



OCEANAGOLD

2022

Modern Slavery Statement



About this statement

Reporting Entities

This is a joint statement by OceanaGold Corporation (ARBN 50 124 980 187) (OceanaGold) and Oceana Gold Pty Ltd (ABN 56 107 488 200) (OGPL) (together the Reporting Entities). OceanaGold is the parent company of the OceanaGold Corporation group of Companies (Group) and both OceanaGold and OGPL are Reporting Entities under the Modern Slavery Act 2018 (Cth) (Australian Modern Slavery Act).

This Statement covers the reporting period from 1 January 2022 to 31 December 2022.

All references in this statement to “we”, “us”, “the Group” and “OceanaGold”, refer to OceanaGold and its subsidiaries as a Group, unless otherwise stated.

Consultation

The drafting of this Statement was led by the Business Integrity team with input from representatives from our operations and offices, across Commercial, Finance, Procurement, Legal, External Affairs and Social Performance and Health, Safety and Environment.

The Executive Leadership Team (ELT) of OceanaGold and General Managers (GMs) of each operation also reviewed this Statement. The ELT comprises of the President and Chief Executive Officer and Executive Vice Presidents (EVPs) who are responsible for the management of the Group. The GMs of each operation report to the Chief Operating Officers who are members of the ELT. Some ELT members and GMs are directors of our Reporting Entities and their operating subsidiaries. Accordingly, the ELT and GMs have facilitated consultation between the Reporting Entities and across our controlled entities.

Approval

This Statement was approved by the Board of OceanaGold Corporation on 11 May 2023 on behalf of the Reporting Entities.



Gerard Bond,
President and Chief Executive Officer

Contents

- About this statement 1
- Modern Slavery Act: Mandatory criteria 2
- A message from our CEO 3
- Our structure and operations..... 4
- Our supply chain 7
- Our modern slavery risks11
- Actions to assess and address modern slavery risks.....14
- Assessing effectiveness20
- Looking ahead.....21

Modern Slavery Act: Mandatory criteria

Criteria	Section
Mandatory Criteria 1: Identify the reporting entity	About this statement
Mandatory Criteria 2: Describe the structure, operations and supply chain of the reporting entity	Our structure and operations Our supply chain
Mandatory Criteria 3: Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Our modern slavery risks
Mandatory Criteria 4: Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Actions to assess and address modern slavery risks
Mandatory Criteria 5: Describe how the reporting entity assesses the effectiveness of such actions	Assessing effectiveness
Mandatory Criteria 6: Describe the process of consultation with any entities that the reporting entity owns or controls	About this statement
Mandatory Criteria 7: Any other information that the reporting entity considers relevant	Looking ahead A message from our CEO



Former tailings storage facility, now an alpine wetland at the Reefion Restoration Project



A message from our CEO

I am pleased to present this Modern Slavery Statement, our third in accordance with the Australian Modern Slavery Act.

At OceanaGold, our Purpose is mining gold for a better future. Our Vision is to be a company people trust, want to work and partner with, supply and invest in, to create value. That Vision is brought to life by our Company Values – Care, Respect, Integrity, Performance and Teamwork – that put the safety and wellbeing of our people, communities and environment at the forefront of the decisions we make.

Modern slavery exploits vulnerable people and abuses their basic human rights. It goes against our Values and our commitment to respecting the human rights of everyone impacted by our business and throughout our value chain.

This Modern Slavery Statement outlines our work during the 2022 calendar year, to better understand, manage and reduce our potential exposures to modern slavery risks in our operations and our supply chain. It has been developed by members of our Responsible Supply Chain Working Group, in consultation with external subject matter experts, reviewed by our Executive Leadership Team and approved by the Board of Directors.

We are always looking for opportunities to improve and in 2023 and beyond we will continue to mature our approach and framework to further-reduce modern slavery risks in our operations and supply chains. This will include the implementation of a Company-wide system to manage supplier business integrity risks and enhanced supplier due diligence, onboarding and whistle-blower mechanisms.

At OceanaGold, we recognise modern slavery is a challenge best tackled by collective action. Together, with our business partners and suppliers, we can create a better future for all.

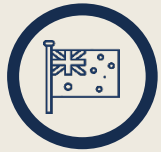
Gerard Bond

Chief Executive Officer

Our structure and operations

Our structure

OceanaGold Corporation is the parent company of the Group. OceanaGold Corporation is incorporated in Canada and trades on the Toronto Stock Exchange (TSX: OGC). The Group's key operational assets are held under the following wholly owned entities:



Oceana Gold Pty Ltd (OGPL)

Incorporated in Australia
and holds the Group's
interests and operations in
New Zealand



OceanaGold (Singapore) Pte. Ltd.

Incorporated in Singapore
and holds the Group's
interests and operations in
the Philippines



Romarco Minerals Inc.

Incorporated in Canada
and holds the Group's
interests in the United
States

There are a number of other entities in the OceanaGold Group including management companies, holding companies and subsidiaries. Our Annual Information Form on our [website](#) provides a full breakdown of the company structure.

