



Disclosure Notes

This Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) for the period 1 July 2019 to 30 June 2020. This is a joint statement made on behalf of the following entities, which we have determined are reporting entities under the Modern Slavery Act:

- Newcrest Mining Limited (ACN 005 683 625), the group's parent company.
- Newcrest Operations Limited (ACN 009 221 505), which holds a 30% interest in the Telfer mine (a joint venture with Newcrest Mining Limited) and interests in a number of exploration tenements throughout Australia.
- Cadia Holdings Pty Limited (ACN 062 648 006), which owns and operates the Cadia Valley Mine.
- Lihir Gold Limited (ARBN 069 803 998), owner and operator of the gold mine located on Lihir Island in the New Ireland province of Papua New Guinea (PNG). Its registered office is in PNG.
- Newcrest International Pty Ltd (ACN 007 449 194), the holding company for Newcrest's 50% interest in Wafi-Golpu (a joint venture with Harmony Gold Mining Company Limited), Newcrest Red Chris Mining Ltd (which holds Newcrest's 70% interest in, and operates, Red Chris Mine, a joint venture with Imperial Metals), Newcrest (Fiji) Pte Limited (which holds Newcrest's 70.75% interest in, and operates, the Namosi Joint Venture, a joint venture with Mitsubishi Materials Corporation and Nittetsu Mining Co. Ltd) and other subsidiaries in Canada, Fiji and Singapore, one of which is undertaking exploration in Fiji and others which hold investments in exploration and development projects in various countries.
- This Statement has not been externally assured.

This Statement describes the steps taken by Newcrest Mining Limited and its owned and controlled entities (**Newcrest** or the **Group**), including the reporting entities above, to assess and address Newcrest's modern slavery risks. Unless expressly stated otherwise, references to 'we', 'us' and 'our' refer to the Group as a whole including the reporting entities listed above. This Statement does not extend to non-managed sites unless expressly stated.

In March 2020, Newcrest completed the sale of its 75% interest in PT Nusa Halmahera Minerals ('PT NHM'), which operates the Gosowong mine (Gosowong) in Indonesia, and 100% of PT Puncakbaru Jayatama ('PT PJ'), which employs exploration personnel in Indonesia. This Statement includes PTNHM prior to completion of the sale as part of the discussion of majority owned and managed assets.

This Statement was approved by the Board of Newcrest Mining Limited on 4 December 2020 on behalf of itself and the other reporting entities listed above and has been signed by the Chairman and CEO (page 3).

Contents

03	Introduction	15	Consultation with owned and controlled entities
04	Our structure, operations and supply chain	16	Engagement and collaboration
07	Our modern slavery risks	17	Looking forward
08	Our approach to assessing and addressing our modern slavery risks	18	Approval/sign off statement
13	Assessing the effectiveness of our approach		



Message from the Chair and Managing Director & Chief Executive Officer

Our vision is to be the Miner of Choice™ for all of our stakeholders, including our people, shareholders, host communities, partners and suppliers.

Respecting human rights, including tackling modern slavery which involves situations of severe exploitation, is an integral part of achieving that vision. It is also fundamental to living our values, including caring about people.

This is our first Modern Slavery Statement under the *Modern Slavery Act 2018* (Cth) (*Modern Slavery Act* or *MSA*). We welcome the opportunity to share the steps we have taken during FY20 to assess and address our modern slavery risks and set out our priorities for the coming year.

We are pleased with the progress we have made over the last year, but also recognise that the challenge of eliminating modern slavery is significant, and we are committed to continuously strengthening our approach.

This Statement has been approved by the Board of Newcrest Mining Limited.

- Key actions during FY20
 - Establishment and formalisation of a cross-functional Modern Slavery Steering Committee focused on strengthening our approach to assessing and addressing our modern slavery risks and reporting under the Modern Slavery Act
 - Modern slavery risk assessment to identify key modern slavery risks in our operations and supply chain
 - Modern slavery gap analysis to assess opportunities for strengthening current policies and processes to better assess and address our modern slavery risks
 - Continued implementation of our Supplier Risk Framework including additional due diligence on high risk suppliers



Peter Hay
Chairman



Sandeep Biswas
Managing Director and
Chief Executive Officer

4 December 2020

▼ OUR VALUES



Caring about people



Integrity and honesty



Innovation and problem solving



High-performance



Working together



Our structure, operations and supply chain

MSA Mandatory Criteria 1 & 2

Newcrest Mining Limited is one of the world's largest gold mining companies.

Our business, structure and operations

Newcrest Mining Limited is headquartered in Melbourne, Australia and is one of the world's largest gold mining companies. We are listed in the top 20 companies on the Australian Securities Exchange (ASX), and we are also listed on PNG's national stock exchange, PNGX.

