

2020

Modern Slavery Statement

Hoya Multiflora
Didipio Mine, Philippines



OCEANA GOLD



Sheila and Joana from
our Didipio Mine, Philippines

**ABOUT
THIS STATEMENT**

Reporting Entities

This is a joint statement by OceanaGold Corporation (ABN 50 124 980 187) (**OceanaGold**) and Oceana Gold Pty Ltd (ABN 56 107 488 200) (**OGPL**) (together the **Reporting Entities**). OceanaGold is the parent company of the OceanaGold Corporation Group and both OceanaGold and OGPL are Reporting Entities under the Modern Slavery Act 2018 (Cth) (**Australian Modern Slavery Act**).

This Statement covers the reporting period from 1 January 2020 to 31 December 2020.

All references in this statement to “we”, “us”, “the Group” and “OceanaGold”, refer to OceanaGold and its subsidiaries as a Group, unless otherwise stated.

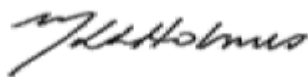
Consultation

The drafting of this Statement was led by OceanaGold’s Responsible Supply Chain Working Group, a cross-functional group including representatives from our operations and offices, across Commercial, Finance, Legal, Compliance and Governance, External Affairs and Social Performance and Health, Safety and Environment.

The Executive Committee (ExCo) of OceanaGold reviewed this Statement prior to it being presented to the Board of OceanaGold Corporation for review and final approval. The ExCo comprises six (6) members including the CEO and Executive Vice Presidents (EVPs) who are functional leads with key responsibility for the day-to-day management of the Group. An additional two (2) Executive General Managers are regionally responsible for operational performance. Our ExCo members include directors of our Reporting Entities and their operating subsidiaries. Accordingly, the ExCo has been used to facilitate consultation between the Reporting Entities and across our controlled entities.

Approval

This Statement was approved by the Board of *OceanaGold Corporation* on 10 June 2021 on behalf of itself and *Oceana Gold Pty Ltd*.



Michael Holmes, President and Chief Executive Officer

Contents

About this statement	2
A message from our CEO	5
Our structure and operations.....	6
Our supply chain	12
Our modern slavery risks	17
Actions to assess and address modern slavery risks	20
Assessing effectiveness.....	25
Looking ahead	26

Mandatory Criteria 1: Identify the reporting entity	About this Statement
Mandatory Criteria 2: Describe the structure, operations and supply chain of the reporting entity	Our structure and operations; Our supply chain
Mandatory Criteria 3: Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Our modern slavery risks
Mandatory Criteria 4: Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Actions to assess and address modern slavery risks
Mandatory Criteria 5: Describe how the reporting entity assesses the effectiveness of such actions	Assessing effectiveness
Mandatory Criteria 6: Describe the process of consultation with any entities that the reporting entity owns or controls	About this Statement
Mandatory Criteria 7: Any other information that the reporting entity considers relevant	A message from our CEO; Looking ahead

A message from our CEO



At OceanaGold our purpose is mining gold for a better future.

The gold, copper and silver we produce help power the global economy, hold important historic and cultural significance and are essential to the renewable energy and transport sectors, life-saving medical devices and technology that connects communities around the world.

Our vision is to be a resilient and dynamic gold miner, trusted to deliver enduring value through innovation, performance and sustainable growth. That vision is brought to life by our company values – respect, one team, contribute and knowledge – that put the safety and wellbeing of our people, communities and environment at the forefront of the decisions we make.

Modern slavery exploits vulnerable people and abuses their basic human rights. It goes against our values and our commitment to respecting the human rights of everyone impacted by our business and throughout our value chain.

This is our first Modern Slavery Statement. It outlines our work during the 2020 calendar year, to better understand our possible exposures to modern slavery risks in our operations and our supply chain. It has been developed by our Responsible Supply Chain Working Group in consultation with external subject matter experts and reviewed by our Executive Committee and approved by the Board of Directors.

Earning the right to operate long into the future means understanding our broader societal impact and working closely with suppliers, communities, governments and global organisations to maintain our high standards and continue to enhance our practices over time.

We recognise that addressing modern slavery risks is complex and the OceanaGold Board of Directors and Executive Committee are committed to developing a framework that will help us better understand potential modern slavery risks in our operations and supply chains and guide us in responding to them.

I look forward to sharing our progress with you in our future statements.