Our operations

Our operations include Haile Gold Mine, Didipio Mine, Waihi Operation and the Macraes Operation. Our activities include exploration, development, and the mining and processing of gold, copper and silver. We own and operate open pit and underground mines, the ore from which is processed at our on-site processing plants to produce gold and silver doré bars that are transported to refineries and sold. The Didipio Mine also produces a copper-gold concentrate.

Our site operations are supported by dedicated Geology, Health & Safety, Environment, People & Culture, Legal, External Affairs and Social Performance, Information Technology, Mining, Processing, Asset Management and Commercial teams. Our corporate offices in Vancouver, Brisbane, Melbourne, Dunedin and Singapore provide strategic, systems, governance and execution support for operations and their support functions.





Our other investments and projects

OceanaGold's operations also include a number of development projects and investments outside of our core assets. This includes participation in joint ventures and minor interests in other listed and unlisted companies.

Our current projects include:

- Waihi North Project which includes potential development of the Wharekirauponga underground mine
- A Project Deed (100% owned) with Tasman Mining Limited for the development of the Blackwater deposit project in the South Island of New Zealand
- Reefton Restoration Project in New Zealand.

Our portfolio of investments include:

- Minor interests in NuLegacy Gold Corporation (8.45%) and TDG Gold Corp (2.08%) publicly listed gold exploration companies conducting exploration activities in Nevada and Canada respectively¹
- An interest (18.1%) in Sam's Creek project in New Zealand's South Island.

Further information in relation to OceanaGold's portfolio is contained in our Annual Information Form 2022, available on our [website](#).



Processing Plant at Didipio

¹ Interest disclosures as at 28 April 2023.

Our supply chain

Our supply chain roadmap

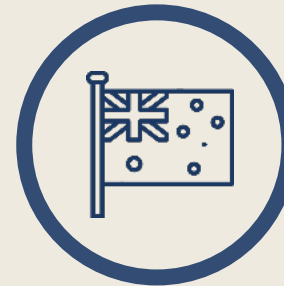
The diagram outlines the principal elements of the mining life cycle in relation to our supply chain.



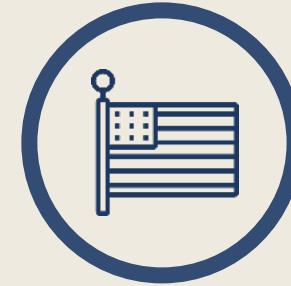
Mining Truck, Macraes

Refineries

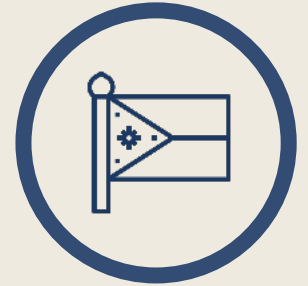
In 2022, gold doré produced from the Macraes operation was transported to The Perth Mint Australia (Perth Mint), Perth, Western Australia, while the gold doré produced from Waihi was transported to ABC Refinery in NSW. Didipio doré was directed to both ABC Refinery and The Bangko Sentral Ng Pilipinas (BSP) Refinery in the Philippines. Doré produced in the United States of America (USA) was transported to Metalor Technologies USA Corporation (Metalor), Boston, Massachusetts. All gold doré was refined and cast into London Bullion Market Association Good Delivery Standard bars and marked with the refiner stamp. The gold is then sold to financial institutions and/or the refineries. We have a commercial offtake agreement with Trafigura Group Pte. Ltd. (Trafigura) for the copper-gold concentrate produced in the Philippines.



ABC Refinery & Perth
Mint
Australia



Metalor
**United States
of America**



Trafigura & The Bangko
Sentral Ng Pilipinas
Philippines

The Perth Mint, ABC Refinery, Metalor and Trafigura are all committed to responsible sourcing. Their policies, setting out their socially responsible practices, are available on their websites.

Our suppliers

The procurement of goods and services at OceanaGold is executed by combination of operationally based commercial teams, with support from legal professionals, and a centralised Group Procurement team who provide guidance and support for operational procurement and manage global procurement initiatives. Governance of procurement, specifically procurement policies and procedures such as the Group Procurement Standard, is also centrally managed.

In 2022, we engaged 3,412 Tier 1 suppliers representing a 12.9% increase from the year prior. This increase is mainly due to 2022 covering a full year of operations at Didipio and commencement of developing the underground mine at Haile.

Tier 1 suppliers by location

The map below provides a high-level view of where our suppliers are based. These countries are shaded gold, and for illustrative purposes, the top four countries with the highest volume of suppliers have been named on this map.



