

MODERN SLAVERY STATEMENT



Purpose

This statement is made on behalf of Westgold Resources Limited (**Westgold** or **the Company**) and its wholly owned subsidiaries (**the Group**) pursuant to section 16 of the *Modern Slavery Act 2018* (**the Act**) and constitutes our Modern Slavery Statement for the financial year ended 30 June 2021 (**Reporting Period**).

The purpose of the Westgold Modern Slavery Statement is to outline the overarching principles and guidelines designed to reflect our commitment to upholding the law and respecting human rights.

Westgold respects human rights and endorses the right of all to be free from slavery, forced labour and human trafficking.

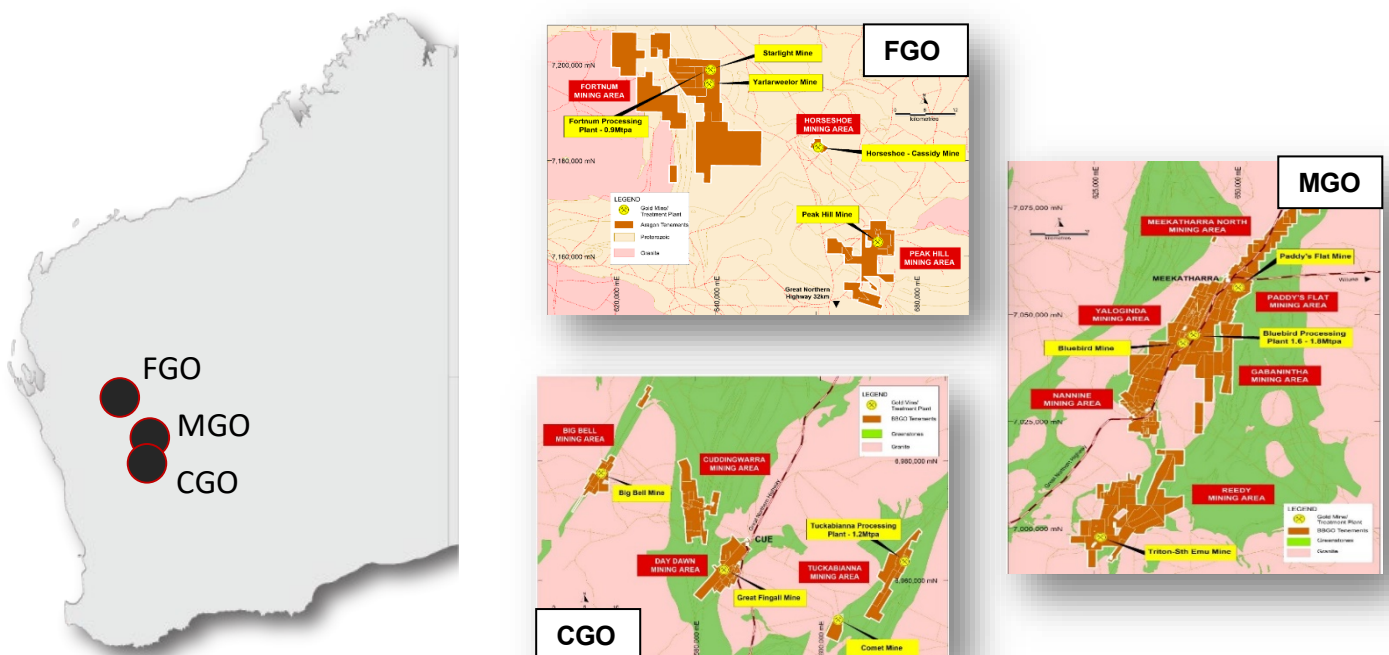
Westgold is committed to operating in accordance with our Core Values. These Core Values guide our activities and employees across our operations. They describe our culture, the way we work and what we stand for. We value our people, embrace our communities and protect our environment.

Through our Core Values we operate with integrity, respect, teamwork, passion and safety with a genuine commitment to our Corporate Governance principles.

This statement illustrates how we operate and reflects our continued public commitment to not using forced, compulsory, trafficked or child labour within our organisation and to challenge and confront the use of such labour within our supply chains.