OUR STRUCTURE AND OPERATIONS

OceanaGold is a multinational gold mining and exploration company that has been publicly listed on the Australian Securities Exchange (‘ASX’) and on the Toronto Stock Exchange (‘TSX’) since 27 June 2007.

OceanaGold is incorporated in, and has its registered office address in, Canada. OGPL is incorporated in Australia with its registered office located in Melbourne.

Globally we have 1,703 employees (95.9% permanent employees) and 763 contractors (as at 31 December 2020). Our employees and contractors are based in Australia, Canada, New Zealand, the Philippines, Singapore and the United States.



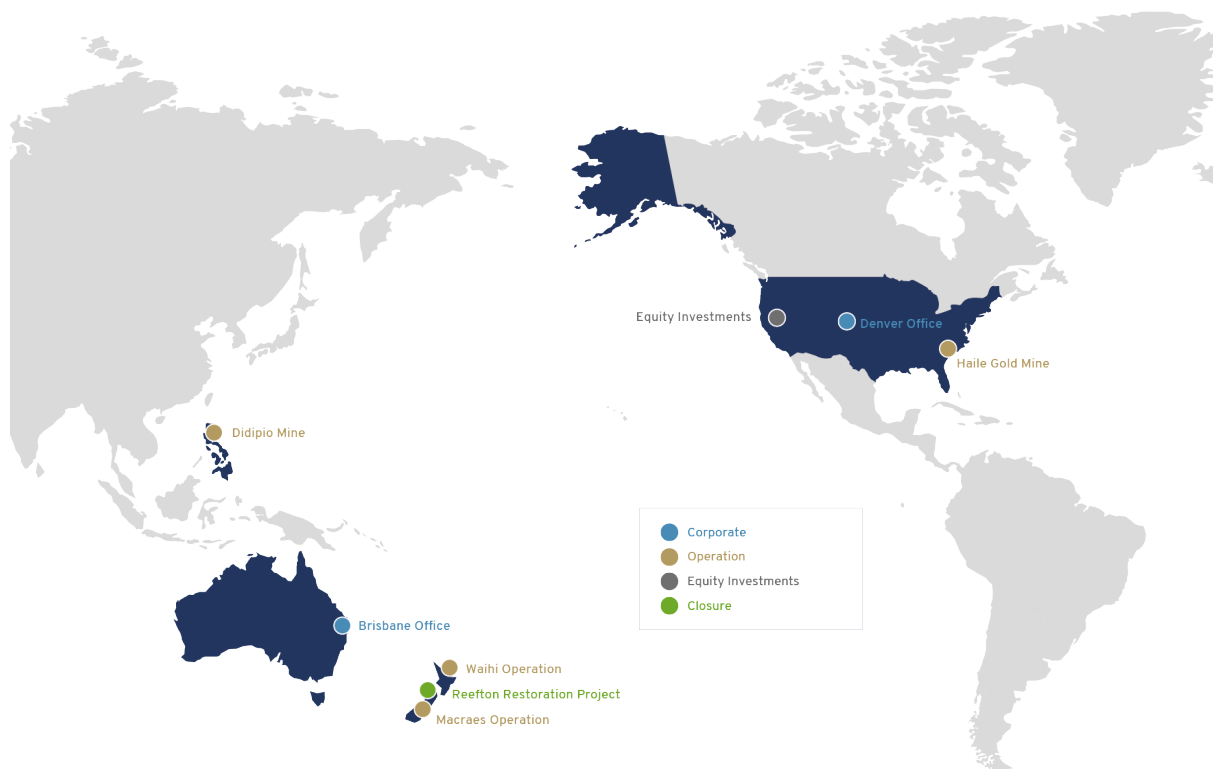


Our structure

OceanaGold Corporation is the parent company of the Group. It has three wholly owned operating entities:

1. Oceana Gold Pty Ltd (OGPL) which is incorporated in Australia and holds the Group's interests and operations in New Zealand;
2. OceanaGold (Singapore) Pte. Ltd. which is incorporated in Singapore and holds the Group's interests and operations in the Philippines;
3. Romarco Minerals Inc. which is incorporated in Canada and holds the Group's interests in the United States.

There are a number of other entities in the OceanaGold Group including management companies, holding companies and subsidiaries. Our Annual Information Form on our website provides a full breakdown of the company's structure.



