



# Wiluna Mining Corporation

## Modern Slavery Statement 2021



## CONTEXT

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### Addressing Modern Slavery

Wiluna Mining Corporation Limited (Wiluna Mining) is committed to ensuring its activities and supply chain are not linked to Modern Slavery and to address or mitigate such risks. Wiluna Mining continues to develop its systems and guidance, on the protection of Human Rights and the prevention of Modern Slavery, in its work and for procurement from key Suppliers and Service Providers. These expectations will be communicated directly to related parties or be viewable on the website of Wiluna Mining.

The term Modern Slavery is used to describe situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom. Modern Slavery describes serious exploitation of people. It does not include practices like substandard-working conditions or underpayment of workers. These practices are also illegal and harmful and may be present in some occurrences of Modern Slavery. These practices may escalate into Modern Slavery if not addressed. The Australian Modern Slavery Act 2018 (the Act), defines Modern Slavery as including eight types of serious exploitation:

1. Trafficking in persons
2. Slavery
3. Servitude
4. Forced marriage
5. Forced labour
6. Debt bondage
7. Deceptive recruiting for labour or services
8. The worst forms of child labour.

### About this Statement

In view of requirements of the Australian Modern Slavery Act 2018 (the Act), Wiluna Mining must publish a Modern Slavery Statement, annually and describe its actions to assess and address Modern-Slavery risks. This Modern Slavery Statement:

- addresses the mandatory criteria prescribed by the Act
- is approved and signed by a Board member of Wiluna Mining
- is provided to the Commonwealth Government
- considers learnings and continual improvements in future Modern Slavery Statements.



# 1 THE STATEMENT

## 1.1 Reporting Entity

Wiluna Mining Corporation Limited (Wiluna Mining) ABN 18 119 887 606 18 is the reporting entity. It is a Perth based, ASX-listed company, which owns 100% of the Wiluna Mining Operation, in the Northern Goldfields of Western Australia. There are no Joint Venture Partners in the Wiluna Mining Operation. The Registered office of Wiluna Mining is Level 3, 1 Altona Street, WEST PERTH, WA.

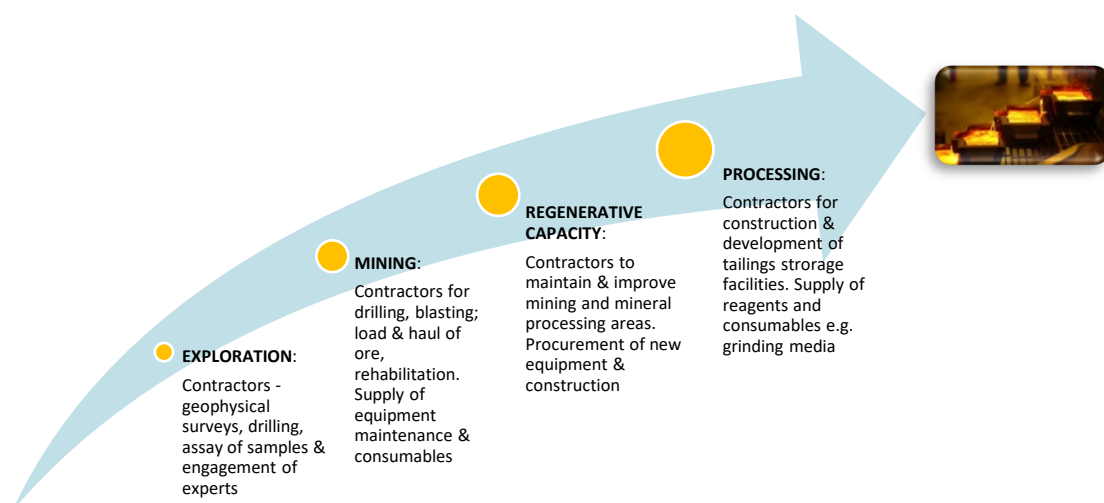
## 1.2 Operation and Supply Chains

The Wiluna Mining Operation processes ‘free milling’ ore from reserves at the Lake Way (Williamson) open-pit mine and the Wiluna - Golden Age underground mine. At present gold doré is produced on site. On shipping from site, the gold becomes the property of the customer. Wiluna Mining is not involved in any Joint Venture for the production of gold doré.

The supply chain for the mining and mineral processing operation of Wiluna Mining, includes a range of services and materials such as, but not only:

- electrical power, diesel fuel
- consumables or reagents from explosives to sodium cyanide
- heavy duty through to ‘IT’ equipment, personal protective equipment (PPE) and workplace clothing
- service contracts for the deployment of skilled personnel, in surface and underground mining, earthmoving, engineering, supporting professions, catering and servicing of site accommodations.

