
29 February 2024

Modern Slavery Statement FY23

The Attorney General's Department has published the St Barbara Limited (ASX: SBM) ("**Company**") 2023 Modern Slavery Statement ("**Statement**").

The Company's Statement is made pursuant to the Modern Slavery Act 2018 (Cth), for the financial year ended 30 June 2023, and was submitted to the Register on 20 December 2023.

A copy of the Statement is available on the Australian Government's Online Register for Modern Slavery Statements: [Statement #2023-2981](#)

Authorised by

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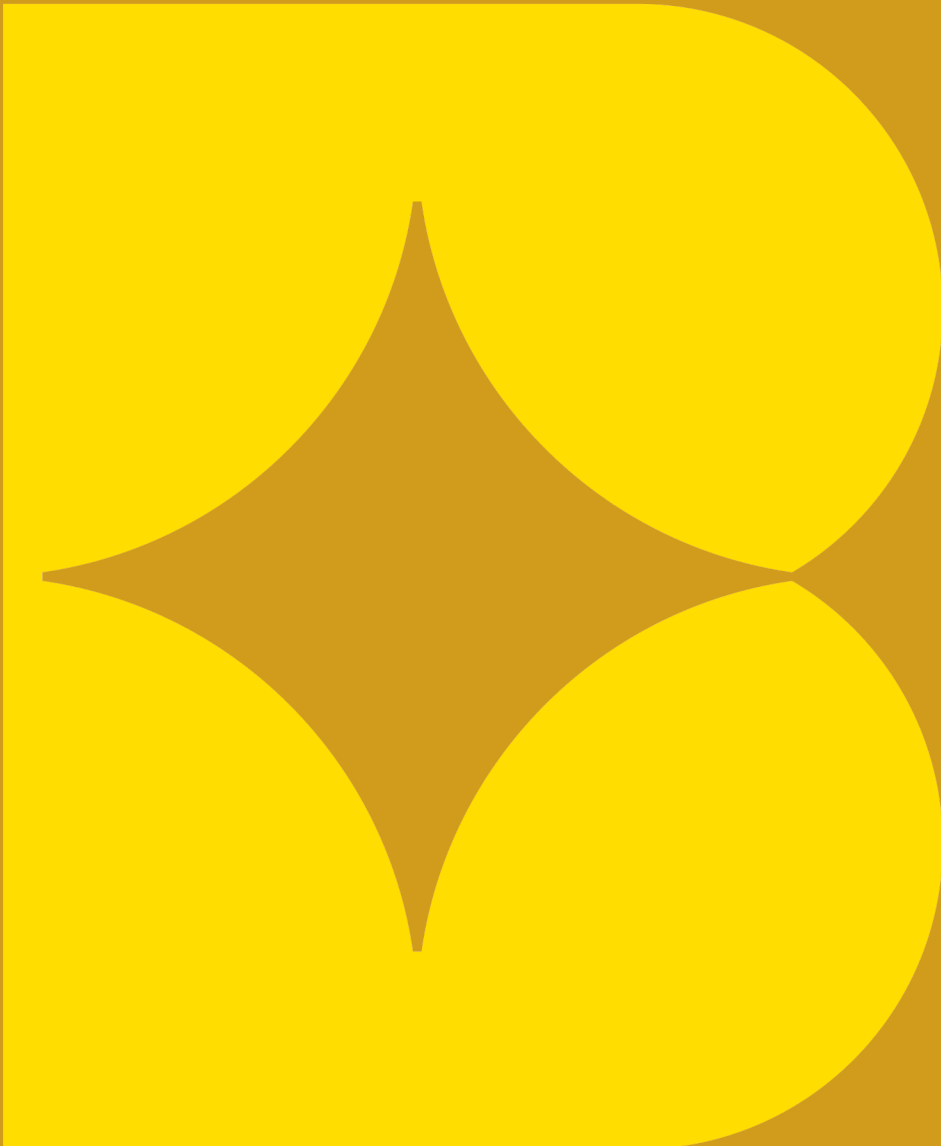
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Modern Slavery Statement FY23

1 December 2023





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1. Introduction

At St Barbara Limited (St Barbara or Company), we are committed to upholding high standards of integrity and ethical conduct in all our operations. We recognise our responsibility to ensure that our business practices in Australia, Canada and Papua New Guinea (PNG), do not contribute directly or indirectly to modern slavery or human trafficking in any form. We understand that responsibility extends beyond the well-being of our direct employees to the prosperity of the communities we touch and the environments we operate in. We believe that, together with our stakeholders, we can make a meaningful difference and set an example for ethical and responsible business practices in the mining industry.

During the 2023 Financial Year (FY23), St Barbara sold its Australian based Leonora Assets to Genesis Minerals Limited. This significantly changed the focus of the company and, alongside the cessation of the Touquoy operations in Canada, will continue to change our modern slavery assessment and focus for the 2024 financial year (FY24).

St Barbara Limited's Modern Slavery Statement outlines the Company's approach to evaluate and address its modern slavery risks. As a result, St Barbara's FY24 commitments continue to focus on making meaningful change in our Papua New Guinea operation and supply chain.