Our operations

Our core operations involve the exploration, development, extraction and processing of gold, copper and silver. We own and operate open pit and underground mines, the ore from which is processed at our on-site processing plants to produce gold and silver doré bars that are transported to refiners and then sold. The Didipio Mine also produces copper concentrate that is subject to an offtake agreement.

Our operations are supported by on-site Geology, Health & Safety, Environmental, People & Culture, Legal, External Affairs and Social Performance, Information Technology (IT) and Commercial teams who manage procurement. Our corporate offices in Australia provide governance over these support functions as well as distribution and sales, with our regional offices providing localised legal, finance and IT support.

We currently have four operating assets, through which we contribute to economic growth, employment and skills development, and community and environmental partnerships:

	Didipio Mine*	Macraes Operation	Waihi Operation	Haile Gold Mine
Mine type	Gold and copper mine	Gold mine	Gold mine	Gold mine
Location	Luzon Island, Philippines	South Island, New Zealand	North Island, New Zealand	South Carolina, United States of America
Employees**	189	609	291	527
Operation type	Underground operation producing gold and silver as doré bars and copper in concentrate	Open pit and underground operation producing mainly gold as doré bars	Underground operation producing gold and silver as doré bars	Open pit operation producing mainly gold as doré bars

**Mining was temporarily suspended at the Didipio Mine in 2019 and there was no production in 2020.*

*** As at December 2020*

Didipio Mine



Macraes Operation



Waihi Operation



Haile Gold Mine



Our other investments and projects

OceanaGold's operations also include a number of investments and development projects outside of our core assets. This includes participation in joint ventures and minor interests in other listed companies.

Our portfolio of investments and projects includes:

- Minor interests in NuLegacy and TDG Gold Corp publicly listed gold exploration companies conducting exploration activities in Canada and Nevada; and
- Participation in unincorporated joint ventures in New Zealand (Sam's Creek joint venture, Blackwater Mining Permit) and Australia (Junction Reefs joint venture).

OceanaGold also has interests in several inactive or discontinued projects, including in New Zealand.

Our projects during 2020 included two mine closures; the Reefton Restoration Project (New Zealand) and Junction Reefs (Australia).

During 2020, OceanaGold exited an investment in the Gold Standard Ventures Corp (a publicly listed gold exploration company based in Nevada) and its interests in joint venture arrangements with Bravada Gold Corporation and Renaissance Gold Inc (in Nevada) and Rio de Oro (in Argentina).

Further information in relation to OceanaGold's portfolio is contained in our 2020 Annual Information Form, available on our website.



Former Globe Progress Mine, now known as the Reefton Restoration Project, New Zealand