3,412 Tier 1 suppliers



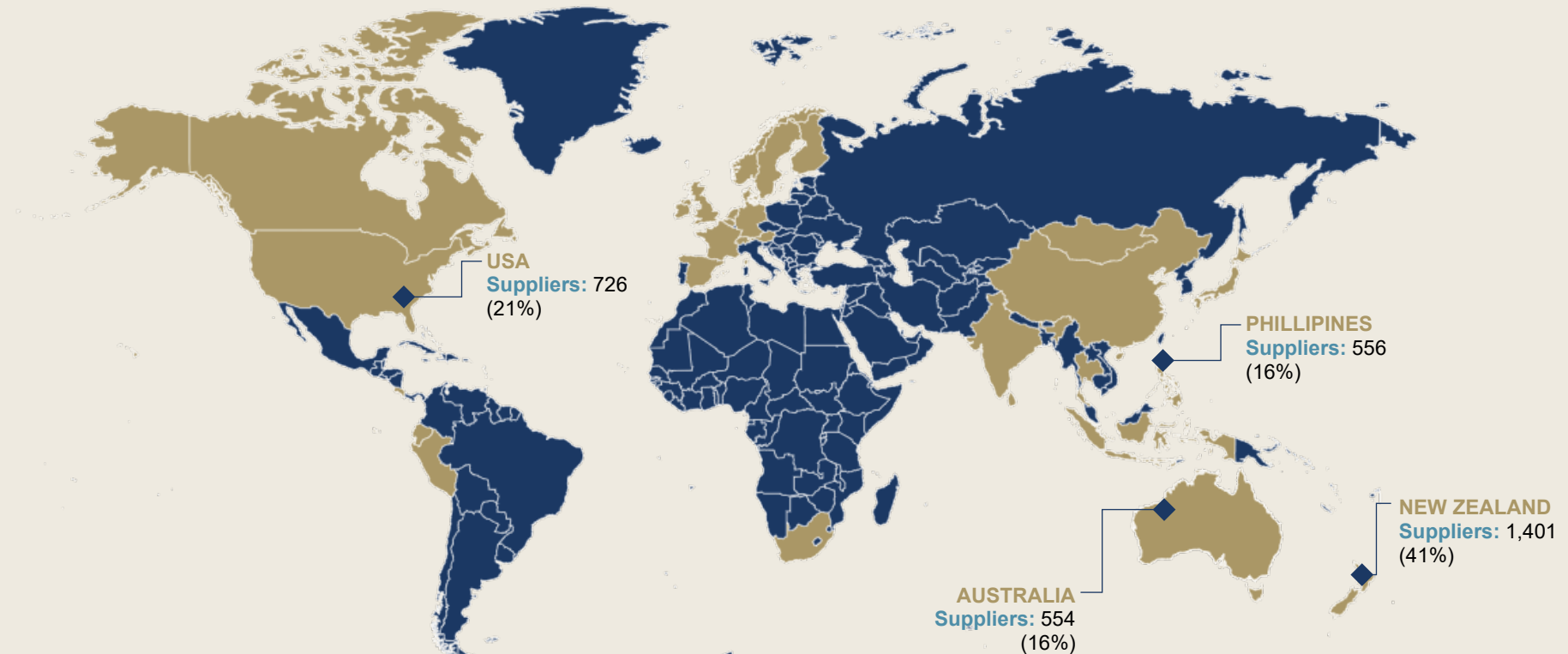
57% spend across four industries



102 Industries

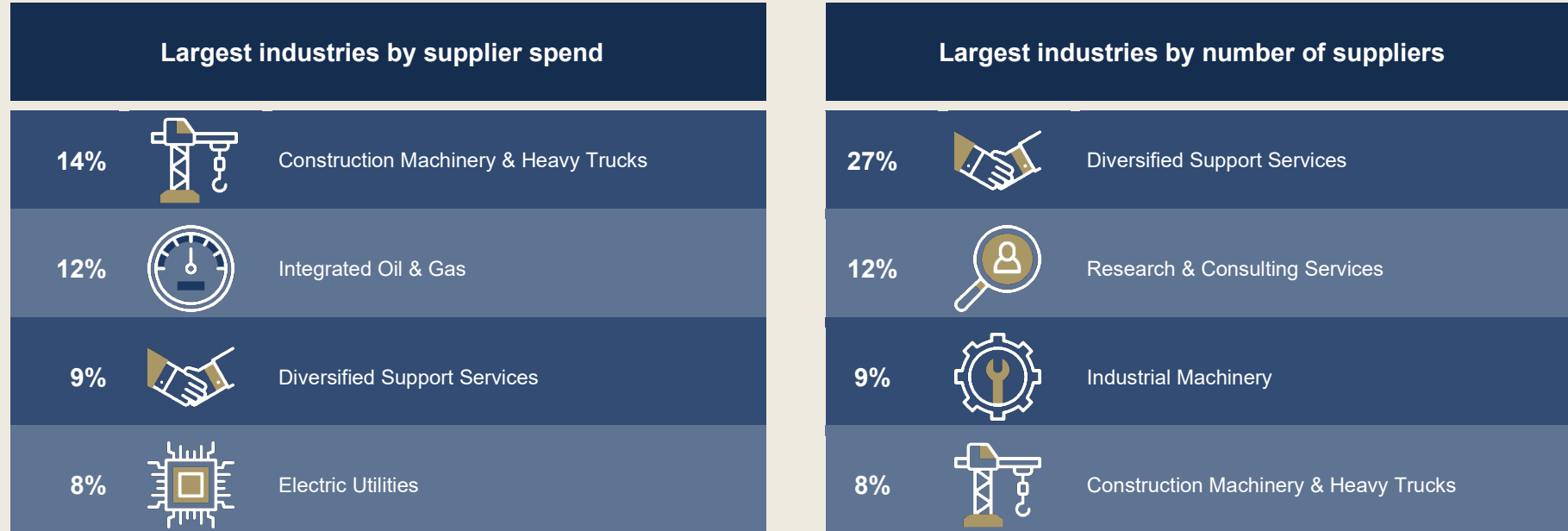


32 Countries of suppliers



Tier 1 suppliers by industry

The largest industries² within our portfolio during 2022 were:



The number of Tier 1 suppliers in the Diversified Support Services category increased 30% relative to the prior year with an overall increase of 226 suppliers categorised as Diversified Support Services. The majority of these suppliers were across Corporate, Didipio and Haile sites. Analysis indicates a significant amount of minor spend in this category with less than 14% of suppliers having a spend of \$100,000 or more.

² We use the Global Industry Classification Standard sub-industry definitions to identify the categories.

Our modern slavery risks

Risks in our operations

We recognise that by the nature of our business and the jurisdictions in which we conduct our business, there is a risk that our operations could cause, contribute to, or be directly linked to, modern slavery. Potential modern slavery risk exposures in our operations are a focus of the Human Rights Impact Assessments (HRIA) we conducted for each our operations as described in the **‘Actions to assess and address modern slavery risks’** section below.

The inherent modern slavery risks of our operations include:

- Employees/labour – a risk of “causing” or “contributing to” modern slavery if any of our employees or temporary workers were in exploitative situations. We understand this risk is heightened when our employees are in countries with higher modern slavery risks, in particular the Philippines.
- Community – a risk of “contributing” or being “directly linked” to modern slavery if our activity contributes to modern slavery in the community.
- Investments – a risk of being “directly linked” to modern slavery through our investments if our investees are themselves involved in modern slavery.

There have not been any modern slavery issues identified in any of the operational HRIAs. Furthermore, there are no material changes in the standards we adhere to or the nature of our operations (including supply chain) which impact the findings of our HRIAs.

In addition to HRIAs, the Responsible Gold Mining Principles (RGMP) assurance process completed in 2022 did not identify any non-conformance issues, including in respect of Human Right policies and practices encompassing modern slavery.

OceanaGold completed all RGMP action plans and an internal self-assessment, leading to the completion of an independent external RGMP Year 3 assurance audit which included:

- A detailed review of Company policies, systems, processes and document management at Corporate Offices.
- A site verification visit at the Didipio Mine that included testing the implementation of Company systems through observations of activities, site tour, interviews of process owners, employees, contractors, and a review of documentation and records. In addition, the site verification included confirmation of Didipio’s systems and process conformance to the Conflict Free Gold Standards.
- Supplementary conformance testing of various RGMP’s from our other operating sites.

This audit concluded OceanaGold is in conformance with the RGMPs.

Risks in our supply chain

We consider our most significant risk of potential exposure to modern slavery practices to be indirect links through our supplier relationships. To assess our inherent risk exposure³ we reviewed our Tier 1 suppliers to identify their business criticality, total spend, country of operations and industry type. In March 2023, Ernst & Young (EY) supported us to analyse our 2022 supplier data against:

- Geographic Risk & Industry Risk - Assessed using databases, indexes, and reports from internationally recognised bodies, including the International Labour Organization, United Nations Development Program, and the World Bank as well as taking into account common risk factors in each industry.
- Controversy Assessment - Completed a media and literature review on 158 GICS Sub-Industries for the past ten years. The scale and impact of the identified controversy, or the number of instances, is used to determine a controversy risk score for each risk and GICS industry combination.

These risk factors were then used to assess our Tier 1 suppliers against the following modern slavery risks:



Forced labour
(including debt
bondage)



Child labour



Human trafficking

For 2022, 14% of Tier 1 suppliers were assessed as a high inherent risk for modern slavery compared to 9% for 2021.

This difference is largely driven by the 59% increase in the number of Tier 1 suppliers at Didipio during 2022, following recommencement of operations in November 2021. Philippines is our operating country with the highest inherent risk of modern slavery.

³ In this statement, the inherent risk is defined as the amount of risk carried at a high level without individually reviewing each supplier and the relevant controls that have been applied to them.

Modern Slavery – Overall inherent risk ratings	
14%	High Risk
42%	Medium Risk
43%	Medium Low Risk
1%	Low Risk

Given the size of the medium category, a “medium low” rating was introduced to provide context on where the suppliers fit within the medium rating scale. A review of the high risk category indicates:

- 47% of Tier 1 suppliers with a high inherent risk for modern slavery are providing Diversified Support Services
- 85% of Tier 1 suppliers with high inherent risk are concentrated in the Philippines
- 12% of all Tier 1 suppliers assessed as high inherent risk for forced labour
- 10% of all Tier 1 suppliers assessed as high inherent risk for human trafficking
- 4% of all Tier 1 suppliers assessed as high inherent risk for child labour.