This Modern Slavery Statement (Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) by St Barbara Limited, for the financial year ended 30 June 2023 (FY23).

This document should be read in conjunction with St Barbara Limited's other periodic and continuous disclosure announcements lodged with the ASX, including its FY23 Annual Report and FY23 Corporate Governance Statement, which are available at <https://stbarbara.com.au/>

This statement is made pursuant to relevant modern slavery laws and was approved by the Board of St Barbara Limited on 1 December 2023.

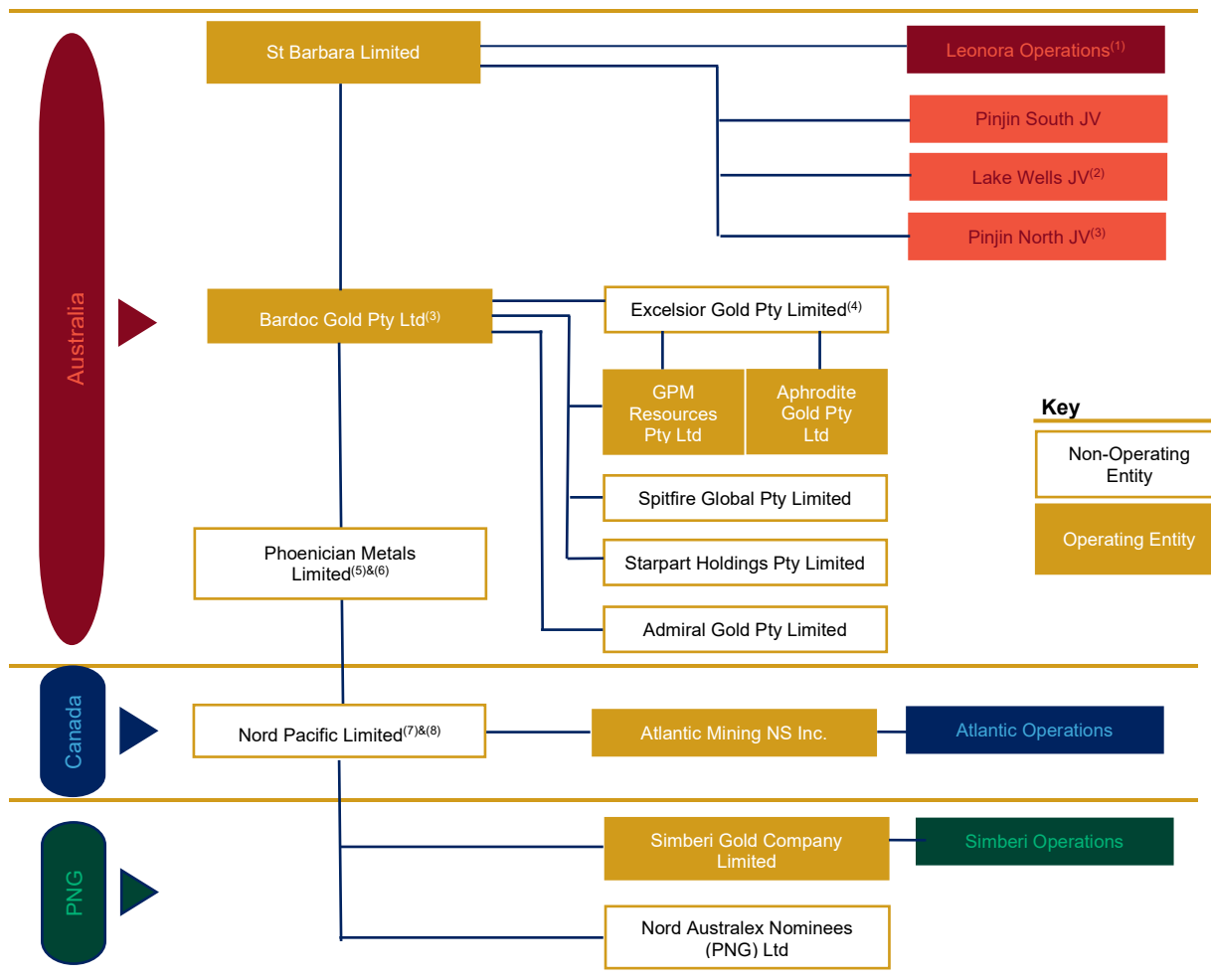
A handwritten signature in blue ink, appearing to be 'Andrew Strelein', written over a circular scribble.

Andrew Strelein
Managing Director & Chief Executive Officer

2. About St Barbara

2.1. Reporting Entity and Structure

This is a statement made on behalf of all the entities within the St Barbara Group for the reporting period. The ultimate holding company of the St Barbara Group is St Barbara Limited (ACN 009 165 066). St Barbara Limited (and its subsidiaries) is a gold mining company headquartered in Perth, Western Australia with operations in Canada and Papua New Guinea. We are engaged in exploration, development, mining, and the sale of gold.



(1) Company completed the sale of the Leonora Operations to Genesis Minerals Limited on 30 June 2023.

(2) Company withdrew from Lake Wells JV as at 12 August 2022.

(3) Company withdrew from Pinjin North JV as at 19 September 2022.

