvement

Following the development of our Modern Slavery Response Procedure, we will increase our monitoring of remedial actions.

Measuring effectiveness – areas for improvement

Further awareness-raising initiatives for the most vulnerable workforce aspects are in progress.

Measuring effectiveness – areas for improvement

Moving towards human rights-focused due diligence through conducting audits of our operations and reviewing any remedial steps our suppliers may have taken.

Level of Delivery in Subject Reporting Period

The Working Group had a standing agenda item to review any complaints received via its grievance mechanisms and determine suitable remedial action. No complaints were received, requiring review or monitoring.

Education materials and posters have been rolled out using easy-to-understand language. The rollout has focused on placing posters onsite where contracted and labour-hire workers are located and in places such as toilets to promote accessibility.

Stanmore also published its remediation framework and media articles about risks with labour-hire agents on the staff intranet as educational materials.

Members of the Working Group attended a webinar run by Walk Free regarding the release of the new Global Slavery Index and an industry event facilitated by our external consultants in partnership with Walk Free. Both these sessions covered issues relating to migrant workers in the modern slavery context.

Stanmore explored the need to complete an audit on its accommodation providers and decided that it was not warranted, given that the provider had conducted and shared the results of its own comprehensive audit. The Working Group continues to assess risks in Stanmore's operations and identify gaps in the current operational system for future improvement.

Other due diligence focused on desktop assessments. As part of the desktop auditing of select suppliers, Stanmore assessed the adequacy of supplier remediation frameworks.

6.

Consultation with owned and controlled entities and other relevant information

Appropriate consultation occurred with all of Stanmore's owned and controlled entities, both in relation to the preparation of this Statement and for our overall and ongoing modern slavery response.

As detailed above, Stanmore acquired the remaining share of MetRes Pty Ltd in late December 2023. While MetRes Pty Ltd will prepare a separate statement for the 2023 Reporting Period if it reached the mandatory reporting threshold, Stanmore has provided a copy of this statement to MetRes Pty Ltd before its lodgement to foster transparency about our approach to assessing and addressing modern slavery risks.





stanmore.au