The phases of exploration through mining to production of gold doré are supported by a supply chain as shown in Figure 1.



**Figure 1 Support of Operation - Supply of Materials and Services**

### 1.3 Risks of Modern Slavery Practices in the Operation and Supply

Wiluna Mining considers it has a relatively low risk of exposure to Modern Slavery as its operational activity is only in Australia. For example, Wiluna Mining has considered the risks of engaging contractors and their employees to undertake cleaning and catering services at site. These personnel are employed under National Employment Standards and a relevant Modern Award. Some IT equipment, Personal Protective Equipment (PPE) or workplace clothing used by Wiluna Mining, may have been manufactured offshore, and it is procured from local suppliers which support much of the mining industry in Australia. Some equipment and engineered fabrication may also be sourced from overseas.

Wiluna Mining has few roles for unskilled, temporary, or seasonal labour. All personnel working at the Wiluna Mining Operation are inducted. The General Induction makes personnel aware of their Human Rights, Modern Slavery risks, and access to the Grievance mechanism for themselves and others. Children are not permitted to work or reside at site in accordance with mining regulations.

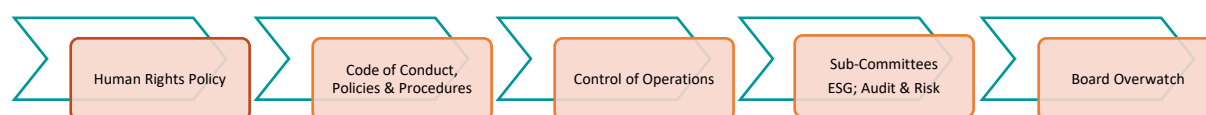
The working hours of all personnel are closely monitored and lengthy or excessive hours (absent of a high risk of fatigue) may only be permitted by Senior Management and for extenuating circumstances.

No personnel reside permanently at the Wiluna Mining Operation. Site accommodations are not guarded and personnel are free to arrive or leave.

Suppliers are chosen from a range of criteria, for provision of services or materials, through comparison of other tenders, for practicable estimates of timing, cost and application of terms and conditions prescribed in their contracts.

### 1.4 Actions to Assess & Address Modern-Slavery Risks

The Environmental, Social and Governance (ESG) framework of Wiluna Mining is crucial in the delivery of its Vision and Values. Wiluna Mining values transparency, being open, honest in its communications with shareholders and stakeholders. The Charters, Policies and Procedures of Wiluna Mining may be found at the company website under the ‘About’ tab. These show its commitments to good governance and addressing risks such as those related to Modern Slavery. The ‘Governance Framework to Address Modern Slavery’ at Wiluna Mining is shown in Figure 2.



**Figure 2 Governance Framework to Address Modern Slavery**

The Board of Wiluna Mining has oversight of ESG performance, practices and systems, through feedback from its subcommittees, reporting, audits, site visits and scrutiny of the supply chain. Review mechanisms for this ESG framework, are in place at Wiluna Mining, for consultation and due diligence.

Wiluna Mining considers the interests of its stakeholders and some with a keen interest in Human Rights, or actions to prevent Modern Slavery (Figure 3). This may occur via regular meetings or through informal contact.



**Figure 3 Stakeholders**

Wiluna Mining maintains its awareness of trends and concerns which may relate to Human Rights and or Modern Slavery through its participation in industry groups and forums.

## 1.5 Wiluna Mining Operation

The company-ESG framework includes good-industry practices, in its employment of people and liaison with Communities of Interest, to maintain a low risk of Modern Slavery, at the Wiluna Mining Operation.

The minimum terms and conditions for employment by Wiluna Mining are governed by Western Australian and National Employment Standards. Employees of site-based contractors e.g. for mining services and catering are also subject to Western Australian and National Employment Standards.

Wiluna Mining employs and sponsors individuals on visas. To fulfil the requirements of this process, Wiluna Mining must ensure and provide evidence that individuals being sponsored, are paid in line with an Australian resident, who is also employed by Wiluna Mining in the same role. Assessments are made to ensure applications and visa information is correct and the contract is in line with the requirements of the individual's visa. Personnel are not required to give custody of any original copies of personal documents to the company.

## 1.6 Engagement of Suppliers and Service Providers

Wiluna Mining has a formalised and open tendering process. Bidders are evaluated to identify the 'best value' option for criteria such as cost, capability, good performance and standards, especially in safety, and through reference checks. Bidders for key contracts will be required to complete the Modern-Slavery Questionnaire.