(4) On 30 June 2023, the Group sold Bardoc Gold Pty Ltd and its subsidiaries as part of the Leonora Asset Sale.

(5) On 7 March 2023, Allied Gold Pty Ltd changed its name to Phoenician Metals Limited and converted to a public company.

(6) On 20 July 2023, Phoenician Metals Limited converted to a proprietary company and changed its name to Phoenician Metals Pty Ltd.

(7) On 30 June 2023, the Group dissolved Nord Pacific Limited.

(8) On 30 June 2023, the Company transferred all of its shares in Atlantic Mining NS Inc, Simberi Gold Company Limited and Nord Australex Nominees (PNG) to Phoenician Metals Limited as part of the dissolution of Nord Pacific Limited.

2.2. Operations

During FY23, our operations included the below activities. St Barbara rationalised its operations significantly altering its strategy for FY24. Activities below that have been marked with an asterisk (*) are no longer part of the St Barbara portfolio.

Additional information about our assets and owned and controlled entities is available on our website and in our 2023 Annual Report.

2.2.1. Leonora Operation in Western Australia, Australia:

- Gwalia Underground Mine*
- Bardoc Gold Project*
- Leonora Processing Plant*
- Toll processing third party ore from Linden Gold Alliance Limited *

2.2.2. Simberi Operations in Simberi Island, New Ireland, Papua New Guinea (PNG):

- Open Cut Gold Mines
- Simberi Processing Plant
- Lytton Warehouse (Brisbane, Australia)*

2.2.3. Atlantic Operations, Nova Scotia, Canada:

- Touquoy Open Cut Gold Mine
- Touquoy Processing Plant
- 15-Mile Gold Project
- Beaver Dam Gold Project
- Cochrane Hill Gold Project
- Halifax Corporate Office

2.2.4. Corporate Functions & Exploration:

- Perth Head Office

- Melbourne Head Office *
- Exploration activities across:
 - Gwalia mine (Western Australia, Australia) *
 - Touquoy mine (Nova Scotia, Canada)
 - Tabar Island Group (New Ireland, PNG)
 - Pinjin (Western Australia, Australia)
 - Lake Wells (Western Australia, Australia)*
 - Back Creek (New South Wales, Australia)
 - Drummartin (Victoria, Australia)*

2.2.5. Operated and Non-operated Exploration Joint Ventures:

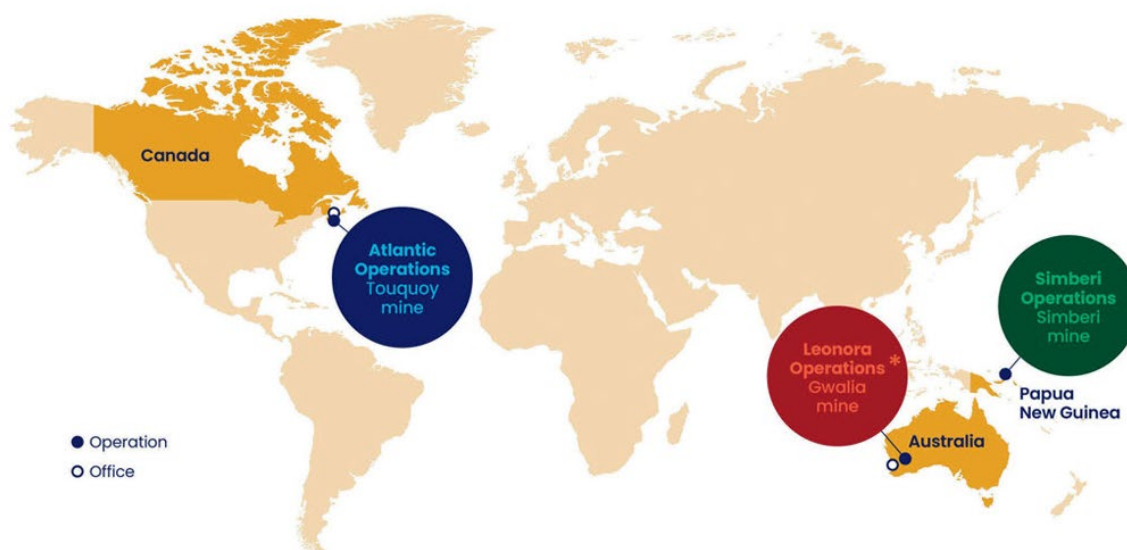
- Drummartin Earn-in and Joint Venture Agreement (with Catalyst Metals Limited and Kite Operations Pty Ltd) *
- Lake Wells Earn-in and Joint Venture (with Australian Potash Limited)*
- Pinjin North Farm-in and Joint Venture (with E79 Gold Mines Limited)*
- Pinjin South Earn-In and Joint Venture (with Plowden Resources Pty Ltd)

2.2.6. Minority Equity Investments in the following companies listed on the ASX:

- Catalyst Metals Limited (CYL)
- Peel Mining Limited (PEX)
- Kin Mining NL (KIN)

2.2.7. Minority Equity Investments in the following private company:

- Linden Gold Alliance Limited



* The sale of Leonora Operations was completed 30 June 2023

2.3. Values & Strategic Priorities

2.3.1. Statement

An Australian based, ASX listed company with gold mining operations in Canada and Papua New Guinea. We are driven by our values-led culture and adhere to our five commitments.

