



**OCEANA**GOLD

# 2023 Modern Slavery Statement

OceanaGold acknowledges the Indigenous Peoples in all jurisdictions that host our operations and offices. We aim to demonstrate our respect for Indigenous Peoples through our actions and commitments to responsible business practices.

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# About this Statement

Modern slavery is any form of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, deception and/or abuse of power. It comes in many forms such as forced labour, debt bondage, forced marriage, slavery and human trafficking. The International Labour Organization, WalkFree and International Organization for Migration estimated approximately 50 million people were subject to modern slavery on any given day in 2021, an increase of 10 million people since 2016<sup>1</sup>.

## Reporting Entities

This is a statement (**Statement**) prepared by OceanaGold Corporation (ARBN 50 124 980 187) (**OceanaGold Corporation**) in accordance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9 (**Canadian Act**) and Australia's Modern Slavery Act 2018 (Cth) (**Australian Act**). Pursuant to the Australian Act, it is a joint statement covering OceanaGold Corporation and Oceana Gold Pty Ltd (ABN 56 107 488 200) (OGPL and, together with OceanaGold Corporation, the Reporting Entities).

This Statement is prepared for the financial year ended December 31, 2023. In this Statement, unless otherwise stated, all references to "OceanaGold", "Group", "we", "us" and "our" refer to OceanaGold and its subsidiaries. Monetary amounts in this Statement are expressed in US dollars (USD), unless otherwise stated.

This Statement constitutes the first statement prepared by OceanaGold Corporation under the Canadian Act. Each of the prior modern slavery statements prepared by the Reporting Entities were prepared in accordance with the requirements of the Australian Act only for the financial years ended December 31, 2020, 2021 and 2022.

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

## Approval and attestation

This Statement was approved by the Board of OceanaGold Corporation on 13 May 2024.

In my capacity as Director of OceanaGold Corporation, and not in my personal capacity, I make this attestation in accordance with the requirements of the Canadian Act.

In accordance with the requirements of the Canadian Act, and in particular section 11 (4)(a) thereof, I attest that I have reviewed the information contained in this Statement for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting period listed above.

I have authority to bind OceanaGold Corporation.



**Gerard Bond**  
Director and President & Chief Executive Officer



Gold pour at Haile Gold Mine, USA.

<sup>1</sup> Global Slavery Index: Executive Summary, pg. 2

# Mandatory Criteria

Section	Canadian Legislation	Australian Legislation
<a href="#">A Message from Our Chief Executive Officer</a>		<b>Mandatory Criteria 7:</b> Any other information that the reporting entity considers relevant.
<a href="#">About this Statement</a>		<b>Mandatory Criteria 1:</b> Identify the reporting entity. <b>Mandatory Criteria 6:</b> Describe the process of consultation with any entities that the reporting entity owns or controls.
<a href="#">Our Structure and Operations</a> <a href="#">Our Supply Chain</a>	<b>11 (3a)</b> The report must also include the following information in respect of each entity subject to the report its structure, activities and supply chains.	<b>Mandatory Criteria 2:</b> Describe the structure, operations and supply chain of the reporting entity.
<a href="#">Our Modern Slavery Risks</a>	<b>11 (3c)</b> The report must also include the following information in respect of each entity subject to the report the parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.	<b>Mandatory Criteria 3:</b> 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.
<a href="#">Actions Taken to Assess and Address Modern Slavery Risks</a>	<b>11 (1)</b> The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity. <b>11 (3b)</b> The report must also include the following information in respect of each entity subject to the report its policies and its due diligence processes in relation to forced labour and child labour. <b>11 (3d)</b> The report must also include the following information in respect of each entity subject to the report any measures taken to remediate any forced labour or child labour. <b>11 (3e)</b> The report must also include the following information in respect of each entity subject to the report any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains. <b>11 (3f)</b> The report must also include the following information in respect of each entity subject to the report the training provided to employees on forced labour and child labour.	<b>Mandatory Criteria 4:</b> 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.
<a href="#">Assessing Effectiveness</a>	<b>11 (3g)</b> The report must also include the following information in respect of each entity subject to the report how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.	<b>Mandatory Criteria 5:</b> Describe how the reporting entity assesses the effectiveness of such actions.