Tier 1 suppliers geographic risks

As part of the inherent risk assessment the following ten countries were identified, through independent indexes, as the highest risk countries for modern slavery within our Tier 1 supply chain.

- | | |
|--------------------------------|---------------------------------|
| 1. Philippines (382 suppliers) | 6. United States (11 suppliers) |
| 2. China (12 suppliers) | 7. Costa Rica (1 supplier) |
| 3. Mongolia (1 supplier) | 8. Hong Kong (1 supplier) |
| 4. South Africa (1 supplier) | 9. Peru (1 supplier) |
| 5. Singapore (6 suppliers) | 10. India (1 supplier). |

Tier 1 supplier industry risks

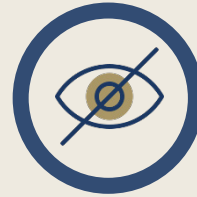
We recognise that we engage with several industries with a high-modern slavery risk as a result of the nature of our business. The heightened inherent industry risk is driven by the presence of known risk factors and controversies within these industries. These include, but are not limited to, the following:



Low skilled
manual work



High
prevalence of
migrant labour

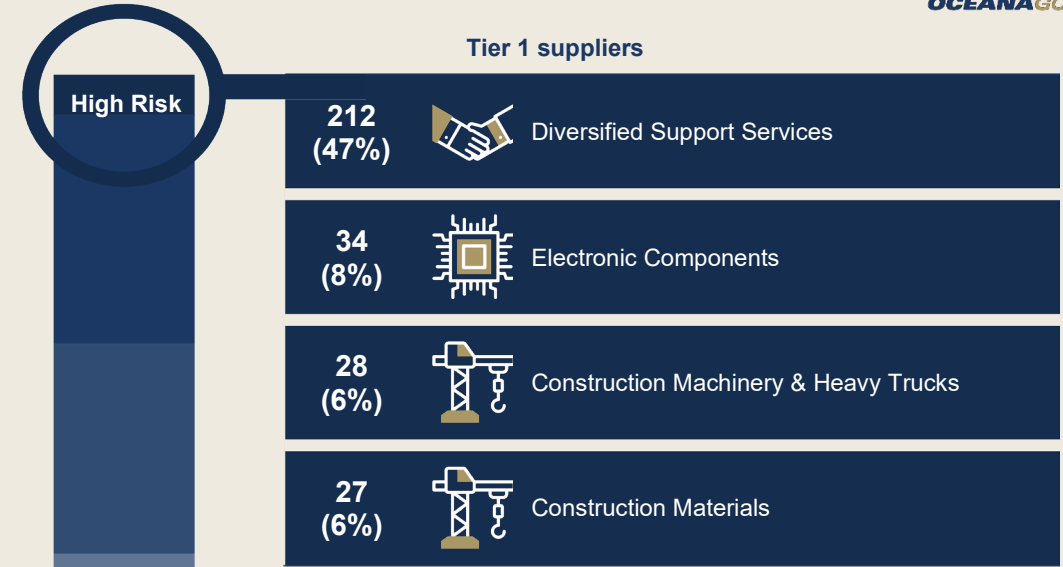


Use of sub-
contracted
labour

The inherent risk assessment identified that the supplier industries (after consideration of the country risk they are operating in) which have the highest inherent modern slavery risks include:

1. Apparel, accessories and luxury goods (9 suppliers)
2. Auto parts and equipment (18 suppliers)
3. Construction materials (27 suppliers)
4. Electrical components and equipment (5 suppliers)
5. Electronic components (34 suppliers)
6. Electronic equipment and instruments (10 suppliers)
7. Industrial machinery (1 supplier)
8. Metal Ore Mining (5 suppliers)
9. Textiles (4 suppliers)
10. Forest products (3 suppliers)
11. Footwear (1 supplier)
12. Health care suppliers (2 suppliers)
13. Diversified support services (212 suppliers).

The industries identified with the largest number of inherently high-risk modern slavery Tier 1 suppliers are illustrated in the following diagram.



Diversified Support Services accounts for 47% of OceanaGold's high-risk supplier portfolio. This Diversified Support Services classification reflects suppliers that provide a varied range of labour-oriented services that generally relate to the operational integration of goods sourced from other supplier industries. For example, electricians for fitting electrical components, maintenance labour for heavy mining equipment and construction labour. The category also includes cleaning, camp security and building maintenance, among other services. Labour-oriented support services generally carry a higher inherent risk for forced labour due to limited bargaining power caused by low skill required to complete the job and the prevalence of migrant labour.

The other major high risk industries reflect complex supply chains and their direct and indirect exposure to modern slavery risks related to low-skilled labour.

In 2023, we will commence a targeted review of Tier 1 suppliers assessed as inherently high-risk for modern slavery across countries and industries to better understand our residual risks. We recognise that international organisations like the International Labour Organization and Global Slavery Index have flagged the Philippines as having high risk of forced and child labour.

Based on this, the Philippines is a priority for understanding our overall residual risk (i.e. the risk after controls have been implemented) within our supply chain.