2.3.2. Our Commitments

- Safety Always
- Empowered People, Diverse Teams
- Stronger Communities
- Respecting the Environment
- Growing Sustainably

2.3.3. 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.

2.3.4. Strategic Priorities

The strategic focus areas for Atlantic comprise:

- Prioritising development of 15-Mile and target development in FY26.
- Investigating the repurposing of the Touquoy processing plant for use at 15-Mile.
- Completing processing of stockpiles at Touquoy.
- Pausing permitting process for Beaver Dam to allow further stakeholder engagement.
- Continuing exploration at Cochrane Hill, Mooseland, South-West and Goldboro East.

The strategic focus areas for Simberi comprise:

- Extending oxide production through FY25 and into FY26
- Extension drilling of the Sulphides Mineral Resource and Ore Reserve.
- Revisiting Sulphides Expansion development plan by FY26.
- Preparing for investment decision with Mining Lease renewal by FY28.

Additional strategic focus areas at the corporate level comprise:

- Establishing a refreshed corporate culture and identity focused on value.
- Actively managing the investment portfolio.
- Exploration of the Pinjin South project in WA and Back Creek project in NSW.

2.3.5. Sustainability

Environmental, social and corporate governance are central to our framework. We measure and report on our environmental, social, and economic performance in our Annual Report, we govern our business via approved charters, policies and standards, and our code of conduct ensures we do the right thing.

3. Supply Chain

St Barbara's suppliers are a crucial partner in achieving our modern slavery related objectives. St Barbara endeavours to buy locally in the country of operations, mitigating supply chain risk to business continuity and providing economic support to the countries and communities in which we operate.

In FY23, a centralised group procurement function was responsible for providing support to the business to fulfill operational requirements. The function utilised procurement practices provided commercial governance processes and management of supply chain risk and opportunities.

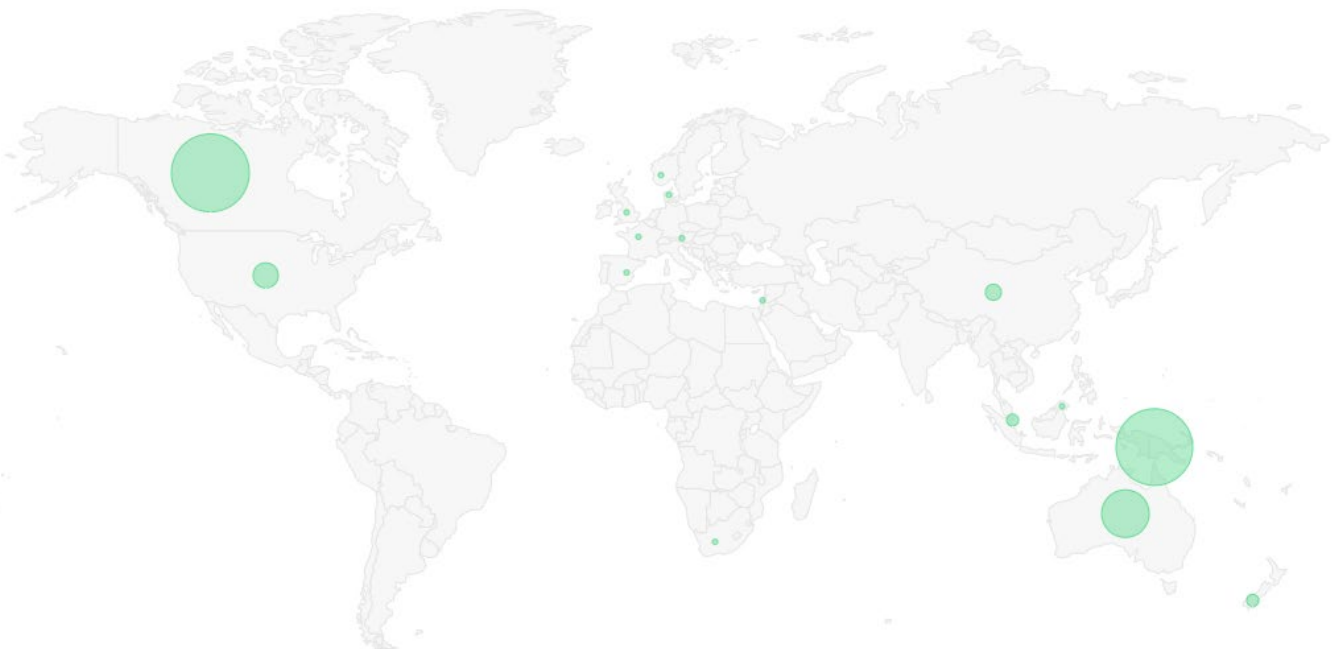
From FY24, following St Barbara's strategic redirection, the procurement function is now decentralised allowing closer relationships, accountability, and transparency with suppliers.

The St Barbara value chain and supply chain process is broadly described as follows: exploration, development, mining, processing, delivery of gold doré to the gold refinery and closure and rehabilitation.



