

Modern Slavery Policy

1 June 2020





Code of Conduct

Our People

- Diversity & Inclusion Policy
- Equal Employment Opportunity Policy
- Health & Safety Policy

Community & Environment

- Community Relations Policy
- Donations, Sponsorships and Community Programs Policy
- Environmental Policy
- Modern Slavery Policy

Business Integrity

- Anti-Bribery and Anti-Corruption Policy (inc. Gifts, Entertainment and Hospitality)
- Code of Conduct
- Conflict of Interest and Related Parties Policy
- Securities Dealing Policy
- Whistleblower Policy

Safeguarding St Barbara

- Continuous Disclosure and External Communication Policy
- Privacy Policy
- Risk Management Policy
- Social Media Policy

Key internal documents

- Domestic & Family Violence Policy
- Fitness for Work Policy
- Grievance Resolution Framework
- Leadership Framework
- Mental Health Policy
- Workplace Behaviour Policy

- Health, Safety, Environment and Community Management System

- Whistleblower System

- Delegation of Authorities Matrix
- IT Usage Guideline
- Procurement Policy
- Records Management Policy
- Risk Management Framework
- Tax Management Framework
- Treasury Policy

Our commitments



Safety Always



**Empowered People
Diverse Teams**



Stronger Communities



Respecting the Environment



Growing Sustainably

Our values

We act with honesty and integrity

We treat people with respect

We value working together

We deliver to promise

We strive to do better



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1. Purpose

St Barbara Limited and its subsidiaries (collectively, **St Barbara**) are committed to complying with all legal obligations and maintaining high standards of ethics and integrity in all St Barbara dealings.

This modern slavery policy (**Policy**) outlines St Barbara's commitment to eliminating modern slavery within its operations and supply chain, and supplements St Barbara's employment policies and standards as set out in St Barbara's Code of Conduct and Supplier Code of Conduct.

St Barbara will seek to eliminate modern slavery within its operations and supply chain by:

- (a) Complying with applicable legislation that supports the elimination of modern slavery wherever we operate. If this Policy goes further than local laws, we operate in accordance with this Policy. If this Policy conflicts with local laws, we will follow local law while trying as far as possible to act in accordance with the spirit of the Policy.
- (b) In relation to our operations:
 - ensuring that all of our employees work for us voluntarily and are able to provide evidence that they are older than the minimum working age in the jurisdiction in which they work;
 - ensuring that all of our employees are paid the minimum wage in the jurisdiction in which they work;
 - training our staff in relation to how to identify indicators of modern slavery; and
 - annually assessing our operations for modern slavery risk.
- (c) In relation to our supply chain:
 - seeking to engage suppliers who uphold St Barbara's commitment to eliminating modern slavery practices;
 - wherever possible, requiring St Barbara's suppliers to agree to comply with the St Barbara Supplier Code of Conduct, this Policy and other related policies in relation to their own operations and supply chains;
 - undertaking regular due diligence on our supply chain to identify and address any actual or potential risks of modern slavery;
 - working with our suppliers to assist them to identify and manage the risk of modern slavery within their operations and supply chain; and
 - making our Whistleblower program available to St Barbara suppliers and their employees.
- (d) Working with St Barbara Personnel and affected persons (where appropriate) to provide effective remedies where we directly cause or contribute to modern slavery.
- (e) Implementing a procedure for reporting actual or suspected modern slavery practices.

2. Scope

This Policy applies to all individuals at all levels who are employed by, act for, engaged by or represent St Barbara (**St Barbara Personnel**, also referred to as '**you**' in this Policy) anywhere in the world.

For the purposes of this Policy, St Barbara Personnel includes:

- directors;
- officers;
- managers;
- employees (regardless of whether they are employed on a full-time, part-time, maximum term, casual or temporary basis);
- contractors;
- suppliers;
- consultants; and
- any other person representing or acting on behalf of St Barbara.