# A Message from our Chief Executive Officer

Everyone deserves to be treated with dignity and respect. This ethos is embedded in Our Values, which put the safety and wellbeing of our people, our communities, our suppliers and the environment, at the forefront of the decisions we make. Our Human Rights Policy details our commitment to respecting the human rights of everyone impacted by our activities, from exploration through to mining and closure. This includes our employees, individuals in the communities we operate, contractors in our supply chain and other rightsholders. Our Policy is consistent with the United Nations Universal Declaration of Human Rights and Voluntary Principles on Security and Human Rights.

This Modern Slavery Statement, prepared in accordance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act and Australian Modern Slavery Act, outlines our work in 2023 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 remain committed to further integrating our modern slavery risk management approach into our business during 2024 through the following:

- Further development of our supplier due diligence process to cater for small and local suppliers;
- Enhancing processes to refresh our suppliers' risk attributes at contract renewal;
- A review of our Sponsorship and Donations standard to identify and manage potential modern slavery risk; and
- Finalizing a review of our suppliers identified with a high inherent risk.

At OceanaGold, we recognize modern slavery must be tackled by collective action and so we will continue to work with our business partners and suppliers to understand and tackle this social problem. We remain committed to transparent reporting on our progress and the challenges we face in this area and welcome your feedback.



**Gerard Bond**  
*President and Chief Executive Officer*



**Gerard Bond**  
*President and Chief Executive Officer*

# Our Structure and Operations

## Our structure

OceanaGold Corporation is the parent company of the Group. OceanaGold Corporation is incorporated under the Business Corporations Act (British Columbia) and listed on the Toronto Stock Exchange (TSX: OGC). The Company's ownership structure consists of three primary wholly-owned entities which directly hold its assets:

- Romarco Minerals Inc. – incorporated in Canada and holds the Company's interests in the United States.
- Oceana Gold Pty Ltd (OGPL) – incorporated in Australia and holds the Company's interests and operations in New Zealand; and
- OceanaGold (Singapore) Pte. Ltd. – incorporated in Singapore and holds the Company's interests and operations in the Philippines.

There are a number of other entities in the OceanaGold Group including management companies, holding companies and subsidiaries. Our latest [Annual Information Form](#) 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 doré bars that are transported to refineries and sold. The Didipio Mine also produces a copper-gold concentrate.