Newcrest owns and operates a portfolio of, in aggregate, low cost, predominantly long-life mines and a strong pipeline of brownfield and greenfield exploration projects. We produce gold dore which is sold to gold refineries in Australia, and mineral concentrates which are exported to smelters located predominantly in Asia.

Newcrest has a number of owned and controlled entities, including those that hold our operating mines and investments, and those that provide various services to the Group.

Our operating mines are as follows:

- Cadia (Australia) (100% owned and operated)
- Telfer (Australia) (100% owned and operated)
- Lihir (PNG) (100% owned and operated)
- Red Chris (Canada) (70% owned and operated)
- We also held a 75% interest in the Gosowong mine (Indonesia) for part of the reporting year.

We also have a number of development projects and are exploring around the globe. These include wholly or majority-owned and managed exploration projects in Australia, Canada, Fiji, PNG and Ecuador.

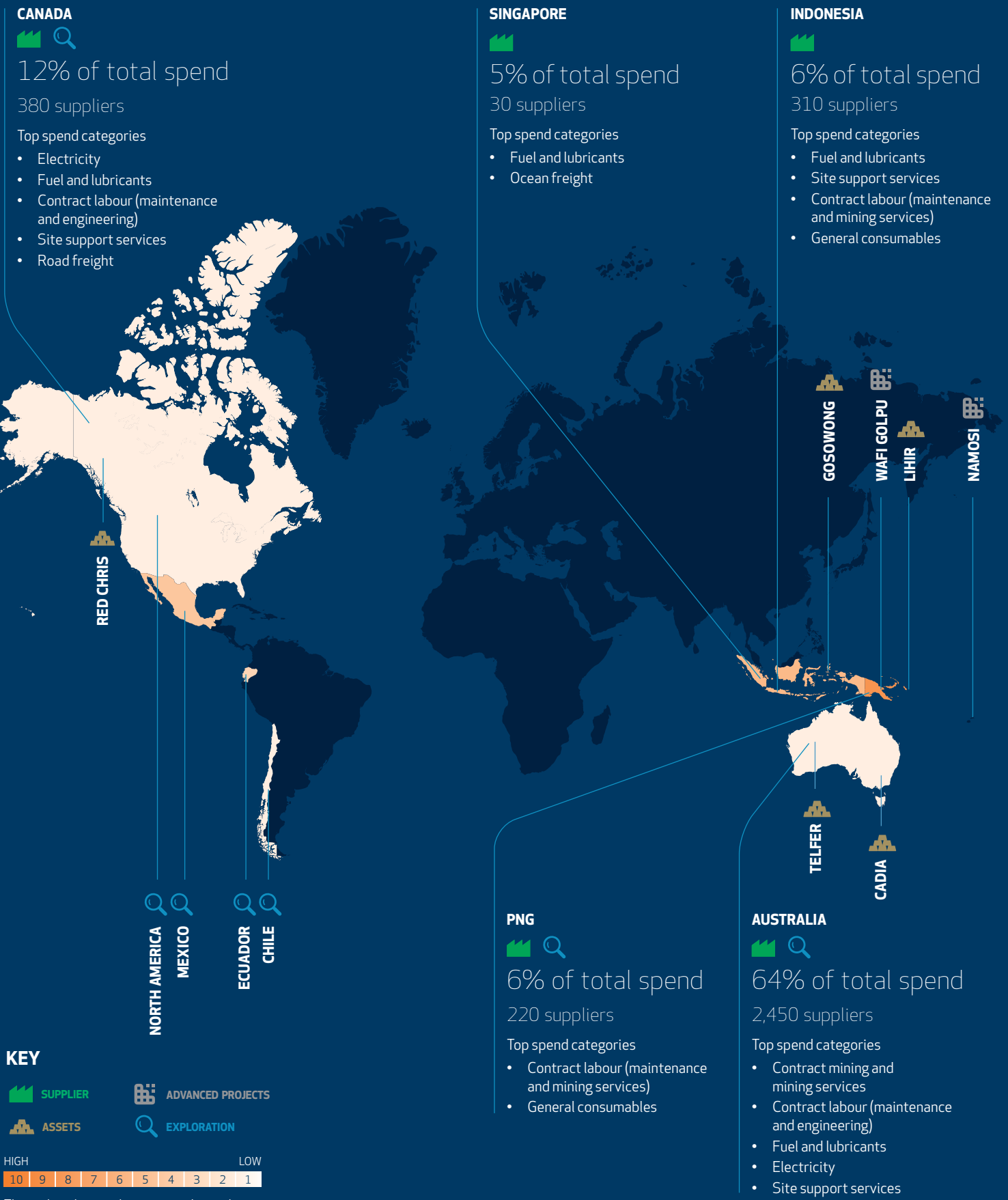
We have a 50% interest in the non-managed Wafi-Golpu (PNG) joint venture (an advanced exploration project currently in the permitting stage). We also have a number of investments in minority-owned and managed, and minority-owned and non-managed, exploration projects under joint venture, as well as farm in and option arrangements. These exploration projects are located in Australia, the United States, Chile, Ecuador, Mexico and PNG.