Suppliers are chosen from a range of criteria for provision of services or materials through comparison of other tenders for practicable estimates of timing and cost. It is not necessary to engage suppliers which deliver at the lowest cost, nor within unrealistic and short timeframes. Approval for registration of new suppliers and service providers to Wiluna Mining, requires an assessment of their risks, such as safety and environmental issues, capability and commerciality. During the review period Modern Slavery was added to these criteria. The assessment process for new suppliers is under regular review, to enable a more informed assessment of Modern Slavery risks.

Wiluna Mining prescribes terms and conditions to the contracts in its supply chain. These are in place to ensure fair treatment, or competition of suppliers, or service providers. These terms and conditions also make clear Wiluna Mining requirements to prevent Modern Slavery.

## 1.7 Assessment of Effectiveness in Managing Modern-Slavery Risks

Wiluna Mining relies on a wide range of suppliers and services. Approximately >95% of the Group's recent annual spend in its supply chain was from within Australia, of which approximately >90% were from within Western Australia.

There is the potential for Modern Slavery to exist in the supply chain to Wiluna Mining through the direct or indirect procurement of materials or services from overseas. To control the risks of being directly involved in modern slavery practices, Wiluna Mining has focussed on its key Suppliers and Service Providers, by requesting their completion and return, of a questionnaire for work related to:

- Accommodation services
- Drilling or Mining
- Supply of reagents for Mineral Processing
- Provision of electrical power, diesel and natural gas
- Mineral testing
- Supply of PPE & work clothing.

Based on expenditure and the materials or services provided to support its mining cycle and production of gold doré, Wiluna Mining considers it has a low risk of Modern Slavery in its immediate-supply chain.

### 1.7.1 Supply Chain Feedback

Wiluna Mining has not identified any occurrences of Modern Slavery in its operations or supply chain for the financial-reporting period of 2021. Key notes from returns to the Modern Slavery questionnaire by our supply chain include:

- 26 principal suppliers and service providers (80% of total cost base) were asked to respond.
- Most suppliers and services which provide Modern Slavery Statements according to the Act, commit to the prevention of Modern Slavery:
  - through Human Rights policies' and or
  - prescription in their Codes of Conduct.
- Most respondents have a whistleblower policy, but its accessibility is not always obvious.
- Some respondents have upstream-supply chains overseas:
  - Those related to Thailand and Malaysia have good awareness and controls in place.
  - One service provider, sources equipment from China, another from India and Japan.
  - We will follow up with these respondents about their:
    - verification of adequate preventative measures and controls for the prevention of modern slavery in their upstream supply chains and
    - contingencies in key aspects of upstream supply chains.
- Some suppliers provide a myriad of parts and consumables items but provide few details on the origins for the upstream suppliers and these may also be worthy of follow up.
- The service provider for site accommodations and catering provided a good response and its Modern-Slavery Statement. It has oversight of people employed through agencies and looked into the countries of origin and risks, for its upstream suppliers, to avert concerns.
- A supplier and maintainer of major equipment reports against the Act. It shows transparency of its employee induction process, delivers focused training and awareness of Modern Slavery for key and influential roles and scrutinises prospective and existing participants in its supply chain.
- Some of our suppliers also have good screening for new participants in their supply chains.

## 1.8 Process of Consultation with any Entities owned or Controlled

The Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities is noted. Wiluna Mining executives and Board members are aware of the Act and accountabilities to manage the risks of Modern Slavery within the operation and supply chain. Key roles have been consulted on managing risks of Modern Slavery. These roles are in Human Resources, Finance, Procurement, Legal, Risk, Environmental, Social and Governance (ESG), Major Projects and Senior Leadership.

## 1.9 Other Relevant Information

Wiluna Mining is revising the protocols for screening new providers in its supply chain. Terms and conditions are also being revised for suppliers and service providers. Both initiatives aim to improve oversight of risk management for Modern Slavery in our supply chain.

Wiluna Mining will continue to develop its public reporting on the prevention of Modern Slavery.

## 2 SUBMISSION AND PUBLISHING

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- This Statement is approved by the Board of Directors of Wiluna Mining Corporation Limited (being the principal governing body for the reporting entity) and signed on its behalf by the Executive Chair.
- The Statement is provided to Australian Border Force.
- Wiluna Mining publishes related documents on its website.

  
Milan Jerkovic

EXECUTIVE CHAIR

**Wiluna Mining Corporation Limited**

14 December 2021