Our suppliers provide goods and services from around the globe. Our supplier questionnaire was issued to approximately 393 of our first tier or direct suppliers. These suppliers represented approximately 98% of our overall spend. As can be seen in the below global info-graphic, the St Barbara suppliers were domiciled predominately in Australia, Papua New Guinea and Canada, reflecting the utilisation of local suppliers at our sites wherever possible.

We recognise that a number of our suppliers supply goods that are either grown or manufactured in locations other than where those suppliers are domiciled. Our focus has remained on our first-tier suppliers to build maturity with this group before we move onto the more complex challenge of understanding second tier suppliers.



4. Modern Slavery Risks at St Barbara

In consultation with management and key internal stakeholders, we have assessed modern slavery risks to identify and evaluate the potential risks of modern slavery in our operations and supply chains.

Recognising the shared responsibility, we collaborate with industry partners, Non-Government Organisations, and governmental bodies in Australia, Canada, and Papua New Guinea to tackle the challenges associated with modern slavery.

Consistent with the UN Guiding Principles on Business and Human Rights, we assess the risk of modern slavery practices in our operations and supply chain by determining whether we have caused, contributed to, or are directly linked to modern slavery. In response the below tables have been categorised into “Direct” (caused by St Barbara) and “Supply Chain” (directly contributed to by St Barbara) modern slavery risks.

The three jurisdictions we operated in during FY23 have very different modern slavery risks. Australia and Canada are ranked 148 and 145 out of 160 countries for modern slavery prevalence by the Global Slavery Index and therefore deemed low risk. In contrast, Papua New Guinea is ranked 20th for modern slavery prevalence by the Global Slavery Index and is therefore the key focus of our modern slavery risk management.

4.1. Direct Modern Slavery Risk

As a result of the low jurisdiction risk in Australia and Canada, combined with our transparent recruitment and remuneration programs, we consider that there is low risk of direct modern slavery practices in our Australian and Canadian operations. Therefore, the table below focuses on direct modern slavery risks in the Simberi Operation in Papua New Guinea (PNG).

Modern Slavery Form	Risk of Modern Slavery	Due diligence actions taken to address the risk	Actions effectiveness in FY23
Wages	<p>Risk profile unchanged from FY22.</p> <p>The Simberi ore body is not suited to artisanal mining and is a highly mechanised mining operation. Therefore, it typically employs “in demand” highly skilled staff, making modern slavery conditions less likely. Approximately 44% of the workforce at Simberi is “in demand” high skilled or management employees from other parts of PNG. Different to local employees and contractors, there is strong competition for these services from other mines and the Oil and Gas industry. This group is typically well paid compared to local standards, flown to site and home on short rosters (approximately three weeks on, two weeks off or 15 days on, 13 days off), and housed in an accommodation camp. The lack of artisanal mining at Simberi is a key mitigating factor with respect to the reduced risk of modern slavery practices at our Simberi Operations in PNG.</p> <p>There is no set living wage in PNG. The only form of set wage is the national minimum wage, which was created by the Minimum Wages Board of Papua New Guinea in 2014 (which did not include automatic factoring for inflation and has not been updated since).</p> <p>The national minimum wage in PNG is K3.50 per hour. The highest risk to paying below minimum wage at Simberi is a risk of payment error rather than systematic exploitation.</p>	<ul style="list-style-type: none"> – Remuneration Framework that guides how roles are salary assessed and grouped into salary banding. – Annual salary review to ensure pay equity amongst employees and to account for market & impacts. – Twice monthly review of Simberi payroll by the Australian corporate Human Resources and Finance functions. – Participation in the Korn Ferry Salary Survey which provides salary benchmarking data to ensure fair, transparent, and current remuneration based on experience and qualifications for a role. – A Workplace Consultative Committee, established that is made up of employees. The committee raise employment related concerns, provide feedback on employment matters and provide employee and engagement improvement opportunities to Simberi Management – Assessment of the effectiveness of the annual review process of salary/wages against minimum wage as well as fortnightly pay run approval process to ensure subject matter experts review an adequate segregation of duties. – Engagement of external provider to conduct an internal audit of the Simberi payroll for the 7 year period to ensure historic integrity of controls and process. – Annual Commitments as listed in Section 6. 	<p>The FY23 salary review resulted in:</p> <ul style="list-style-type: none"> – 565 PNG nationals receiving a pay increase of 4% in line with inflation. – our lowest annualised salary in FY23 is K12,420 per annum plus superannuation for entry level positions. – 32 PNG nationals received a promotion in FY23. – Implemented an annual review process to ensure adherence to PNG minimum wage requirements. – Internal audit of historic payroll will be completed within the first half of FY24. Outcome provided in 4.1.1.