OUR SUPPLY CHAIN

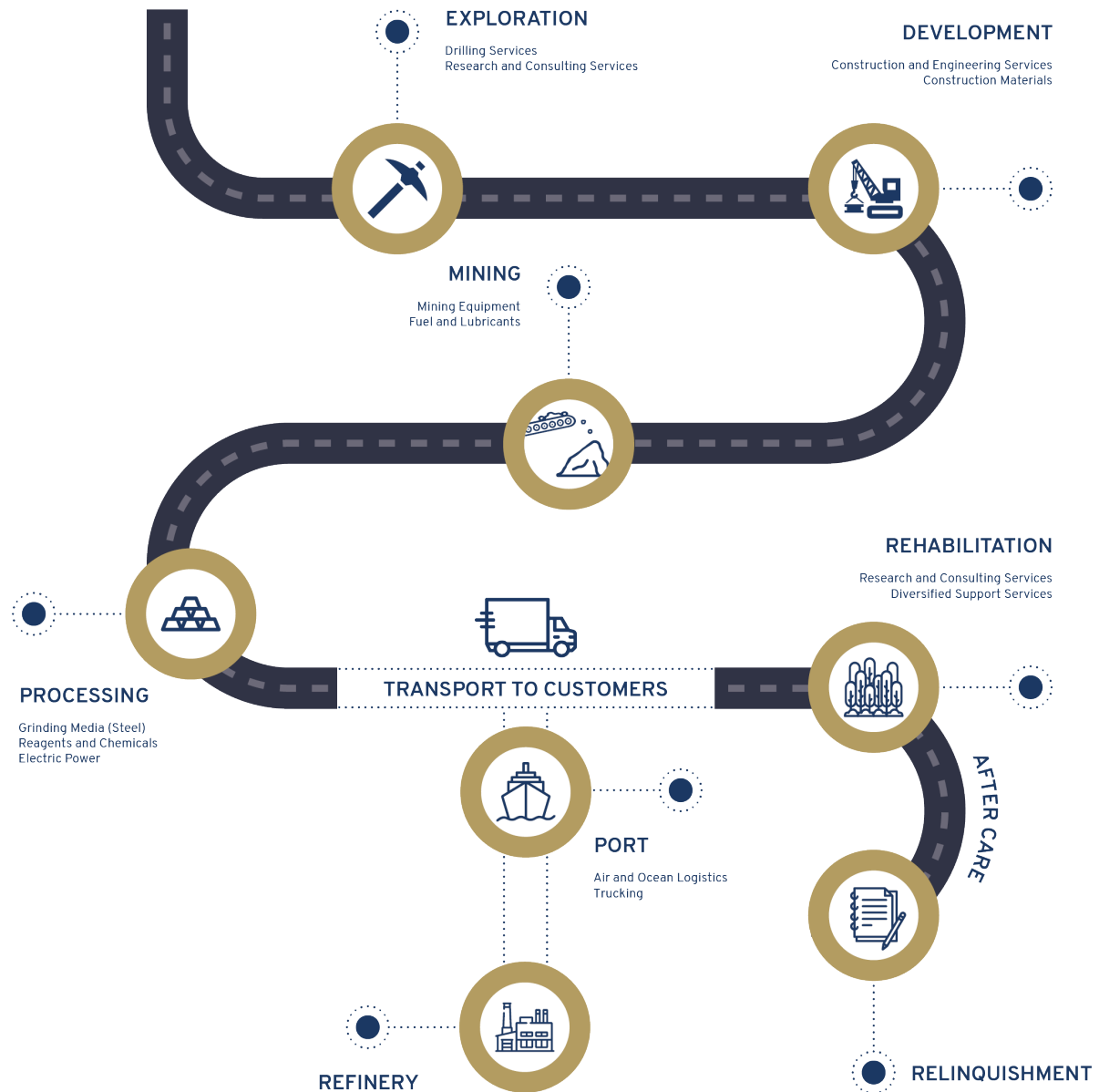
At OceanaGold, we require a range of goods and services to support our lifecycle, from exploration, to delivery to our customers and rehabilitation of our mine sites. Examples of key goods and services required at each stage of our operations are set out in our supply chain roadmap.



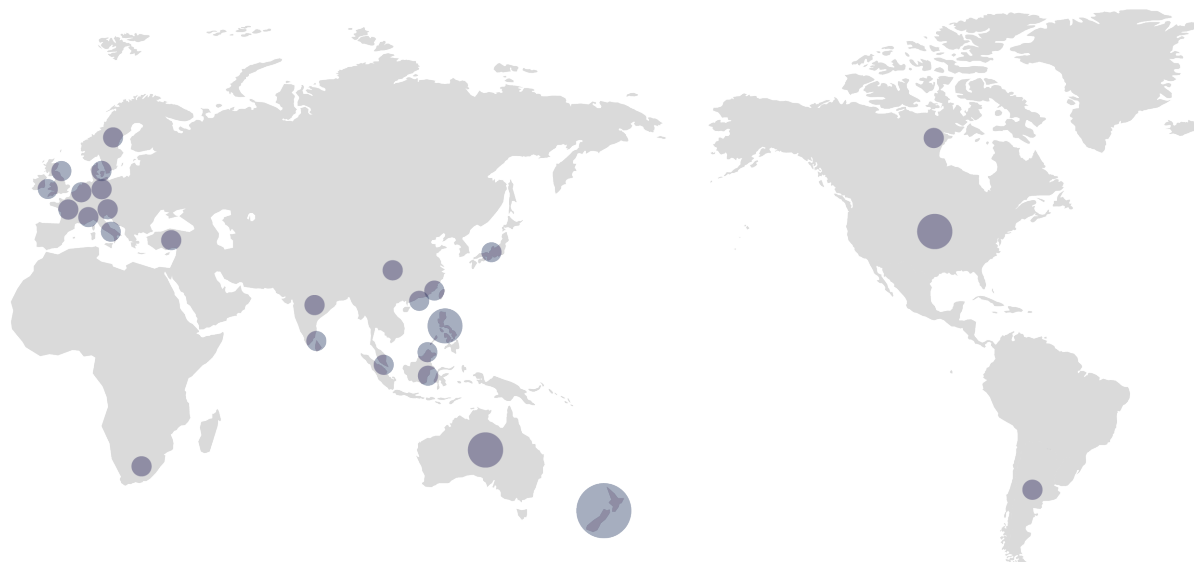


Our supply chain roadmap

The below infographic outlines the principal elements of the mining life cycle in relation to our supply chain.