Actions to assess and address modern slavery risks

Corporate governance

Our holistic approach to responsible mining is guided by our Purpose, Vision and Values; our Code of Conduct; and our Policies and Standards; with oversight by Executive Leadership Team and the Board Sustainability Committee. The responsible mining framework below defines how we operate across our business, to manage potential economic, health and safety, employment, environmental and social impacts and risks, while leveraging the potential to enhance positive outcomes for all our stakeholders, including third parties.

Purpose, Vision, Values			What we want to achieve and how we will conduct our business
Code of Conduct			Behaviours that demonstrate our values
Integrated Management System	Corporate Governance Policies Privacy Continuous Disclosure Securities Trading Speak Up Risk Management Anti-bribery and Anti-corruption Investor Relations Majority Voting	Responsible Mining Policies Health and Safety Environment Communities Fair Employment Human Rights Government and Civil Society Respect at Work	Commitments to align business performance
	Statements of Position		Declaration of our position on material issues
	Performance Standards		Requirements to achieve policy outcomes
	Guidelines, tools and operational processes		Processes and materials to deliver responsible mining practices

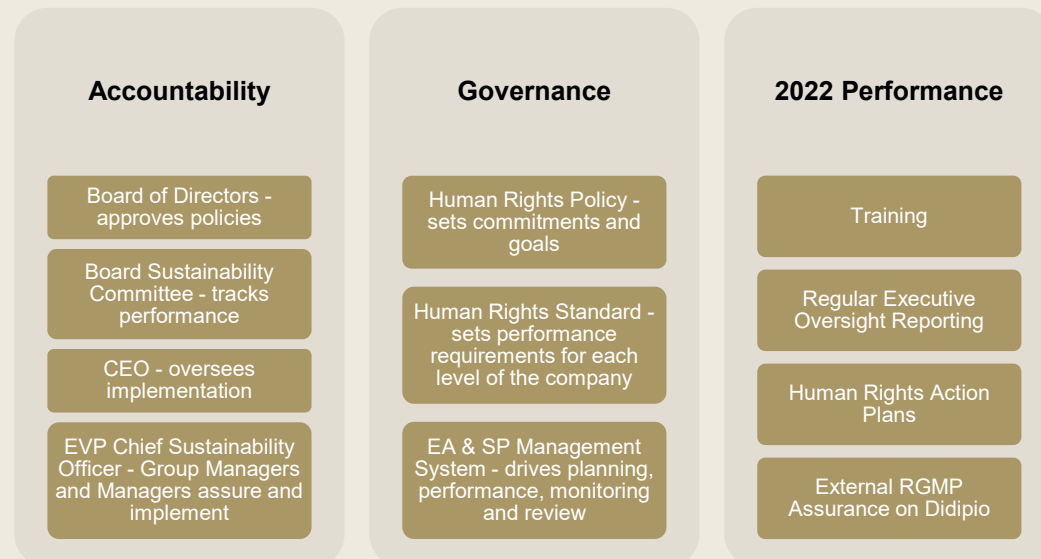
Our Code of Conduct sets expectations for all OceanaGold representatives including directors, officers and employees to conduct all activities to high ethical standards, and states the Company requires the same high standards from contractors, suppliers and business partners. A revised Code of Conduct was endorsed by the Board in December 2022 and the new code was launched in Q1 2023 supported by an ongoing program of communication and engagement.

Our External Affairs and Social Performance (EA & SP) management system governs how we understand and manage our impacts on local communities and society at large (more information on our EA & SP management system is available on our [website](#) and in our [Sustainability Report](#)).

As part of our EA & SP management system, our Human Rights Policy and Standard commit us to respecting the human rights of everyone impacted by our business and throughout our value chain, in line with the UN Guiding Principles on Human Rights, UN Declaration of Human Rights and other international frameworks. This includes requirements for:

- Identifying and mitigating human rights risks, including through HRIAs
- Establishing a grievance mechanism including remedy for adverse impacts
- Training
- Consulting and communicating our human rights impacts.

Our approach to human rights helps us enhance our understanding of modern slavery risk across our value chain. The following infographic sets out our human rights governance structure:



Other key policy or performance standards that support our overall approach to managing modern slavery include:

- Our Group Procurement Standard provides minimum requirements in relation to procurement processes. These requirements include a supplier confirming their strong commitment to health and safety and compliance with applicable laws.
- Our Fair Employment Policy sets out our commitment to provide fair employment and workplace conditions, including compliance with all applicable workplace and employment laws as a minimum. It also strictly prohibits the use of forced, compulsory or child labour.
- Our Government and Civil Society Policy recognises the importance civil society organisations play in supporting and advocating for responsible business and improvements in the wellbeing of people and the environment . It sets out our support for the existence of an open civic space and commitment to work with civil society organisations in a variety of ways. It also sets out our commitment to partnerships across sectors to address complex challenges – of which modern slavery is an example.

Our policy requirements also help to drive performance towards external criteria, including the World Gold Council, Responsible Gold Mining Principles (RGMPs) and the World Gold Council's Conflict Free Gold Standard. In 2018, we joined the United Nations Global Compact, and continue to subscribe to the Global Compact Network Australia's Modern Slavery Community of Practice, which provides a forum for sharing experiences with and learning from peers and experts. In 2022 we also attended various events related to Australia's Modern Slavery Act review and emerging trends in modern slavery-related legislation.

