

Effective Date: 22 February 2022

**Our aim is to ensure that we uphold human rights and prevent the abuses of human rights, within our operations, our offices and our supply chains.**

## Our commitment

St Barbara will comply with all legal obligations and maintain high standards of ethics and integrity in all St Barbara dealings including respecting human rights.

## Our approach

To achieve this commitment, St Barbara will:

- Work to align our business activities and practices with the *UN Guiding Principles on Human Rights*.
- Comply with all applicable legislation that seeks to uphold human rights where we operate.
- Recognise and respect the human rights of the communities where we operate, including First Nations peoples.
- Proactively engage with stakeholders on human rights issues and providing accessible and effective grievance mechanisms to resolve complaints in a timely manner.
- Identify, assess and take appropriate action regarding any human rights risks in our business and supply chain through ongoing human rights due diligence processes.
- Ensure appropriate remediation through legitimate processes occurs if St Barbara discovers that it is (or may be) associated with human rights violations.
- Seek to ensure respect of human rights by personnel engaged to provide security services and working towards alignment with Voluntary Principles of Security and Human Rights.
- Communicate our commitment to human rights to all stakeholders, including employees, contractors, suppliers and those working within our supply chains.
- Investigate all reports of suspected or actual breaches of human rights, respond to and act upon any report in a timely manner and make recommendations to the Board, as appropriate.
- Report any breaches of human rights, and matters relating to commitments to uphold human rights in its annual Sustainability Report.
- Provide relevant human rights education and training to employees.

## Responsibilities and accountabilities

This is a Policy of St Barbara Limited (“St Barbara”) and its controlled entities (collectively, “St Barbara Group”). It applies to all directors, officers, employees, contractors, consultants and suppliers of each member of the St Barbara Group and to any other person or organisation acting for or on behalf of the St Barbara Group (“Personnel”).

This policy will be reviewed regularly and updated as required.

## Policy governance

Policy Approver: St Barbara Board of Directors  
Policy Owner: Executive General Manager People  
Review Cycle: Annual

## Material policy revisions

Version	Approval Date	Effective Date	Details
1.0	22/02/2022	22/02/2022	New Policy/Material changes