Set out below is a snapshot of our tier 1 supply chain based on 2020 supplier data.¹ Each operation mapped their suppliers based on business criticality, spend, location and industry (by the Global Industry Classification Standard (GICS) code). These indicators were selected as they could also inform our understanding of potential modern slavery risks in our supply chain and give an indication of potential influence over suppliers and switching costs.



Bubble size reflects number of suppliers.

OceanaGold's largest categories of spend by product are:²

- Capital Goods (42%) – including construction materials and mining equipment;
- Materials (13%) – including steel, reagents and chemicals;
- Commercial and professional services (9%) – including consultants and maintenance services; and
- Public order, safety & regulatory (7%) - including tax agencies and royalty beneficiaries.

OceanaGold's key regions for supply are:

- New Zealand (932 suppliers)
- Philippines (528 suppliers)
- United States (515 suppliers)
- Australia (428 suppliers)



71%

Approximate corporate spend in Australia



2500³

Approximate number of suppliers



Suppliers in
27

Countries

¹ Period to 30 September 2020. There were no material changes to the nature of our operations between the time of collecting this data and approval of this Statement.

² Based on analysis of our tier 1 supply chain undertaken in conjunction with EY for the period 1 January – 30 September 2020.

³ Supplier data relating to employee reimbursements and Waihi Amenity Effects Program (AEP) payments was excluded.

Procurement of goods and services at OceanaGold is predominantly decentralised to operationally-based Commercial teams, with support from Legal. These teams are accountable for operational procurement activities, however, some minor procurement activities are also conducted through our corporate offices.

We have agreements with 763 contractors (as at 31 December 2020). Contractors are engaged at each of our operating locations to perform work including maintenance services, construction, assays and other operational support.

During 2020, the COVID-19 pandemic resulted in some impacts to our usual supply chain. The pandemic's impacts on global trade and border closures resulted in extended lead times, labour supply shortages and the need to source alternate products from new suppliers. We recognise that COVID-19 has heightened human rights risks, including modern slavery, in our supply chain. In particular, ocean freight (shipping) and personal protective equipment (PPE) suppliers have been identified as two higher risk procurement categories as noted in our industry risks section. Our response to these risks is being considered as part of the development of our Responsible Supply Chain Management framework discussed in our responsible supply chain management section.

More information about the impacts of COVID-19 on our company, and how we responded to the global pandemic, is available in our 2020 Sustainability Report on our website.



Haul truck at our Macraes Operation, New Zealand.

Our modern slavery risks

We acknowledge that there are risks of modern slavery in our operations and supply chain. In identifying our potential risks, we have used the framework outlined in the United Nations (UN) Guiding Principles on Business and Human Rights to consider how the Reporting Entities could “cause”, “contribute to” and “be directly linked” to modern slavery practices.

To better understand our risks relating to modern slavery we have:

- Conducted a risk assessment of our supply chain (discussed further in this section); and
- Conducted or commenced Human Rights Impacts Assessments at each of our operations (discussed further in our operational risk assessment section).

Risks in our operations

We recognise that by virtue of the nature of our business and the jurisdictions in which we conduct our business, our operations are potentially exposed to modern slavery. We have given consideration to our operations and conducted an assessment of where inherent risks (potential risks if no controls were in place) could arise. We acknowledge that these include:

- Employees/labour – a risk of “causing” modern slavery if we place any of our employees or temporary workers in exploitative situations. We understand this risk is heightened where we have employees in countries with higher modern slavery risks, in particular the Philippines.
- Community – a risk of “contributing” or being “directly linked” to modern slavery if our workforce causes or contributes to modern slavery in the community (for example, if workers at one of our sites use exploited domestic workers). This risk is heightened where we operate in countries with higher modern slavery risks, in particular the Philippines.
- Investments – a risk of being “directly linked” to modern slavery through our investments if our investees are involved in modern slavery.