Additional information about our assets and owned and controlled entities and investments is available on our website and in our [2020 Annual Report](#).

As at 30 June 2020, Newcrest had a workforce of 10,149 people, including 4,871 employees (made up of 4,334 permanent and 537 fixed-term employees) and 5,278 contractors. We employ 2,002 people in Australia, 2,271 in PNG, 558 in Canada and 40 in other countries.



Our assets and top 5 supplier countries



The scale indicates the estimated prevalence of modern slavery in a country and is taken from the Global Slavery Index 2018.

Notes:
 1. The supplier data in this map is for FY20.
 2. We sold our 75% interest in the Gosowong mine in Indonesia on 4 March 2020.

Key goods and services procured

Our supply chain

Newcrest has a diverse global supply chain through which we procure a range of goods and services in order to support our exploration, mining, processing, transportation and corporate support activities. This includes examples of key goods and services outlined in the diagram right.

Our procurement is managed by a central Procurement function based in Melbourne as well as site procurement teams.

During the year, our total spend was US\$2.44 billion (excluding Government & Tax payments and minor unallocated items) and we engaged with 3944 direct suppliers (the entities we directly contract with) located in 38 countries. Over 90% of our operational spend was with direct suppliers in 5 countries: Australia, PNG, Singapore, Canada and Indonesia (comprising 3390 suppliers as per map on page 5). We acknowledge that goods and services supplied by our direct suppliers may not be manufactured or provided in those direct suppliers' countries, but in jurisdictions that are higher risk for modern slavery.

Our top spend categories during FY20 were contract mining services, fuel and lubricants, maintenance services (including related contract labour), mining fleet and spare parts, site support (camp, catering and air charter services) and electricity.

The majority of our supplier spend is engaged on agreed standard condition contracts over longer rather than shorter timeframes (that is, 3 or more years).

\$US2.44b

in spend (excluding Government & Tax payments and minor unallocated items)

3,944

Suppliers

38

Countries

Key goods and services procured



Our modern slavery risks

MSA Mandatory Criteria 3

We are committed to identifying and addressing the modern slavery risks in both our operations and supply chain.

Modern slavery constitutes one of the most egregious abuses of human rights. It is defined in the Modern Slavery Act to include forced labour, human trafficking, debt bondage, servitude, deceptive recruiting for labour or services, and the worst forms of child labour. In 2020, we engaged external advisors Pillar Two to undertake a modern slavery risk review of our operations and supply chain, which included consideration of country and category risks. This included consideration of the modern slavery risks of the countries we operate in and source from, and categories of goods and services that we procure. This work built on a supply chain risk assessment we undertook in 2018 with EY which included human rights issues including modern slavery.

We remain committed to identifying and addressing the modern slavery risks in both our operations and supply chain, although have assessed that the risks are more significant in our supply chain.

Drawing on the 2018 and 2020 assessments, we have identified the procurement of the following goods and services, in no particular order, as being higher risk for modern slavery, based on a range of factors including sector risks (e.g. use of low skilled labour, migrant workers, reliance on third party labour hire or other vulnerable workers) and country risks (e.g. goods produced in countries with higher prevalence of modern slavery):

- PPE and other apparel
- Ocean freight
- Labour hire and contractors on site
- Site and mining support (including cleaning, catering, security and operational and mining support particularly involving manual labourers)
- Information technology
- Construction
- Goods manufactured in high risk countries

We have several policies and processes in place, including supplier due diligence, to mitigate the risk of modern slavery in relation to the procurement of these goods and services (discussed in further detail in the next section).

In our operations, our modern slavery risks (for example, in engaging employees and contractors, or in our workforce procuring services from the local community) are largely dependent on the operating context, although risks exist in all countries.

Our majority-owned and managed operating assets are located in Australia, Canada and PNG. For part of the year, we also operated the Gosowong mine in Indonesia. We recognise that there are heightened risks of modern slavery in certain jurisdictions. In PNG, this includes a potential risk of exposure to child labour due to lack of reliable birth data and requests from communities to maximise employment. To mitigate this risk, our human resources teams screen applicants in line with Newcrest recruitment processes, which includes using reliable records on worker ages where available.