Modern Slavery Form	Risk of Modern Slavery	Due diligence actions taken to address the risk	Actions effectiveness in FY23
<p>Child Labour</p>	<p>Risk profile unchanged from FY22.</p> <p>The International Labour Organisation (ILO's) publication, Child Labour In Mining And Global Supply Chains 2019, sites 'child labour in mining is most commonly found in artisanal and small-scale mines'¹. As such, the risk of child labour at Simberi is considered significantly lower.</p> <p>Verifying the age of locals on Simberi Island remains challenging as birth certificates are rarely held by candidates from local communities. National ID Cards (NID) are challenging for locals to obtain, and the majority of locals do not have driver's licenses as they do not have vehicles. The NID application process is long and requires the applicant to leave their island. Some locals have provided us with their "Clinic Book" which is the book that mothers are given when children are born on the island.</p> <p>Some employees have school certificates which can provide some indication as to the age of the individual, however, the certificates are not considered reliable in terms of validating age.</p>	<p>Recruitment Process includes:</p> <ul style="list-style-type: none"> - Applicants providing their age on employment forms. - Visual verification of employees and contractors age where age verifying documentation is not available. - Training and awareness programs provided to staff to recognize and prevent potential issues related to modern slavery. <p>Additionally, Simberi Operations engaged with the PNG Resources Industry Human Resources Network at the Korn Ferry Conference to share learnings with industry peers and determine whether any new methods were being used to support age verification.</p> <p>Annual Commitments as listed in Section 6.</p>	<p>Based on FY23 employment records there is no one working on the Simberi Operation under 18 years of age.</p>
<p>Living Conditions</p>	<p>Risk profile unchanged from FY22.</p> <p><u>Workplace:</u></p> <p>We provide camp accommodation, three meals per day, drinking water and amenities for those workers that fly into the island from other provinces of PNG for the purposes of work. This accommodation varies from single rooms with ensuite for more senior staff (Superintendent and Manager), to share rooms (with up to four employees in a room). The camp is maintained and cleaned daily by maintenance and cleaning personnel who are our direct employees.</p> <p>Local employees, who reside in the local village, are provided with three meals per day and break periods.</p> <p>All of our employees and contractors working on site receive appropriate Personal Protective Equipment including shirts, pants, work boots, hardhats and glasses, as required.</p> <p><u>Community Impact:</u></p> <p>PNG has a large proportion of the population living below the recognised poverty line. This is especially the case in regional isolated locations. However, labour conditions are often regulated by local customary systems - such as tribal and clan type organisations of mutual aid and reciprocity - making modern slavery (versus simple poverty) less likely.</p> <p>Living costs, including food costs, can increase in the locality of mines, often because the local area can no longer support the increased population or local farmers have become mine workers. There is some evidence this is the case at Simberi. A survey conducted for the 2019 Social Impact Study provided evidence that the population is reliant on imported foodstuffs. The importing companies are largely controlled by immigrants. Foodstuffs are typically sold at a premium compared to other parts of PNG due to the isolation of the Island and the scarcity of capital and networks for local business to set-up in competition with immigrants.</p>	<ul style="list-style-type: none"> - Established cleaning and maintenance protocols for the camp to ensure operating standards. - Conducted food handling and hygiene training for employees working in the camp kitchen. - Provide medical health care including preventative health checks to all employees. - Contribute to the provision of infrastructure to Simberi Island including but not limited to, medical health care, roads, airport, wharf, education, law & order, water and sanitation. - Annual Commitments as listed in Section 6. 	<p>Our 2009 benchmark study undertaken at the commencement of mining at Simberi, indicated the per household annual income was less than Kina 1,000 (US\$284). In 2017, the average household income had increased to over Kina 4,000 (US\$1,200).</p> <p>We are proud of the role we have played and continue to play in improving the living standards of the residents on Simberi Island and that of workers from other provinces of PNG.</p>

¹ ILO, Child Labour in Mining, 2019,

https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-manila/documents/publication/wcms_720743.pdf

4.1.1. Grievance

In June 2023 a salary and wage grievance was raised by the Workplace Consultative Committee (employee based group) to the Simberi Operation Management in relation to underpayment of overtime. As a result, an external provider was engaged to audit 7 years of wages to ensure compliance.

Following the completion of the audit, 32 employees were identified as being underpaid. A back pay payment was processed in November 2023, totaling \$40k AUD. In addition, 11 current employee’s salaries were identified as being below the minimum wage based on their current roster and this has been rectified.

Recommendations from the internal audit (provided by a third-party supplier) have been actioned and the configuration of rosters in the payroll system have been updated to accurately reflect the correct hours worked by employees to avoid any future underpayments. Findings of the audit have been communicated to the affected employees and the audit has been closed out.

4.2. Supply Chain Modern Slavery Risk

This section sets out the risks of modern slavery in our supply chain and the due diligence we have undertaken to assess and address those risks.