St Barbara intends for this Policy to be read in conjunction with its Code of Conduct, Equal Employment Opportunity Policy and Workplace Behaviour Policy.

This Policy may be amended from time to time.



3. Roles and Responsibilities

Role	Responsibilities
St Barbara Board of Directors	<ul style="list-style-type: none"> Review and authorise the annual Modern Slavery Statement. Delegate responsibility to the Managing Director and CEO for implementing the Policy, reporting and making recommendations to the Board as appropriate.
Managing Director and CEO	<ul style="list-style-type: none"> In conjunction with the Executive Leadership Team: <ul style="list-style-type: none"> implement this Policy; ensure preparation and filing of annual Modern Slavery Statement; review the Policy as required; and address modern slavery related issues, report and make recommendations to the Board, as appropriate.
St Barbara Personnel	<ul style="list-style-type: none"> Ensure compliance with this Policy and/or applicable laws and regulations. Comply with the Supplier Code of Conduct when procuring or providing goods or services. Provide information as requested for the annual St Barbara Modern Slavery Statement. Attend company-provided education and awareness sessions on modern slavery

4. Compliance – Reporting

St Barbara expects that anyone involved with our business will report known or suspected cases of modern slavery, violations of the Supplier Code of Conduct, this Policy or other ethical standards.

Any actual or suspected breach of this Policy or of any applicable laws must be reported to the relevant St Barbara General Manager or Manager Procurement.

If you do not feel comfortable making a report to the relevant St Barbara General Manager, or the Manager Procurement, you can contact one of the following:

- a St Barbara Human Resources representative;
- a St Barbara HSEC representative;
- St Barbara's Company Secretary;
- St Barbara's General Counsel & Deputy Company Secretary; or
- the Whistleblower service listed below.

5. Whistleblower

You may report to St Barbara's confidential external independent Whistleblower Provider, Your-Call. A secure report can be made (including an anonymous report) via:

Website: www.yourcall.com.au/report (Company ID: STBM1986)

Telephone line 9:00 am to 12:00 am midnight Monday to Friday (AEST / Melbourne time) except National Public Holidays. Calls are taken by a trained Protected Disclosure Officer

Australia 1300 798 101

Canada (800) 897 2761

PNG 00086 1281

Your-Call will notify St Barbara's Whistleblower Protection Officers within 24 hours of receiving a report. An automated message will be sent to the discloser to confirm the report has been sent to St Barbara.

Postal Mail: St Barbara Whistleblower Service
 Locked Bag 9
 Collins St East VIC 8003
 Australia



For more information, please refer to the St Barbara Whistleblower Policy.

Retaliation against those who raise concerns is strictly prohibited.

6. Compliance - Response

All reports of suspected or actual modern slavery must be referred to the General Counsel & Deputy Company Secretary.

The General Counsel & Deputy Company Secretary will:

- (a) notify the Executive Leadership Team of the report of actual or suspected modern slavery;
- (b) provide to the Executive Leadership Team a recommended response to the report that prioritises protecting the rights of the person or persons suspected of being enslaved; and
- (c) if it is appropriate or mandatory to do so, report the actual or suspected modern slavery to the relevant authority.

The Corporate Services function of St Barbara is responsible for managing the internal and external communications regarding reports of suspected or actual modern slavery.

The Executive Leadership Team will determine how to respond to the report of actual or suspected modern slavery, including, where appropriate, advising the Board.

7. Annual Disclosure

St Barbara will submit an annual statement setting out how modern slavery is assessed and addressed in its operations and supply chains (including all its subsidiaries).

The statement requires Board approval and will be included in a public, online register administered by the Australian Department of Home Affairs.

8. Policy Publication

This Policy or a summary of its main provisions will be made available on St Barbara's website.

9. Policy Review

This Policy will be reviewed as soon as practicable after a key change in the nature or scope of St Barbara's activities, or otherwise at least once every two years.

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