We have majority-owned and managed exploration projects in Australia, Fiji and PNG, and manage exploration projects in which we have the right to earn a majority interest in Chile, Ecuador and the United States. During the reporting period, we had investments in non-managed exploration projects in several countries including Mexico, Argentina, Ecuador, PNG and the United States. We recognise there is a heightened risk of modern slavery in some of these countries. We mitigate these risks through applying our policies and processes to our exploration projects' operations and supply chains. In relation to our non-managed exploration projects, we will engage with our joint venture partners in relation to the management of human rights including modern slavery risks as the projects progress.

Wafi-Golpu is an advanced exploration project in PNG currently in the permitting phase. Newcrest and Harmony Gold Mining Company Limited (Harmony) each currently own 50% of the Wafi-Golpu Project through the Wafi-Golpu Joint Venture (WGJV). WGJV is not a reporting entity under the Modern Slavery Act; however the project is an important asset for Newcrest and we recognise it is of interest to our stakeholders. During FY21, we will engage with Harmony and WGJV in relation to the management of human rights including modern slavery risks to build understanding around the Modern Slavery Act, identify opportunities for strengthening WGJV's approach, and reinforce our expectations.

CAUSE, CONTRIBUTE, DIRECTLY LINKED

In assessing our risk of involvement in modern slavery, we have used the concepts of cause, contribute and directly linked as set out in the UN Guiding Principles on Business and Human Rights and encouraged in the Australian Government's Guidance for Reporting Entities to the Modern Slavery Act.

A company may **cause** modern slavery if its operations directly result in such practices (e.g. if it used forced labour at one of its sites).

A company may **contribute to** modern slavery if its actions or omissions, in its operations or supply chain, contribute to such practices such as through incentivising or turning a blind eye to modern slavery (e.g. if unrealistic cost and timeframe expectations were placed on a supplier which could only be met if they used exploited labour).

A company may be **directly linked** to modern slavery through the activities of another entity that it has a business relationship with, such as a joint venture partner or supplier (e.g. if a company procures goods that were manufactured using forced labour, even if this was multiple tiers down the supply chain).

Our approach to assessing and addressing our modern slavery risks

MSA Mandatory Criteria 4

Governance and Policies

Overarching accountability for respecting human rights sits with Newcrest's Board of Directors. Performance and reporting accountability is delegated to the Executive Committee (ExCo), with responsibility sitting with the Chief People and Sustainability Officer. Cascaded managerial accountability extends to all senior leaders, with specific attention to function and geographic location. Our Social Performance function has responsibility for managing our overall human rights approach and supporting implementation across other functions and sites.

In 2019, we established a cross-functional Modern Slavery Steering Committee focused on further strengthening our approach to assessing and addressing our modern slavery risks and reporting under the Modern Slavery Act. The Committee includes representatives from our Social Performance, Procurement, Legal, Risk and Compliance and Human Resources functions.

The following are the key policies and related procedures that are relevant to our human rights approach. These apply to all of our majority-owned and managed sites.

Newcrest's [Code of Conduct](#) sets out our blueprint for the way we do business. It details what we stand for, how we interact with our stakeholders and what they can expect from us. It also provides guidance for employees about Newcrest's expectations of them in their day to day work. It includes our commitment to respect the human rights of all stakeholders and our aspiration of being an industry leader in sustainable mining. Our Code of Conduct applies to everyone who works for Newcrest including directors, officers, employees, contractors, consultants and third parties.

Our Human Rights Policy sets out our commitment to respect the human rights of all our stakeholders, and to seek to prevent or mitigate any negative impacts of our activities. It includes a specific commitment to not engaging in or condoning forced, compulsory or child labour, and to work to ensure that these are not present in our workforce or supply chain. After the end of the reporting period, we updated our [Human Rights Policy](#) to strengthen its alignment with the UN Guiding Principles on Business and Human Rights (UN Guiding Principles) and Modern Slavery

Act. This included the incorporation of an express reference to modern slavery among other changes. We consider that the updated policy will support the strengthening of our approach to assessing and addressing modern slavery risks including by setting clearer expectations for employees, suppliers and other stakeholders.

Other company policies with specific references to human rights include Sustainability Policy, Community Policy and Supply Policy. Our [Sustainability Policy](#) incorporates a commitment to respect the human rights of our employees, contractors, suppliers and community members.

Our [Communities Policy](#) outlines the principles that guide our engagement with communities. It includes a specific commitment to respect and protect the human rights of our host community members in all our own dealings with them.

Our Supply Policy requires human rights considerations (together with other risk management and sustainability commitments) to be incorporated into supplier selection and contract management.

These policy commitments are supported by a number of standards and processes, which are discussed further below. These processes include an annual human rights assurance review to assess implementation of the commitments made in our Human Rights Policy.