Risks in our supply chain

We consider that our most significant areas of potential risk for exposure to modern slavery practices is being indirectly linked to it through our supplier relationships.

To better understand the potential modern slavery and broader Environmental, Social and Corporate Governance (ESG) risks in our supply chain, in 2021 we engaged Ernst & Young (EY) to support us in an inherent risk assessment of our 2020 tier 1 suppliers. The assessment considered potential risks if no controls were in place and leveraged publicly available indexes and information to assess country, industry and controversy risk, which uses a media and literature review over the past 10 years to assess the significance and number of instances of controversial events in an industry. The analysis assessed 36 risk factors in relation to 20 ESG risks.

The modern slavery risks considered were: forced labour (including debt bondage); child labour; human trafficking; and forced marriage. Each supplier received an inherent risk score which was classified as low, medium-low, medium, or high in relation to modern slavery risk.

The majority of OceanaGold's suppliers were assessed to have a medium-low or low inherent risk.

~11%, or 261 suppliers, were assessed as having an inherently high risk, with the majority of these suppliers located in the Philippines.

4 of 5 of the highest inherent risk suppliers are providers of diversified support services (i.e. cleaning, maintenance etc.).

Industry risks

We recognise that we engage with a number of high-risk industries as a result of the nature of our business. The inherent risk assessment, supplemented by further input from OGC identified that the highest modern slavery risk supplier industries that we source from include:



Consumer Electronics



Construction and Engineering



Diversified Support Services



Diversified Metals and Mining



Construction Materials



Data Processing and Outsourced Services



Electrical Components and Equipment



Trading Companies and Distributors



Food Retail



Technology Hardware, Storage and Peripherals



Apparel Retail (PPE)*



Freight Forwarding and Shipping*

** risk lies predominantly beyond our tier 1 supply chain*

The heightened inherent risk across the above industries is due to various risk factors including:

- Low skill level required to perform work;
- High prevalence of migrant labour;
- The presence of opaque intermediaries; and
- Low levels of regulation within the industries.

Country risks

As part of the inherent risk assessment, the following countries were identified through independent sources⁴ as the highest risk countries for modern slavery within our tier 1 supply chain. These were:

- Argentina (2 suppliers)
- China (25 suppliers)
- Indonesia (1 supplier)
- India (3 suppliers)
- Philippines (528 suppliers)
- Singapore (23 suppliers)
- Turkey (1 supplier).



We recognise that international organisations like the International Labour Organization and Global Slavery Index⁵ have flagged the Philippines as having higher risks of forced and child labour. The Philippines is a priority for understanding our overall residual risk (the risk after controls have been implemented) within our supply chain.

⁴ Human rights databases, indexes and reports from internationally recognised bodies, including the Global Rights Index, the International Labour Organization, and the World Bank.

Actions to assess and address modern slavery risks

Our approach to assessing and addressing modern slavery risks is incorporated within our broader responsible mining programs, in particular our:

- Human Rights Impact Assessment (HRIA) program, led by the External Affairs and Social Performance function; and
- Responsible Supply Chain Management (RSCM) program, led by a cross-functional working group and sponsored by an Executive Steering Committee.

Governance and policies

The below infographic sets out our human rights governance structure:



In 2019, we launched the External Affairs and Social Performance (EA&SP) Management System which governs how we understand and manage our impacts on local communities and society at large. More information on our EA&SP management system is available on our [website](#) and in our [Sustainability Report](#).

Our [Statement of Business Ethics and Code of Conduct](#) sets an expectation that all OceanaGold representatives including directors, officers and employees conduct all activities to high ethical standards, and states that the company requires the same high standards from contractors, suppliers and business partners.

Our [Human Rights Policy](#) and Human Rights Performance Standard form part of the EA&SP Management System. The Human Rights Policy expresses our commitment to respecting human rights, in line with the UN Guiding Principles, UN Declaration of Human Rights and other international frameworks. This includes taking steps to identify and mitigate human rights risks, ensuring relevant staff receive appropriate training and consulting and communicating about our human rights impacts. The policy also includes a commitment to establish grievance mechanisms and provide access to remedy for adverse impacts. Our human rights performance standard requires each operation to identify and mitigate adverse human rights risks, including through HRIAs as discussed in the next section.