4.2.1. Australia & Canada

Risk of Modern Slavery	Due diligence actions taken to address the risk	Actions effectiveness in FY23
<p>Risk profile unchanged from FY22.</p> <p>As indicated in section 4., our Australian and Canadian operations are majority locally supplied. Both Australian and Canadian suppliers operate in strong regulatory environments and are subject to employment law that set minimum working standards and pay. The Australian Government has had the second strongest response globally to modern slavery according to the Global Slavery Index. Whilst the Canadian Government’s response doesn’t rank as high, it does have the 17th lowest slavery prevalence in the world.</p> <p>In Australia, according to the Global Slavery Index, forced labor predominantly occurs in high-risk industries such as agriculture, construction, domestic work, meat processing, cleaning, hospitality, and food services. The Mining Industry is not listed directly, and whilst utilises construction, cleaning and hospitality services, they generally are provided on our premises therefore providing transparency and the contractual requirement to adhere to our policies and procedures.</p> <p>Australia and Canada are not only affected by modern slavery within its borders: as two of the world’s largest economies, Australia and Canada – like other G20 countries – are exposed to the risk of modern slavery through the products it imports.</p> <p>The risk of modern slavery for the Australian and Canadian operations is within the small number of first tier suppliers (2% of the group’s suppliers in FY23) and second tier suppliers that are in higher modern slavery risk jurisdictions.</p> <p>All respondents to the modern slavery questionnaire confirmed they adhere to the St Barbara Code of Conduct which includes notifying St Barbara a suspected or actual breach of the policy. 47% of respondents indicated they have adopted a human rights policy within their organization.</p>	<p>Our due diligence measures include:</p> <ul style="list-style-type: none"> – Vetting of potential new suppliers via our third-party supplier before onboarding. – Conduct audits of our suppliers, contractors, and business partners to ensure their compliance with our standards. – Completed a business-wide Modern Slavery Risk Assessment to identify any new or emerging risks and corresponding actions to inform our FY23 actions. – Review of tendered rates for reasonableness and therefore do not place the supplier’s workforce at risk. – Director, Executive and Employee Training to ensure our employees understand our commitment and know how to identify risks. – Inclusion of provisions in our supply contracts requiring minimum standards in regard to health & safety, environment, anti-bribery and anti-corruption, and modern slavery. <p>In addition to the above listed actions, the following documents support our zero-tolerance stance towards modern slavery. These include:</p> <ul style="list-style-type: none"> – Whistleblower Policy – Modern Slavery Policy – Modern Slavery Procedure – Human Rights Policy – Anti-Bribery and Anti-Corruption Policy – Community Relations Policy – Code of Conduct Policy – Supplier Code of Conduct – Procurement Policy – Human Resource & Recruitment guidelines <p>Additionally, our annual Commitments were completed as listed in Section 6.</p>	<p>It is our policy not to engage with third parties where the minimum national and/or international legally required labour standards are not adhered to or where we believe, following a modern slavery risk assessment, that the third party or its suppliers engage in modern slavery (Minimum Standards).</p> <p>We will not enter into or renew any contract with a third party whose risk of modern slavery is assessed as high without evidence that the third party has in place adequate controls to manage the risk of modern slavery.</p> <p>Modern slavery questionnaires are a self-assessment tool for suppliers who can elect to complete the questionnaire. Therefore, the questionnaire communicates the organisation’s priority to not contribute to modern slavery, but also leads to the data having application limitations.</p> <p>Our audits and site visits of suppliers have indicated their workforces are not at risk of exploitation.</p> <p>We are confident that the schedules and rates negotiated with our suppliers are reasonable and commercial and do not place the suppliers’ workforce at risk of exploitation by their employer.</p> <p>We are committed to continuous improvement. We review our policies, procedures, and practices regularly to ensure they remain effective. An annual review of our modern slavery initiatives will be published to promote transparency and accountability.</p>

4.2.2. Papua New Guinea

Risk of Modern Slavery	Due diligence actions taken to address the risk	Actions effectiveness in FY23
<p>Risk profile unchanged from FY22.</p> <p>According to the 2023 Global Slavery Index, an estimated 10.3 in every thousand people were in modern slavery in Papua New Guinea at any point in 2021. In other words, an estimated 93,000 people experienced forced labour or forced marriage in Papua New Guinea in 2021. In terms of prevalence of modern slavery, Papua New Guinea ranks 20th globally and 5th within Asia and the Pacific. In FY23, 19.8% of St Barbara's global supply was from Papua New Guinea. The percentage of total supply will increase in FY24 as a result of selling the Leonora Assets in FY23 and Atlantic Operation going into care and maintenance in FY24.</p> <p>To support the communities in which we operate, we engage several local Simberi landowner organisations for the supply of goods and services. In FY22, these organisations were identified as our most significant modern slavery risk. These organisations have limited management and administrative system and tend to have low completion rates of the modern slavery questionnaires (managed by third party provider). The questionnaires completed by Landowner organisations manually for St Barbara directly indicate there is a governance risk within these organisations that could lead to an increased modern slavery risk.</p> <p>Our supply chain involves transportation and shipping of goods supplied to our sites and gold from the mine site to refineries. Depending on the nature of the goods supplied, either the supplier or we take responsibility for the shipping or freight.</p>	<p>In addition to the above listed Australian & Canadian actions, the following due diligence activities were completed:</p> <p>We worked with a number of Simberi Landowner organisations with a paper version of modern slavery questionnaires and containing content more targeted to the landowners.</p> <p>In FY23, St Barbara developed and implemented a modern slavery training module for Simberi contract owners.</p> <p>Posters were developed and placed around the Simberi operation describing what modern slavery is and the grievance process to follow if modern slavery is witnessed or experienced.</p> <p>The Simberi Operation moved to an Australian third-party logistics provider for some of its logistics activities in FY23. As part of on boarding this provider, a site visit was completed to understand the working conditions of staff.</p>	<p>Simberi Landowner modern slavery questionnaire effectiveness:</p> <ul style="list-style-type: none"> - 18 (out of 24) modern slavery questionnaires directed at Simberi Landowner suppliers were completed. - No instances of people under 17 years of age reported to be working within the Landowner organisations. - No instances reported of Landowner suppliers paying under the minimum wage of K3.50/hr, though there was varied understanding of what the minimum wage is. - The surveys were very effective in providing insight to landowner organisations modern slavery risks. A number of survey findings are discussed in section 6. and will inform the FY24 commitments. <p>Contract owner modern slavery training:</p> <ul style="list-style-type: none"> - All Simberi contract owners completed online or manual modern slavery training. <p>Working conditions of the staff at the third-party logistics provider appeared to meet Australian and St Barbara standards.</p>