We also recognise the links between bribery and corruption risks and human rights including modern slavery risks, and have a number of anti-bribery and corruption (ABC) policies and processes. Our [Anti-Bribery and Corruption Policy](#), Code of Conduct and other related policies strictly prohibit activities involving bribery, corruption, unauthorised payments or exercising improper influence by all employees and contractors, and require compliance with applicable ABC laws wherever we conduct business. We undertake ABC due diligence checks on our higher risk suppliers and customers, and include ABC clauses in our standard contracts with third parties. In FY20, 524 employees and 53 contractors who were identified to occupy high-risk roles undertook ABC training.

Requirements for suppliers

Our Supplier Performance Commitments set out our expectations of all suppliers to Newcrest. Suppliers are required to acknowledge that they have policies and procedures in place to meet the expectations set out in our Human Rights Policy. The Supplier Performance Commitments also include specific expectations in relation to the prohibition of child labour, forced, bonded and involuntary labour, and respect for freedom of association. After the end of the reporting period, we updated our [Supplier Performance Commitments](#) to strengthen their alignment with the UN Guiding Principles and Modern Slavery Act. This included the incorporation of an express reference to modern slavery among other changes.

Our standard supplier contracts also contain human rights clauses, which require suppliers not to engage in conduct inconsistent with international human rights laws and standards as well as local laws in the countries in which they operate. They also include specific clauses relating to child labour and forced, bonded and involuntary labour. We also have the right to terminate a supplier contract for breaches of its human rights clauses including in relation to modern slavery issues, although to date we have not terminated a supplier contract on these grounds.

Our approach to assessing suppliers for human rights including modern slavery risks is outlined on page 10.

Our approach to assessing and addressing our modern slavery risks

MSA Mandatory Criteria 4

Risk management

Newcrest's overall approach to risk management is described in our Risk Management Framework, which is supported by a Risk Management Policy, Standard, and related Procedure. Newcrest's risks include corporate culture and business conduct, recognising that our reputation and license to operate are dependent upon ongoing responsible, lawful and ethical business conduct. We have a number of controls and systems in place to manage these risks.

Our modern slavery risks are managed as part of our broader human rights commitments and approach, which applies to all our owned and controlled entities and managed assets.

Assessing risks in our operations

We have undertaken social and environmental impact assessments at all of our operational sites, which include certain human rights risks. The modern slavery risk review undertaken in FY20 identified key modern slavery risks for our operations using a range of tools and resources such as the Global Slavery Index and US Department of Labor reports in relation to child labour and human trafficking.

We also undertake risk based due diligence in relation to new jurisdictions, investments and counterparties to agreements, which includes specific due diligence on human rights risks where appropriate. Our human rights due diligence in relation to counterparties includes consideration of a counterparty's human rights-related policies and frameworks, legacy human rights issues and any ongoing human rights impacts. Additional due diligence is also conducted for high risk jurisdictions, usually with the support of external advisors.



Our approach to assessing and addressing our modern slavery risks

MSA Mandatory Criteria 4

Assessing our supply chain risks

The independent supply chain risk assessment undertaken in September 2018 examined Newcrest's top 200 suppliers and our potential exposure to supply chain risk. Human rights including modern slavery risks were considered alongside a range of other business conduct and performance related risks. The modern slavery risk review undertaken during FY20, identified key modern slavery risks in our supply chain as detailed on page 7.

Our Procurement function has developed a Supplier Risk Framework based on recommendations from the 2018 assessment which we are continuing to implement. The framework includes supplier screening procedures, follow-up procedures for suppliers assessed as high risk, contractual requirements, and monitoring and compliance procedures. It was developed to manage a range of risks including business conduct (including bribery and fraud), risks to communities, the environment and human rights (including safety and modern slavery risks) and supply chain risks. To support implementation of the framework we added two new roles to the Procurement team.

As part of our supplier onboarding processes, all new suppliers are required to acknowledge our Supplier Performance Commitments. In addition, we conduct a due diligence review of new suppliers and directors (including UN Security Council Sanction checks and a range of human rights related checks, that include modern slavery).

As part of our market engagement process for more significant contracts, potential suppliers are subject to the processes outlined above and must also complete our Supplier Sustainability Questionnaire. The questionnaire includes a specific human rights section, which was strengthened during FY20 including in relation to modern slavery risks. Responses are reviewed by the Procurement function and any concerns are followed up and escalated as appropriate with a determination made as to whether to use the supplier or not, and if using them whether to impose conditions or require an improvement plan.