Operational risk assessment

OceanaGold recognises risk management is an integral part of operating our business and an effective risk management framework can protect business value, reduce the potential impacts of hazards to the business, secure a safer work environment and growth opportunities and promote a risk-aware culture.

Risk management is considered by all of our business units in their day-to-day activity. Each operation owns and manages the operational risks applicable to them. Risk management is the responsibility of all employees, contractors and consultants, who are each expected to understand and manage the risks within their area of accountability. More information is available in our Risk Management Policy.

We use Human Rights Impact Assessments (HRIA) as the due diligence tool to identify how our activities could potentially cause harm or contribute to a breach of human rights, including modern slavery. The process begins by assessing our performance against the full set of internationally recognised human rights benchmarks, to determine the most salient human rights risks for our employees, contractors, supply chain workers, communities and other key stakeholders. Guided by the UN Guiding Principles on Business and Human Rights, the severity and likelihood of a potential adverse impact is assessed, considering the scale, scope and if an adverse impact can be remediated if it were to occur.

We conduct HRIAs with the advice and expertise from independent consultants and continue to understand our risks by updating our HRIAs periodically. The HRIA approach utilises a desktop review of documentation, interviews and focus groups with rightsholders and stakeholders which may include OceanaGold and vendors, employees, management, contractors, community groups, government agencies and civil society. Once a HRIA is complete, the respective teams review and prioritise identified actions.



Responsible supply chain management

Our approach to understanding our modern slavery risks is part of a broader, long-term program of work on our Responsible Supply Chain Management (RSCM) framework to help us better understand and manage our third-party risks, including modern slavery. In this work, we are focusing on enhancing our overall compliance program and the people, systems and processes required to support it. In 2022 we focused on building further foundations for the long-term success of the program, in particular enhancing internal tools and guidance, undertaking a rigorous selection process to identify an appropriate third-party technology solution to implement in 2023, and recruiting a new role to lead the program. The aim of these enhancements is to improve automation and bring a greater level of consistency to our processes.

Our RSCM approach is governed by the Responsible Supply Chain Working Group (an Executive-led committee) and supported by the Company's Business Integrity function and Sustainability function as well as other representatives from Commercial, Group Procurement, Legal and Digital Technology as required. In developing our program and our overall approach we are also working with external industry and subject matter experts and we have considered the Responsible Gold Mining Principles (RGMPs), in particular Principle 3 focused on ethical and responsible supply chain management. For more information on our RGMP performance, see our Sustainability Report on our [website](#).

During 2022, we continued to progress several initiatives to improve our responsible supply chain program. The key activities undertaken included improving our supplier responsible sourcing inherent risk assessment processes and tools (which included modern slavery elements) and clarifying our expectations of our suppliers in rolling out new responsible supply chain contract clauses, as part of a program of broader contract template enhancements.

Inherent risk assessment process

An enhanced inherent risk assessment for new supplier contracts was developed during 2022 and launched to all sites during November and December 2022, with ongoing implementation in early 2023. The risk assessment covers business integrity risks including anti-bribery and corruption, conflicts of interest, modern slavery and sanctions compliance. Depending on the assessment responses, further due diligence actions may be taken (e.g. adverse media searches) and controls may be applied (e.g. enhanced contract clauses).

Contract clauses

In October 2022, we deployed new and enhanced responsible supply chain contract clauses as a part of a group-wide update of our standard group templates for contracts and purchase order terms. All new standard contracts and purchase order terms contain an enhanced set of clauses relating to various responsible sourcing risks including anti-bribery and corruption, conflicts of interest, modern slavery, sanctions, subcontracting and record-keeping.

Supplier Code of Conduct

In 2022, we commenced the development of a Supplier Code to provide additional guidance to Tier 1 suppliers on our expectations. This will be delivered in 2023.

Third party management system

During the year we also assessed our business and IT needs and commenced a review of potential third-party technology solutions to support risk assessment and due diligence of Tier 1 suppliers, with the intention that in the future this solution will enhance the in-house risk assessment process developed above. This review was finalised in February 2023 and we will commence configuration and implementation of a solution during 2023.

Sponsorship & Donations

Our sponsorship and donations program supports organisations and initiatives to benefit our local communities and our commitment to be a good neighbour. We recognise it could, however, be a source of potential modern slavery risk. The EA & SP Manual, which aligns to the Responsible Gold Mining Principles and Conflict Free Gold Standard, includes human rights evaluation requirements. Each site has sponsorship and donations processes developed in alignment with the EA & SP Manual. Submissions are subject to a risk assessment and leadership approval. Periodic reporting on sponsorships and donations is also provided to the Audit & Financial Risk Committee.

Human Rights training

Training and awareness help us to integrate our Human Rights program across our business. Our employees are key to identifying and addressing the risks of modern slavery and our training programs are designed to equip our teams with the knowledge, tools and skills to understand what human rights and modern slavery are and what to do if identified.

