

Anti-Modern Slavery Policy

Our aim is to eliminate modern slavery within our operations and supply chain.

1. Our commitment

We are committed to complying with all legal obligations and maintaining high standards of ethics and integrity in all our dealings.

2. Our approach

We will continually improve our processes and practices year-on-year to support the elimination of modern slavery within our global operations and supply chains.

3. Our principles

We will:

1. Comply with applicable legislation that supports the elimination of modern slavery wherever we operate. If this Policy goes beyond local laws, we will operate in accordance with the Policy. If the Policy conflicts with local laws, we will follow local law while operating in accordance with the Policy wherever possible.
2. Ensure our personnel 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.
3. Remunerate our employees appropriately and in accordance with the minimum wage in the jurisdictions in which we operate.
4. Provide education and training to our employees on identifying indicators of modern slavery and assess our operations for modern slavery risk on an annual basis.
5. Ensure our suppliers comply with this Policy, and other related policies, our Supplier Code of Conduct and uphold our commitment to eliminating modern slavery practices in relation to their own operations and supply chains.
6. Work with our suppliers to identify and manage the risk of modern slavery within their operations and supply chain.
7. Require our suppliers to conduct regular due diligence of our supply chain to identify and address any actual or potential risks of modern slavery.
8. Work with our personnel and affected persons (where appropriate) to provide effective remedies in the event we directly cause or contribute to modern slavery.
9. Provide access to our whistleblower system to all relevant stakeholders including our employees and our suppliers.
10. Ensure all stakeholders involved with our business are equipped to report known or suspected cases of modern slavery, violations of this Policy, the Supplier Code of Conduct or other relevant ethical standards.
11. Submit an annual statement detailing how modern slavery is assessed and addressed in our operations and supply chains.

4. Responsibilities and accountabilities

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

This policy will be reviewed at least biannually and updated as required.

The Managing Director is responsible for ensuring that this policy is implemented.

COMMERCIAL-IN-CONFIDENCE

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