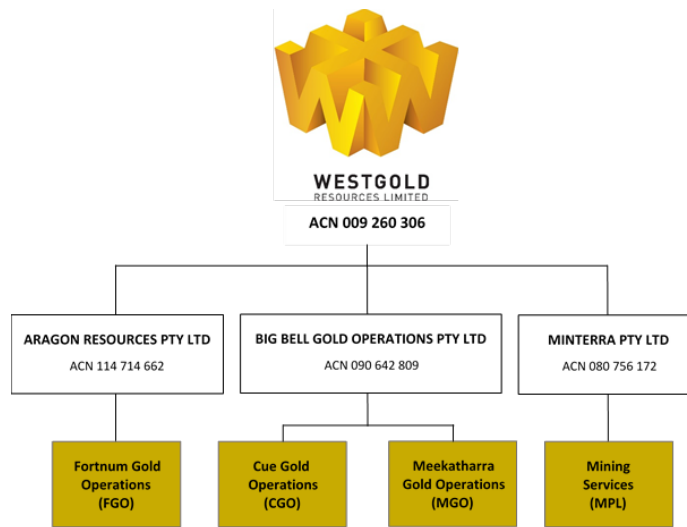
Our structure and operations

Westgold is an explorer, mine developer, operator and gold producer with a large strategic land package in the Murchison region of Western Australia. The Company has consolidated over 1,300 km² of mining titles that encompass the Fortnum Gold Operations (in the north), the Meekatharra Gold Operations (in the centre) and the Cue Gold Operations (in the south), of our Murchison portfolio.





The following organisational structure depicts Westgold's operations:



Westgold is committed to implementing policies and procedures that meet our moral and ethical obligations to identify inherent breaches of modern slavery within our supply chains by ensuring those within our supply chains are aware and warrant to us that they uphold the same standards and commitment.

We are committed to training our employees and ensuring they have an understanding and respect for how their choices can have far-reaching implications upon basic human rights.

As part of our commitment to continuous improvement, Westgold will keep developing codes of practice, procedures, risk assessments and monitoring frameworks that address the issues of modern slavery. We will continue to evolve our procurement practices to ensure our suppliers comply with all requirements of the Act to progress the eradication of modern slavery.

Modern slavery risks in our employment and supply chains

Employment

We consider the following three risk categories in relation to our employees:

- Hours of work,
- Compensation, and
- Minimum age of employees.

In Australia, we consider that the level of risk of modern slavery in our employees is low. We follow set protocols in the way we recruit people into our organisation via our recruitment practices. These include verifying qualifications, conducting reference checking and verifying the right to work in our country. We also regularly monitor and engage with our employees on issues such as work hours, overtime and pay rates to ensure that they are adequately compensated, and we monitor any excessive work patterns with strict fatigue management protocols. We do not employ people who are classified as underage except under strict apprenticeship programmes.



1. Hours of work

The concept of limited working hours as a human right was addressed in the Universal Declaration of Human Rights (Article 24) and International Covenant on Economic, Social and Culture Rights (Article 7). The statutory requirement for working hours is also covered by a number of Acts and Regulations in the Mining Industry (The Occupational Safety and Health act 194, The Occupational Safety and Health Regulations 1996, The Mine Safety & Inspection Act 1994, and the Mine Safety & Inspection Regulations 1995) as well as a Code of Practice Working Hours 2006 and Risk Management as this aspect is heavily regulated. We also maintain a specific company procedure to manage Hours of Work to ensure that the maximum allowable hours of work are not exceeded. This procedure is also coupled with a Fitness for Work Procedure and a Fatigue Management Procedure.

2. Compensation

The concept of adequate compensation is regulated by modern awards and Westgold regularly benchmarks compensation against appropriate industry standards. The Fairwork Act and National Employment Standards are referenced to ensure entitlements are appropriately administered in addition to external advice received from Industrial Relations Advisory Consultants.

3. Minimum age

Apprenticeships are governed by the WA State Training Board operating under the Vocational Education and Training Act 1996. Apprentices employed to work on Westgold sites within underground projects have a minimum age requirement of eighteen (18) years per the Mines Safety and Inspection Regulations 1995.