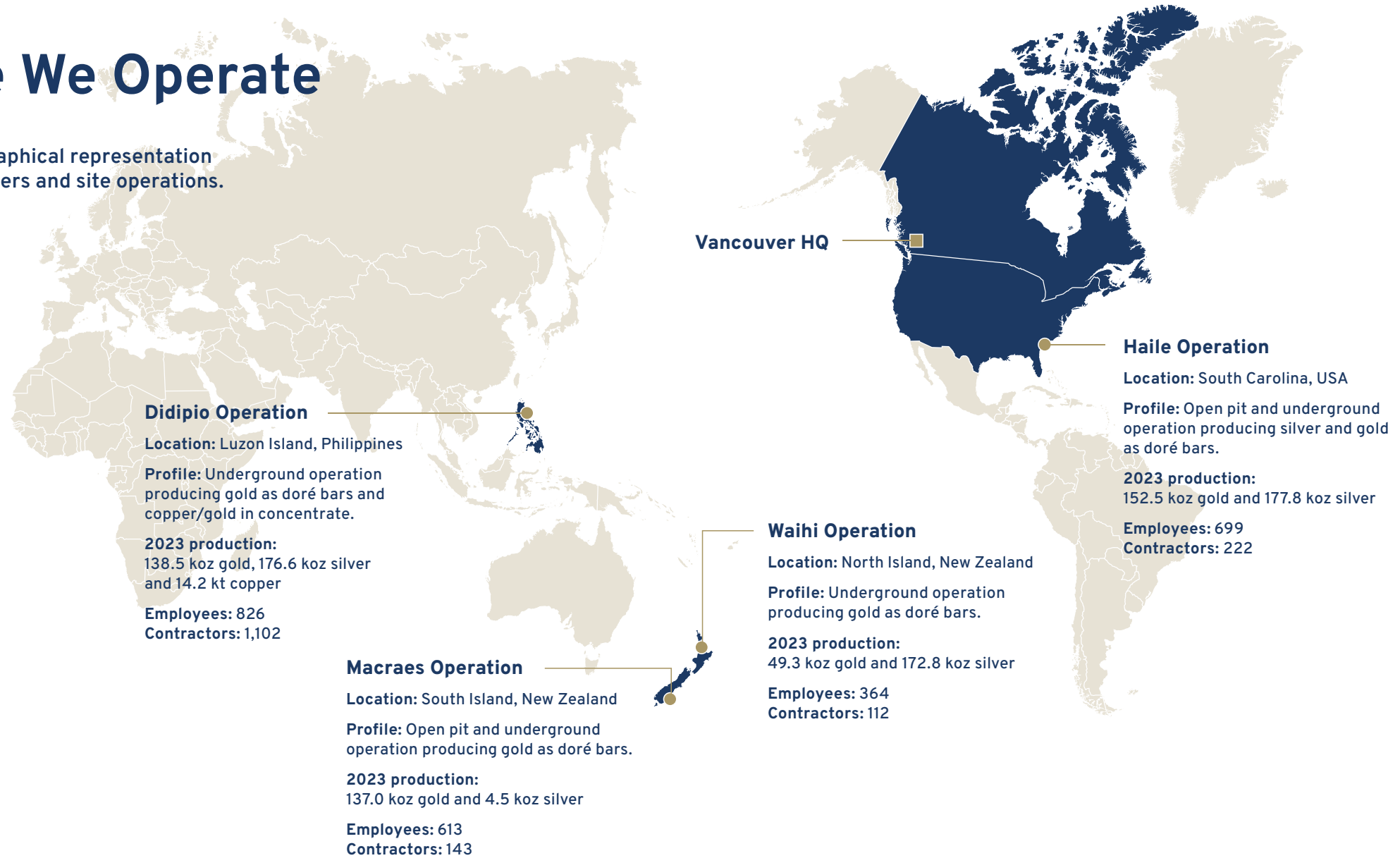
Our site operations are supported by dedicated Geology, Health & Safety, Environment, People & Culture, Legal, External Affairs and Social Performance, Information Technology, Mining, Processing, Asset Management and Commercial teams. Our head office is based in Vancouver and supported by offices in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



Didipio Mine, the Philippines.

# Where We Operate

Below is a geographical representation of our headquarters and site operations.



### Our other investments and projects

OceanaGold's operations 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 projects in 2023 included:

- Waihi North Project which includes the potential development of the Wharekirauponga underground mine in New Zealand;
- A Project Deed (100% owned) with Tasman Mining Limited for the development of the Blackwater deposit in the South Island of New Zealand<sup>1</sup>; and
- Reefton Restoration Project, a legacy closure project located in New Zealand.

Our portfolio of investments in 2023 included:

- Minority interests in NuLegacy Gold Corporation (7.82%) and TDG Gold Corp (1.72%) publicly listed gold exploration companies conducting exploration activities in Nevada and Canada respectively; and
- 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 latest [Annual Information Form](#).

<sup>1</sup> On 31 January 2024, we announced the execution of a sale and purchase agreement (the "Blackwater SPA") with Tasman Mining Limited, a wholly-owned subsidiary of Federation Mining Inc., for them to acquire our interest in the Blackwater project in New Zealand. The Blackwater SPA is subject to certain closing conditions, including regulatory approval, and is expected to close in 2024.



Our Reefton Restoration Project in New Zealand.