As noted previously, our sourcing of goods and services is predominantly decentralised. Our Group-wide Procurement Standard provides minimum requirements in relation to procurement processes. Site-based Commercial teams, with support from Legal, are required to establish local procedures which meet the Group's minimum standards. These minimum requirements include that a supplier confirms a strong commitment to health and safety and compliance with applicable laws.

Our [Fair Employment Policy](#) sets out our commitment to provide fair employment and workplace conditions, including compliance with all applicable workplace and employment laws as a minimum. It also strictly prohibits the use of forced, compulsory or child labour.

Our [Government and Civil Society Policy](#) recognises the importance civil society organisations play in supporting and advocating for responsible business and improvements in the wellbeing of people and the planet. It sets out our support for the existence of an open civic space and commitment to work with civil society organisations in a variety of ways. It also sets out our commitment to partnerships across sectors to address complex challenges – of which modern slavery is an example.

Our policy commitments also help us meet our commitments to external initiatives, including the World Gold Council's Responsible Gold Mining Principles, through which we are committed to producing conflict-free gold. The Philippines is our operating jurisdiction with the highest potential for conflict minerals extraction, and we are undertaking an assessment of our Didipio Mine to mitigate any potential risk of contributing to conflict minerals extraction.

In 2018, we joined the United Nations Global Compact, and since the end of the reporting period we commenced participating in the Global Compact Network Australia's Modern Slavery Community of Practice, which provides a forum for sharing experiences with and learning from peers and experts.

As part of developing our RSCM framework we will review if our governance policies need to be enhanced to incorporate modern slavery requirements.

Operational risk assessment

Our HRIAs identify how our activities may cause adverse human rights impacts or contribute to the advancement of human rights. We are working with an independent consultant with expertise in business and human rights to undertake HRIAs across our core operations. An initial step in the HRIA process was to identify OceanaGold's salient human rights issues at the Group level – that is, those human rights that are at risk of the most severe adverse impacts as a result of our activities or business relationships. Our assessment considered all internationally recognised human rights – including the right to freedom from slavery – and risks to all stakeholders including our employees, contractors, supply chain workers and communities, and other key stakeholders. Guided by the UN Guiding Principles on Business and Human Rights, this process considered the scale, scope, and an adverse impact's ability to be remediated if it were to occur to determine each impact's severity, as well as its likelihood.

The HRIA process then assesses the actual and potential human rights risks of each of our operations. This is done through desktop review of documentation, interviews and focus groups with rightsholders and stakeholders which may include OceanaGold and vendor employees, management, contractors, community groups, government agencies and civil society.

Once an HRIA is complete, the External Affairs and Social Performance teams lead a review of any identified gaps and agree actions to address these. In 2020, OceanaGold established a corporate KPI to track implementation of the actions to close the gaps identified in the HRIAs.

The status of our HRIAs at our core operations:

- Didipio Mine – HRIA completed in 2018 – 2019. In 2020 further research on human rights relating to land access was conducted. Full implementation of the relevant action plan has been delayed due to the operational suspension of the Didipio Mine.
- Haile Gold Mine – HRIA completed in 2020.
- Macraes and Waihi Operations – a New Zealand-wide HRIA is ongoing and due to be completed in 2021.

There have not been any specific modern slavery issues identified in any of the operational HRIAs.



Marj (Communications and External Affairs Superintendent) and Neri (Community Relations and Development Manager) from our Didipio Mine.

Responsible supply chain management

In 2020, we commenced the development of a Responsible Supply Chain Management (RSCM) framework, designed to address a range of third-party risks, including modern slavery. This is a long-term program of work, with a focus on practical implementation and effectiveness. It built on work in 2019 which involved a benchmarking analysis of peer companies' approaches and a high-level review of existing policies.

Development of our RSCM approach is governed by an Executive-led Steering Committee and lead by a working group including representatives from our operations and corporate offices, across a range of functions including Commercial and Legal. We are also working with external industry and subject matter experts to support our RSCM approach and the development of our program so that we consider leading practice in our design.

During 2020, our work included:

- Reviewing our existing governance, procurement and supply chain controls to identify opportunities to enhance our approach;
- Establishing a workplan for developing the RSCM framework; and
- Conducting an initial analysis of the suppliers to our United States and Philippines operations to determine spend, business criticality, supplier location and industry classification (2020 suppliers to our other operations were analysed in 2021 with findings incorporated into our analyses of supply chain and risk in this statement).