Apprentices are able to be employed within Westgold surface operations (i.e., fixed plant divisions from the age of sixteen (16) years). Any Apprentice employed by Westgold that is under the age of eighteen (18) years old is appointed an onsite guardian who is required to maintain contact with the Apprentice prior to and post all shifts in addition to ensuring that the Apprentice does not access any licensed areas within the camp accommodation.

Supply chains

Our supply chain comprises the following main categories and we recognise that modern slavery risks exist in each of these categories by virtue of the industry risk profiles and the globalised and often complex supply chains supporting the provision of these goods or services.

Category	Generally known modern slavery risks
Mining equipment	The Group recognises that the mining equipment supply chain has a risk of modern slavery. There are increased modern slavery risks associated with fabrication of parts and componentry as well as the risks in the labor force required for equipment assembly located in higher risk countries.
Mining consumables	The Group recognises that the mining consumable supply chain has a risk of modern slavery. There are increased modern slavery risks associated with raw materials such as timber, fabric, metals and glass as well as the risks in the manufacturing industry located in higher risk countries.



Mining services	The Group recognises that the mining services supply chain has a risk of modern slavery. The competitive tendering process may initiate utilisation of sub-contractors, agents and vulnerable workers place the suppliers in this category at greater risk of being directly linked to modern slavery.
Transport services	The Group recognises that the transport supply chain has a risk of modern slavery. The utilisation of sub-contractors and agents together with the utilisation of vulnerable workers place the suppliers in this category at greater risk of being directly linked to modern slavery.
Grinding media	The Group recognises that the importing of grinding media has a risk of modern slavery. There are increased modern slavery risks associated with forging and fabrication in the manufacturing industry located in higher risk countries.
IT equipment and software	The Group recognises modern slavery risks are present in the supply chain that provides IT companies with the necessary materials to produce electronic goods and parts. We know that the manufacture of IT equipment has also been linked to modern slavery.
Cleaning	The Group recognises that the cleaning industry is considered high-risk for modern slavery largely due to the nature of the workforce. The cleaning sector does not require qualifications in many instances and as such the workforce is often low-skilled and not fluent in the local language.
Hospitality and food services	The Group recognises that food-related supply chains have a high risk of modern slavery. These risks are associated with suppliers, producers, distributors and caterers.
Facility maintenance	The Group recognises that the facility maintenance supply chain has a high risk of modern slavery. The prevalence of sub-contracting in the facilities maintenance industry can lead to contractual liabilities and obligations diminishing to the point where the human rights of worker on sites may not be noticed.
Corporate merchandise	The Group recognises the corporate merchandise supply chains have a high risk of modern slavery. The higher risk of modern slavery in the supply chains supporting the garment industry is well documented. The same can be said of the mass-produced items manufactures in higher risk countries with components from numerous locations.
Postal and courier delivery services	The Group recognises that the delivery service supply chain has a risk of modern slavery. The utilisation of sub-contractors and agents together with the utilisation of vulnerable workers place the suppliers in this category at greater risk of being directly linked to modern slavery.



Furniture	The Group recognises that the furniture supply chain has a high risk of modern slavery. There are increased modern slavery risks associated with raw materials such as timber, fabric, metals and glass as well as the risks in the manufacturing industry located in higher risk countries.
Travel services	The Group recognises that the travel services supply chain has a risk of modern slavery. Although global travel management services are typically the first-tier suppliers for large companies, hotels and airlines inevitably from part of the supply change for purchases of travel services. The vulnerable workforce supporting these industries together with the complex supply chains result in a greater modern slavery risk.

Impact of COVID-19

We have had to make some changes to the way we operate in response to the COVID-19 pandemic, including as a result of government restrictions and reduced access to overseas products due to shipping delays. We have however not observed any additional modern slavery risk in our operations or supply chain emerging as result of the COVID-19 pandemic. We were able to continue our due diligence processes during the Reporting Period.

Due diligence processes and steps taken to assess and manage modern slavery

As a gold producer, purchase of goods and services and an employer, we recognise our responsibility under the UN Guiding Principles on Business and Human Rights in all areas of our operations. Accordingly, we have developed due diligence process to assess, mitigate, prevent and manage the risk of modern slavery across all levels of our Group.