# Our Supply Chain

## Our supply chain roadmap

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

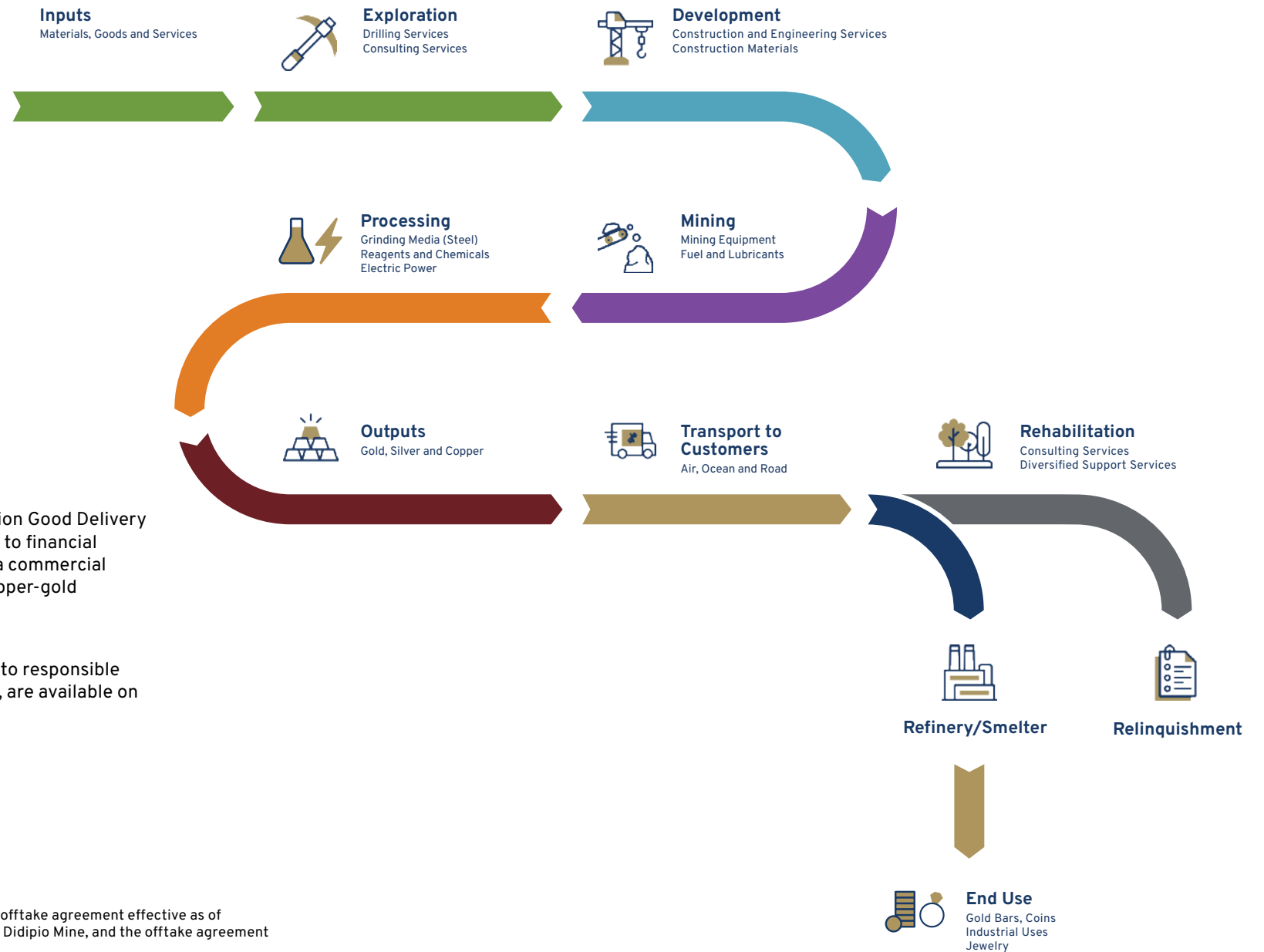
## Refineries

In 2023, 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. During the reporting period, we had a commercial offtake agreement with Trafigura Group Pte. Ltd. (Trafigura) for the copper-gold concentrate produced in the Philippines.<sup>1</sup>

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 Supply Chain



<sup>1</sup> A termination noticed dated March 8, 2023 was delivered to Trafigura to terminate the offtake agreement effective as of April 1, 2024. A competitive tender process for the sale of copper concentrate from the Didipio Mine, and the offtake agreement was awarded to Transamine Trading S. A, which took effect on April 1, 2024.