Following the 2018 supply chain risk assessment, we have also been undertaking an ongoing review of our existing suppliers. Suppliers identified as critical or high risk, based on a number of factors including human rights risk and spend, have been asked to complete our Supplier Sustainability Questionnaire with responses being reviewed and followed up as appropriate. To date, we have completed the review of 100 out of 180 high risk and critical suppliers that were identified during FY19, with the remainder due to be reviewed during FY21. From this review we identified 20 suppliers that required additional follow up to clarify their approach, and 10 suppliers are being monitored although not in relation to modern slavery issues. During FY20, we also identified an additional 70 high risk suppliers to be reviewed during FY21.

Newcrest does not currently audit suppliers in relation to modern slavery risks. As we continue to mature our supply chain due diligence approach, we intend to introduce additional assurance processes for higher risk suppliers, including audits.

As a result of the COVID-19 pandemic, we increased our purchasing of PPE and medical supplies. There have been challenges in assessing modern slavery risks in relation to these purchases, and we recognise that this has increased the risks of modern slavery in our supply chain. To help manage these risks, preference was given to sourcing from existing suppliers. Our processes involved ensuring that relevant product standards were met and questioning existing suppliers about any changes to their supply chain that could pose additional risks, including in relation to modern slavery. Where we needed to source items from new suppliers to urgently meet increased demand, we performed rapid vendor onboarding checks (including UN Security Council Sanction checks and a range of human rights related checks, that include modern slavery).

We were also able to use our existing relationships with suppliers to help support the provision of PPE and medical supplies to local communities located near our operating sites. In addition, we established a Community Support Fund to actively contribute to the management, mitigation and socioeconomic recovery from the COVID-19 pandemic in the jurisdictions and communities closest to our mines, in particular Australia, PNG, Canada and

Ecuador. This has included applying our supplier due diligence process to project partners, which includes assessing partners for human rights including modern slavery risks.

During FY21, we will undertake deeper due diligence into PPE and other apparel which will include specific consideration of risks heightened by the COVID-19 pandemic, ocean freight and the supply of goods to Lihir, our operating site in PNG, to gain a better understanding of our risks relating to these categories and identify opportunities to address these risks. We are currently undertaking an operational review of our approach to labour supply. Once that work is completed, we will also look to conduct deeper due diligence into modern slavery risks related to labour supply and contractors at Lihir as a further priority.

Supplier Sustainability Questionnaire

- Our Supplier Sustainability Questionnaire includes a range of questions relating to human rights including modern slavery, including in relation to the following:
 - Documented policies and/or processes in relation to human rights including modern slavery, in the supplier's operations and those of its suppliers
 - Composition of workforce including use of labour hire workers
 - Human rights training for employees
 - Retention of identity documents
 - Use of recruitment fees
 - Whistleblowing policy and/or procedure
 - Risk assessment in supplier's own supply chain
 - Supplier's expectations and screening of its own suppliers including in relation to human rights

Termination of relationship with supplier in Lihir

Case study

During the reporting period, we became aware through contractor complaints registered in our Contractor Issues Register that a company we were using at our site in Lihir in Papua New Guinea was repeatedly late paying its bus driver employees.

Our site contracts team investigated and substantiated the allegations, looking at historical contractor complaints raised by the company's employees, and formally asked the company to promptly rectify the situation. The company did not address the situation, and we decided to terminate our contract with them. Before doing so, we ensured that

we had an agreement with another bus driver company which agreed to employ the affected employees and pay them the amounts they were owed by the other company with our site reimbursing them for this cost.

While this is not an example of modern slavery, it is on the continuum of exploitative practices that can potentially lead to modern slavery if not addressed. It also highlights our efforts to take a collaborative approach to ensure that decisions to stop working with a supplier on human rights-related grounds does not have inadvertent negative consequences for their workers that could further exacerbate human rights issues.



Our approach to assessing and addressing our modern slavery risks

MSA Mandatory Criteria 4

Training and capacity building

All employees and embedded contractors are required to complete Code of Conduct training at induction and then every two years. Security employees and contractors are required to complete additional human rights awareness training through our Security Code of Conduct. This is aligned with the Voluntary Principles on Security and Human Rights and emphasises both respect for the communities in which we operate and zero tolerance for human rights abuse.

However, we recognise a need to provide more focused human rights training to further support the embedding of relevant policies and processes across the business. We are developing new human rights training which will incorporate raising awareness around modern slavery. It will be rolled out in FY21, initially to team members in roles with key responsibilities related to managing human rights including modern slavery risks.

Remediation processes

Our Speak Out service is a confidential and anonymous mechanism for current and former Newcrest employees, officers, contractors, consultants and suppliers to raise concerns, including those relating to human rights, through an independent third party. During FY20 we undertook a communication program to raise awareness about the Speak Out service among employees and contractors. Our Supplier Performance Commitments also promote the service to suppliers, and during FY20 we received one supply chain complaint from a supplier's sub-contractor in relation to payment terms. The issue was resolved, and the supplier was re-trained in our Code of Conduct and values and put on a quarterly review.