Since 2019, we focused on operationalising the Human Rights Policy and Standard. In 2019 and 2020, our Board, senior management and employees in key roles across the business completed our Foundational Training on Business and Human Rights, delivered by expert external advisors. It included an introduction to human rights, modern slavery and OceanaGold's human rights risks. This training provides a base level knowledge for our people to build upon as OceanaGold becomes more mature in its approach to managing and understanding human rights. This training is delivered on a periodic basis for any new senior management and other employees in relevant functions.

In 2020, we developed an online training module to assist employees in understanding human rights including modern slavery. In 2021, we rolled out this training to employees who could potentially affect the human rights of internal and external stakeholders (a risk-based approach), including employees in the People and Culture, Commercial, Legal, Health and Safety and Social Performance functions.

In August 2022, an updated Company-wide online induction training module was launched to provide additional detail on the Company's human rights commitments, what rights are most likely at risk, and our expectations of all employees in relation to identifying and responding to potential breaches. By the end of the year, 95% of all eligible employees had completed this mandatory training. This module is in addition to a more targeted business and human rights training package aimed at employees in roles with the greatest human rights impact, including our security personnel.



Grievance mechanisms and remedies

We recognise the importance of creating and running operational grievance mechanisms to:

- Help remediate harm for which OceanaGold identifies it has caused or contributed to
- Act as an early warning system to prevent escalation and potential outbreak of conflicts
- Provide critical information for broader human rights due diligence processes.

Pursuant to our Human Rights Policy and Standard, we are committed to providing grievance mechanisms and will endeavour to provide for, or cooperate in, remediation where we identify we have caused or contributed to adverse human rights impacts including modern slavery.

We provide a number of mechanisms for employees, contractors and third parties to raise grievances, which include human rights issues. Our whistleblower hotline service provides an independent and confidential channel for all employees, contractors and external stakeholders (including suppliers and their employees and contractors) to raise concerns including illegal and unethical conduct and serious breaches of our Code of Conduct and other policies, which could include instances of modern slavery. A number of other internal channels are also available to raise concerns, including Whistleblower Protection Officers. Additional information is available in our Speak Up Policy and on our [Corporate Governance webpage](#).

We also have Complaints and Grievance Mechanisms at each operation to record, monitor and respond to community enquiries, complaints and grievances and take corrective action as required. They were developed in accordance with the criteria of effectiveness for non-judicial grievance mechanisms in the UN Guiding Principles.

During the year, we strengthened executive oversight of current and emerging community risks with the addition of new social performance measures provided to the Executive Leadership team on a regular basis.

We also report annually on the number of notifications through our whistle-blower mechanism and our operational grievance mechanisms in our Sustainability Report, available on our [website](#). In 2022, there were no modern slavery issues raised through these channels.

Assessing effectiveness

To assess the effectiveness of our actions, the below table describes last year's objectives and how they were met.

2022 AND BEYOND OBJECTIVES	OUTCOME	COMMENTS FOR 2022
Human Rights Training – Review and incorporate participant feedback into Human Rights Training package		All feedback received has been reviewed and considered to be incorporated into the Human Rights Training package. A key update for the training package was articulating options for Speaking Up.
Complaints & Grievance Process Training – Continue training with operations on process and incorporate learning from external training		All site representatives were provided with training on what channels were available to raise complaints and grievances.
Complaints & Grievance Process Reporting – Continue to report on our performance for improved accountabilities		EA & SP metrics were regularly reported to the Executive Leadership Team.
Contract Clauses – Rolling out our new and enhanced contract clauses across our operations, including training and guidance		Responsible supply chain contract clauses and supporting guidance were incorporated into the Group-wide refresh of contracts and purchase order terms. A contract clause control was then embedded into the inherent risk assessment process for new contracts for Tier 1 suppliers.
Continuous improvement of Responsible Supply Chain Management framework – Continue to test and build RSCM framework		Undertook a detailed market review and assessment process to identify a technology solution to implement in 2023 to allow us to identify ethical risks (including sanctions, bribery, corruption and modern slavery) across our supply chain and support us to manage them.
Continuous improvement of modern slavery reporting – Continue to seek targeted feedback as we implement our responsible supply chain approach		Targeted feedback was received from external advisors. We also attended various events related to Australia's Modern Slavery Act three year review and emerging trends in global modern slavery-related legislation to help us better understand potential opportunities for improvement.

KEY:  Achieved  Partially achieved  Deferred/Ongoing  Not achieved

Looking ahead

We are committed to continuously improving our approach and learning year on year about what works effectively. In 2023, we will continue to progress our program of work including:

1

Commence a targeted review on Tier 1 suppliers with a high inherent risk

2

Developing and implementing a third-party technology solution across site supplier onboarding processes to support risk assessment and on-going due diligence of Tier 1 suppliers

3

Delivering a Supplier Code of Conduct to support us in communicating our expectations with Tier 1 suppliers

4

Continuous improvement of whistleblower mechanisms

5

Review and continuously improve Group-wide strategic approach to addressing modern slavery risk.