Employment

We are committed to combatting modern slavery in all forms, and we strive to identify any actual or potential modern slavery risk occurring within our operations. An overview of the measures we have in place to assess and manage modern slavery is set out below.

All employees are expected to comply with our Core Values. These principles are embedded in our organisation and supported by our policies and communicated to new employees on commencement.

We operate under a Code of Conduct (**the Code**) which guides and enhances the conduct and behaviour of our directors, officers, employees and sub-contractors in performing their everyday roles.

The Code encourages and fosters a culture of integrity and responsibility with the focus of augmenting our reputation as a valued employer, business partner and corporate citizen, in all our relationships.

The Code underpins the way our Company wishes to operate and should be understood and abided by all concerned.



We have established a Remuneration Framework which is designed to ensure our people are paid, fairly competitively and based on merit. Our remuneration strategy is designed to attract high calibre talent in the market, reward employees for demonstrating the right behaviours and motivate people to achieve the organisation's goals and objectives.

Westgold is committed to the highest standards of conduct and ethical behaviour in all of our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

Westgold fosters a supportive environment encouraging our people and others to speak up and to report information concerning misconduct, or impropriety involving our operations. We have implemented processes and procedures affording protection and support to someone making a report under our Whistleblowing Policy, so that they may do so fear of intimidation, disadvantage or reprisal.

Westgold maintains a Mental Health Policy whereby we are committed to mental health and wellbeing of employees and where we endeavour to create a workplace where people are able to find help and support. The objectives include helping the workforce to manage mental health issues by building and sustaining a supportive, safe and healthy work culture, providing access for employees and their families to independent, complimentary and free employee assistance programs, developing workforce awareness of mental health issues and promoting positive mental health by providing adequate information, training and support.

Supply chains

As a purchaser of goods and services, we:

- strive to respect human rights in supplier procurement though being committed to engaging suppliers who respect human rights and share our commitment to high ethical standards; and
- seek to make contractual arrangements with supplier that promote the principles contained in our Human Rights Policy and our Supplier Charter.

Through awareness and knowledge of our supply chains and a desire to nurture local and regional economic output we attempt to eliminate exposure to suppression of human rights. Our expectation is that our suppliers uphold, endorse and drive our standards downstream through their own supply chains to ensure issues related to Modern Slavery as defined by the Act.

On a periodic basis, we review and revise our internal procedures to improve the way we assess, address, mitigate and prevent the risks of modern slavery occurring within our supply chain. We do this in recognition of the fact that striving to do better is the only way to bring about impactful change in the way we embed human right considerations in our procurement processes.

We intend to update our Supplier Contracts Policy to formalise the processes across our operations.

We will be asking all our suppliers to confirm in writing their compliance with our Supplier Charter which will set out our expectation of supplier in respect of anti-bribery and corruption, diversity and inclusion, health and safety, sustainability and human rights.



We will be expecting our supplier to comply with all applicable human rights related laws in respect of their employees, conduct of their business activities.

We intend to conduct due diligence on our suppliers and are committed to not using suppliers who may be linked to modern slavery risks.

Assessing the effectiveness of our actions

During the course of the next reporting period, we will seek to review, monitor and embed our processes by:

- Incorporating business and human right considerations throughout our operations;
- Enforcing the Supplier Charter;
- On boarding suppliers through a virtual systemic platform assisting enforcement of standards;
- Assessing our supplier's commitments to human rights or modern slavery;
- Considering the modern slavery statements of our suppliers and prospective suppliers when making procurement decisions; and
- Monitoring the reporting channels for instance of human right impacts in our operations and supply chains.

Other relevant information

In the Reporting Period, we are also focussed on the changing ESG landscape including Business Human Rights, which we believe forms an integral part of the sustainability agenda.

We will engage with experts in the field of Business Human Rights and will seek to play a role in Anti-Slavery initiatives.

No specific matters have been brought to our attention to date to indicate any contravention by the Company.

Consultation and approval

This statement was prepared by Management in consultation with our Board of Directors.

The Board of Directors have approved this statement on behalf of the Westgold on 30 August 2021.

A handwritten signature in black ink, appearing to read 'Peter Cook', written in a cursive style.

Peter Cook
Chairman