In addition to our Speak Out service, our Social Performance Standard also requires each of our operating sites to have a grievance mechanism. The Standard is supported by our Community Concerns, Complaints and Grievances Guideline, which incorporates the UN Guiding Principles' criteria of effectiveness for non-judicial grievance mechanisms.

After the end of the reporting period, we updated our Human Rights Policy to reflect our commitment to maintaining effective grievance mechanisms for stakeholders to raise complaints or concerns and, where we identify that we have caused or contributed to adverse human rights impacts, to providing for or cooperating in their remediation. We also strengthened our Supplier Performance Commitments to include expectations that suppliers establish their own mechanisms to consider, manage and remedy complaints.

No modern slavery issues were raised through either the Speak Out service or our operational-level grievance mechanisms during the year. However, we recognise that this does not necessarily mean that no such issues exist, and we will continue to look for ways to strengthen the effectiveness of our mechanisms for the raising of human rights including modern slavery issues.



Assessing the effectiveness of our approach

MSA Mandatory Criteria 5

We are committed to continuous improvement in our approach to human rights including modern slavery.

The following outlines the steps we take to assess the effectiveness of our approach, in order to continue to strengthen our policies and processes.

Modern slavery gap analysis

During FY20, we engaged external advisors to undertake an independent gap analysis of our policies and practices against the UN Guiding Principles and Modern Slavery Act mandatory criteria, and to benchmark our approach against a group of peer companies. We have developed a roadmap for implementing recommendations from that analysis.

Human rights assurance reviews and audits

We schedule a human rights assurance review at a corporate level and at selected operational sites each year according to risk. These reviews assess the implementation of the commitments in our Human Rights Policy. The outcomes from our human rights assurance reviews are reported to our Executive Committee, with functions engaged to action recommendations.

The human rights assurance review undertaken in 2019 assessed and supported progress against the recommendations from the 2018 review. It found that we still need to develop further internal capacity and understanding on human rights management. It also identified opportunities to strengthen our supply chain approach. One part of our response to the recommendations involved an independent supply chain risk assessment (discussed in more detail in the previous section). We also improved our supplier due diligence processes including the sanction checking component of our supplier due diligence activity to better identify more significant risks of supplier incidents of forced, compulsory or child labour. Other recommendations from the review included developing human rights training, strengthening community grievance reporting and management, and updating our Speak Out service and workplace incident processes to improve the identification and

management of human rights-related incidents, and routine analysis of remediation results. We have implemented or are in the process of implementing these recommendations. The 2020 human rights assurance review that was scheduled during the reporting year has been delayed due to the COVID-19 pandemic. We will complete the review when restrictions relating to COVID-19 allow.

Our Human Rights Audit Protocol sets out the process for the human rights assurance. The Protocol also outlines a process for independent human rights audits to be conducted every three years. The first audit will be conducted in FY22.

After the end of the reporting period, we updated our Human Rights Audit Protocol to strengthen its alignment with the UN Guiding Principles and Modern Slavery Act. Accordingly, future human rights assurance reviews and audits will specifically assess our approach to modern slavery.

Supplier due diligence

Our Procurement function tracks key data from its supplier due diligence processes, including the number of suppliers that complete our Supplier Sustainability Questionnaire and the number of suppliers we follow up for additional information. We maintain close dialogue with our suppliers, primarily through contract performance review meetings. The Procurement function is also implementing an internal functional assurance program, which in FY21 will include reviewing compliance with our supplier due diligence program.

Grievance mechanisms

We monitor and review complaints raised through our Speak Out service and site-level grievance mechanisms which helps to identify opportunities to strengthen our human rights approach. Internal audits are also conducted in relation to the Speak Out service, most recently during FY20.

We are considering the development of specific key performance indicators (KPIs) to help us track the effectiveness of our human rights approach, including in relation to modern slavery. We recognise that certain KPIs, for example those that focus heavily on procurement cost reduction, can potentially increase human rights including modern slavery risks. Our procurement KPIs recognise that a range of risk management factors, including human rights risks, must be appropriately considered as part of our supplier evaluation and selection process before cost savings are focused on.

Reflections on the human rights assurance review process

Case study

A key opportunity we identified was to build more awareness and capacity around human rights.

The annual human rights assurance review process was introduced in 2017, with an early focus on capacity building. An initial baseline assessment and gap analysis was completed during 2017 and 2018, and during 2019 we completed our second assurance review. The 2020 review has been delayed due to the COVID-19 pandemic.

Our Social Performance function, which leads the assurance reviews, provide some reflections on the process.