Third parties

In addition to suppliers, we have policies and processes in place to assess risks relating to investments and joint ventures. This includes due diligence on potential partners, consideration of geographic risk and active engagement with our portfolio companies and joint venture partners.

Our Sponsorship and Donation program supports organisations and initiatives that benefit our local communities and our commitment to be a good neighbour. We recognise that it could, however, be a source of potential modern slavery risk. Before we make a sponsorship or donation, we conduct an initial risk assessment, including consideration of modern slavery risk, and undertake further investigation if red flags are identified.

We have a performance standard in place outlining the requirements and approvals for all sponsorships and donations across the company. That standard is available on our website in our External Affairs and Social Performance Manual.

Training

Our employees are key to identifying and addressing the risks of modern slavery and our training programs are designed to equip our teams with the knowledge, tools and skills to understand what human rights and modern slavery are.

In 2019 and 2020, our Board, senior management and employees in key roles across the business completed our *Foundational Training on Business and Human Rights*, delivered by expert external advisors. It included an introduction to human rights, modern slavery and OceanaGold's potential human rights risks. This training provides a base level knowledge for our people to build upon as OceanaGold becomes more mature in its approach to managing and understanding human rights and modern slavery.

In 2020, we developed an online training module to assist employees in understanding human rights including modern slavery. In 2021, this training will be rolled out to all employees in a senior leadership role or with external-facing responsibilities across the company.

Grievance mechanisms and remedy

Through our Human Rights Policy and Standard, we commit to providing effective grievance mechanisms and will provide for, or cooperate in, remediation where we identify that we have caused or contributed to adverse human rights impacts including modern slavery.

We provide a number of mechanisms for employees, contractors and third parties to raise grievances, which include human rights issues.

Our independent and confidential whistleblower service (online and by phone) is available for employees, contractors and external stakeholders (including suppliers and their employees and contractors) to raise concerns including illegal and unethical conduct and serious breaches of our policies, which would include instances of modern slavery. Concerns can also be reported in person or by email to OceanaGold employees nominated as Whistleblower Protection Officers. Additional information on these services is available in our [Speak Up Policy](#) and on our [corporate governance](#) webpage.

We also have complaints and grievance mechanisms at each operation to record, monitor and respond to community enquiries, complaints and grievances and take corrective action as required. They have been developed in accordance with the effectiveness criteria for non-judicial grievance mechanisms in the UN Guiding Principles on Business and Human Rights.

We report annually on the number of notifications through our whistleblower service and our operational grievance mechanisms in our Sustainability Report, available on our website.

Assessing effectiveness

During our first reporting period under the Australian Modern Slavery Act, we have been focused on establishing internal governance for modern slavery, building an understanding of our modern slavery risks, internal engagement and establishing a workplan to develop our RSCM framework.

Our key performance indicator (KPI) relating to human rights is the implementation of the actions to close the gaps identified in the HRIAs. This KPI was established during 2020.

We are committed to continuous improvement in our modern slavery approach and understand that assessing the effectiveness of our actions is fundamental to this. We aim to strengthen this aspect of our work through:

- Tracking the rates of completion for our human rights training, and assessing feedback from participants;
- Monitoring and reviewing complaints received through our grievance mechanisms to identify opportunities to strengthen our approach; and
- Engaging with external stakeholders to seek feedback on our developing modern slavery approach and this Statement.

In 2020, we completed an audit of our operational grievance mechanisms to assess their effectiveness in managing human rights issues. There were no registered complaints relating to modern slavery in 2020.



Steph and Megan at our Reefton Restoration Project in New Zealand.

Looking ahead

We recognise that addressing potential modern slavery risks is complex and we are in the early stages of our work. We are committed to continuously improving our approach.

During 2021, we will do the following:

- Complete and finalise the inherent risk assessments of our tier 1 suppliers;
- Complete a residual risk assessment on a sample of 55 suppliers identified as having potentially high or medium inherent risk for modern slavery;
- Continue to develop and work towards implementation of a new RSCM framework which will include enhancement of OceanaGold policies, codes and practices;
- Continue with our human rights training program; and
- Complete the HRIA covering our New Zealand operations.



Core sample analysis at our Waihi Operation in New Zealand.



Darla, Charlotte and Cassie conducting water monitoring activities at our Waihi Operation's Silt Pond



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