5. Consultation with Subsidiary Companies

The St Barbara Modern Slavery Statement is a joint statement on behalf of itself and all of its wholly owned subsidiaries (the reporting entity) after a process of consultation. The Simberi leadership team, procurement and community relations team were engaged on matters specific to the Simberi operation. Consultation was undertaken with the group executive leadership team including key areas of the business (human resources, legal, and procurement).

6. Commitments

We are committed to continually developing and improving the effectiveness of the actions we are taking to assess and address modern slavery risks. The evaluation of effectiveness is vital to ensuring that we are on the right track and effecting meaningful change.

6.1.1. FY23 Commitments

The table below outlines the status of actions for FY23:

FY23 Actions (as per FY22 Modern Slavery Statement) Status	
1. Develop targeted modern slavery module for Simberi contract owners including remedy frameworks	Modern Slavery Training Modules were developed and all Simberi contract owners completed the training.
2. Grievance process posted publicly in PNG and revised escalation process communicated	Posters have been placed on all relevant Simberi Community Notice boards and across the Simberi Site.
3. Engage with PNG Landowner Businesses to improve survey data quality	18 (out of 24) Simberi Landowner Organisations completed Modern Slavery Questionnaires providing insight and more transparency into our modern slavery risk.
4. Review due diligence survey methodology	Ongoing.
5. Work with peers to review approach to auditing of PNG chartered shipping	Ongoing – we are currently reviewing our Simberi logistics operating model. During FY23 we partially outsourced services to an Australian third-party logistics provider. During FY24, we will continue review our approach to auditing shipping as part of our ongoing review of our logistics operating model.
6. Conduct a deep dive with key high-risk suppliers	Ongoing.

6.1.2. FY24 Commitments

The St Barbara business redirected its strategic focus during FY23 resulting in the sale of the Leonora Assets in Western Australia. In addition, the Touquoy operation went into care and maintenance in the first quarter of FY24. The commitments for FY24 will continue to focus on addressing modern slavery risks associated with the Simberi Operation. The findings from the 2023 modern slavery questionnaire directed at Simberi landowners (listed below) provides insights as to the biggest opportunities for St Barbara to reduce modern slavery risks.

FY23 Landowner Modern Slavery Questionnaire Findings:

- 18 modern slavery questionnaires directed at Simberi Landowner suppliers were completed.
- No instances of employees under 17 years of age were reported within the Landowner organisations.
- No instances of Landowner suppliers paying under the minimum wage of K3.50/hr, though there was varied understanding of what the minimum wage is.
- 7.6% of the landowner suppliers' employees were women.
- 55% Landowner suppliers either do not have a method to verify age or did not volunteer a method.
- 44% of landowner suppliers indicated they have a recruitment policy.
- 50% of landowner suppliers articulated minimum employment requirements.
- 78% of landowner suppliers either have a safety policy or indicated they use St Barbara's policy in lieu of their own.
- 50% of landowner suppliers indicated they have a code of conduct.
- 61% of landowner suppliers indicate they have safety controls in place (all St Barbara suppliers are bound to operate to St Barbara safety policies whilst on our sites).
- All landowner suppliers indicated a working day of 12hrs or less (customary in mining rosters).

FY24 Commitments	Measure
1. >90% of Simberi landowner suppliers complete modern slavery questionnaires.	Number of Surveys completed.
2. Work with landowner suppliers on governance, in particular assist with the development of the following templated policies for their adoption: <ul style="list-style-type: none"> – Recruitment policy – Safety Policy – Code of conduct – Safety controls 	Landowner governance toolkits developed and contractually mandated where landowners do not have policies in place.
3. Provide information and/or training to all landowner suppliers on modern slavery (including minimum wage).	Training module and/or information developed and distributed.
4. Review due diligence survey methodology to increase effectiveness in the eradication of modern slavery.	Increased insightfulness from survey results informing tangible commitments in the following financial year.

7. Conclusion

Modern slavery is a global challenge that requires collective effort. At St Barbara, we are strongly committed to playing our part in eradicating and removing such practices from our operations and supply chain wherever they might exist. We will be focused on making commitments that create real change in our highest areas of risk. We urge our stakeholders to join us in this endeavour.

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