What does the assurance review process involve?

The assurance review process involves a representative from our group Social Performance function visiting each of our majority-owned and operated sites and engaging with the site leads for Social Performance, Human Resources, Procurement and Security to understand how they are implementing our human rights-related commitments. The process also involves engaging with key corporate functions. This provides good insight into how we are managing our human rights risks, and helps us develop recommendations for continuously improving our approach. The process also plays an educational role, as it allows us to sit down with various parts of the business to build awareness and capacity.

How will the assurance review process help in assessing and addressing modern slavery risks?

The process includes reviewing how our commitments around labour rights abuses such as child labour, forced labour, trafficking and poor working conditions are being managed. Our reviews have identified our supply chain as one of the most challenging areas for our human rights agenda, and the Procurement team has significantly strengthened its approach including in relation to modern slavery risks. We are also updating our internal human rights assurance protocol and assessment tool for greater alignment with the Modern Slavery Act.

What's next for the assurance review process?

A key opportunity we identified was to build more awareness and capacity around human rights, including modern slavery, across our Group and site functions. We're currently developing new human rights training to help in this regard.



Consultation with owned and controlled entities

MSA Mandatory Criteria 6

All our owned and controlled entities operate under Newcrest's Group policies and processes, including in relation to human rights.

Implementation of Newcrest's human rights approach at our majority owned and controlled operating assets is assessed each year as part of our annual human rights assurance review, which involves engagement and consultation with staff at these sites.

We have also written to the Newcrest Directors of all our owned and controlled entities to ensure they are aware of our modern slavery related responsibilities and commitments and to provide an opportunity for review of and input into this Statement. We are currently working to strengthen our approach to engaging in an ongoing way with our exploration assets and joint ventures in relation to human rights including modern slavery.



Engagement and collaboration

MSA Mandatory Criteria 7

Engagement and collaboration are critical to addressing human rights challenges including modern slavery.

We are members of the International Council of Mining and Metals, Minerals Council of Australia and World Gold Council. Each of these organisations' frameworks incorporates human rights expectations. We engage with peers and other stakeholders through these organisations to continuously improve our approach.

Specifically on modern slavery and the Modern Slavery Act, we have actively engaged in industry dialogue through the Minerals Council of Australia. This has included contributing to industry submissions to government.



Looking forward

We are committed to building on our work to date to further embed our human rights policies and processes across the Group, and to continue strengthening our management of modern slavery risks.

During FY21, we will focus on:

Governance and Policies

- Updating our Human Rights Policy, Human Rights Audit and Performance Protocol and Human Rights Assurance Tool for greater alignment with the UN Guiding Principles and Modern Slavery Act.
- Developing a Human Rights Standard which will incorporate a process for cascading our human rights including modern slavery-related policies and processes through all owned and controlled entities.
- Strengthening our Supplier Performance Commitments and Supplier Sustainability Questionnaire in relation to modern slavery.
- Updating our standard supplier contracts to include a right to audit suppliers in relation to their compliance with applicable modern slavery laws.
- Reviewing supplier contracts being used by sites and JVs.

Due diligence and risk assessment

- Completing our assessment of existing suppliers that are 'critical' and 'high risk'.
- Conducting deeper due diligence into key modern slavery risks areas in our supply chain, in particular PPE and other apparel which will include specific consideration of risks heightened by the COVID-19 pandemic, ocean freight and the supply of goods to Lihir, our operating site in PNG.
- Reviewing our implementation of human rights screening, the inclusion of human rights-related clauses in agreements and tracking of human rights clauses for JVs, investments and M&A; embed human rights including modern slavery more comprehensively into counterparty due diligence processes.
- Reviewing recruitment policies, standards and procedures to ensure key modern slavery-related risks are expressly covered; review agreements with recruitment agencies and labour hire firms to ensure appropriate modern slavery protections.

Training and awareness raising

- Developing and rolling out human rights training across the company, which will include modern slavery content.
- Building awareness of modern slavery with key personnel at Lihir including in the Procurement function.
- Developing internal Human Rights Guidance Document or FAQs which explains and provides guidance on the Human Rights Policy and related policies and processes for employees.
- Identifying ways to raise awareness of our grievance mechanisms with potentially affected stakeholders.
- Engaging with our joint venture partners for our managed and non-managed exploration projects in relation to the management of human rights including modern slavery risks.
- Engaging with a group of external stakeholders for feedback on our 2020 Modern Slavery Statement and the company's modern slavery approach, and to provide input into our 2021 Modern Slavery Statement.

Newcrest Mining Limited

ACN 005 683 625

Level 8

600 St Kilda Road

Melbourne, Victoria 3004

Australia

newcrest.com