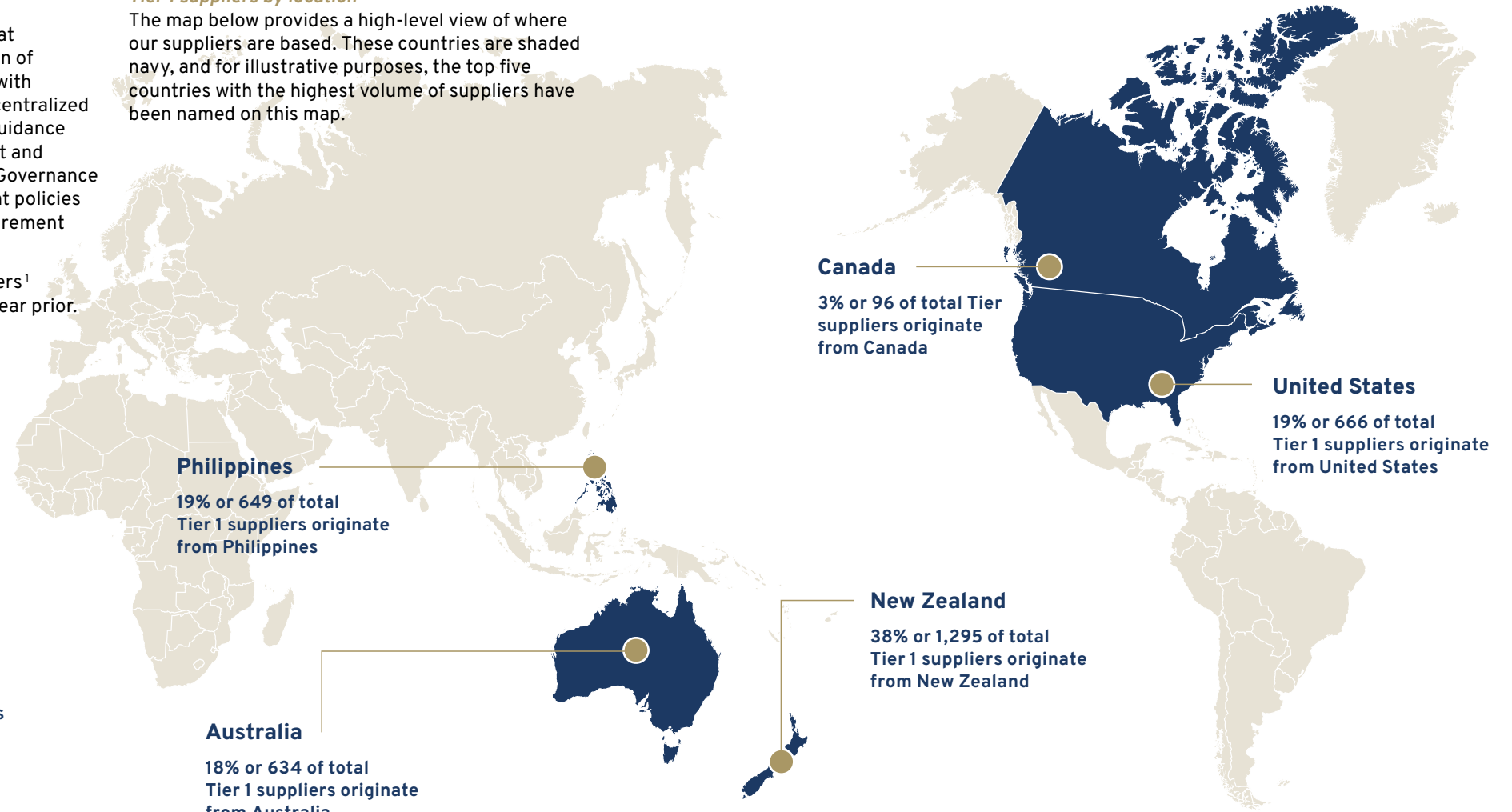
### Our suppliers

The procurement of goods and services at OceanaGold is executed by a combination of operationally based commercial teams, with support from legal professionals, and a centralized 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 2023, we engaged 3,439 Tier 1 suppliers<sup>1</sup> representing a 0.8% increase from the year prior.

### Tier 1 suppliers by location

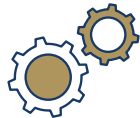
The map below provides a high-level view of where our suppliers are based. These countries are shaded navy, and for illustrative purposes, the top five countries with the highest volume of suppliers have been named on this map.



**3,439**  
Tier 1 suppliers



**51%**  
majority spend across  
four industries



Tier 1 suppliers from  
**50** different industries

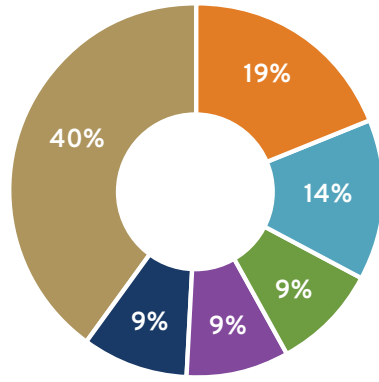


**30**  
different countries  
of suppliers

<sup>1</sup> Tier 1 suppliers relate to our direct suppliers we do business with. Tier 2 suppliers relate to the suppliers our Tier 1 suppliers source from.

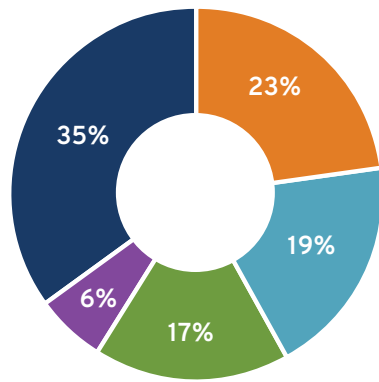
**Tier 1 suppliers by industry**

Our new risk methodology relies on the Global Industry Classification Standard (GICS) to improve the consistency and comparability of risk analysis across suppliers. The composition of our statistics may vary compared to prior years as we previously used GICS Sub-Industry classification.



**Largest industries by supplier spend**

- Machinery
- Professional Services
- Commercial Services and Supplies
- Chemicals
- Oil, Gas and Consumable Fuels
- Other



**Largest industries by number of suppliers**

- Commercial Services and Supplies
- Professional Services
- Machinery
- Construction and Engineering
- Other



New haul truck enroute to our Macraes Operation, New Zealand.

# Our Modern Slavery Risks

## Risks in our operations

We recognize 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 (HRIAs) we conducted at each of our operations, as described in the [Actions Taken 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 workforce were in exploitative situations. We understand this risk is heightened when our workforce or contractors 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.

In 2023, each of the sites completed an HRIA, guided by the OceanaGold Human Rights Policy (located on our [Corporate Governance](#) webpage) and the [UN Guiding Principles on Business and Human Rights](#). The HRIAs considered the fundamental human rights of our employees and contractors, individuals in the communities we operate, workers in our site’s local supply chain, and other rightsholders. There were no 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 the HRIAs, we have confirmation that we remain in conformance with the requirements of the World Gold Council’s Responsible Gold Mining Principles (RGMP) in 2023. The conformance statement is detailed in the [2023 Responsible Gold Mining Principles \(RGMP\) Implementation and Conformance Report](#) which has been independently assured for accuracy by our assurance provider. Conformance with the World Gold Council’s RGMPs requires that our underlying systems and processes have been implemented and applied at the operations to deliver ethical conduct, understanding of our impacts, and appropriate supply chain and human rights performance.

## 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.

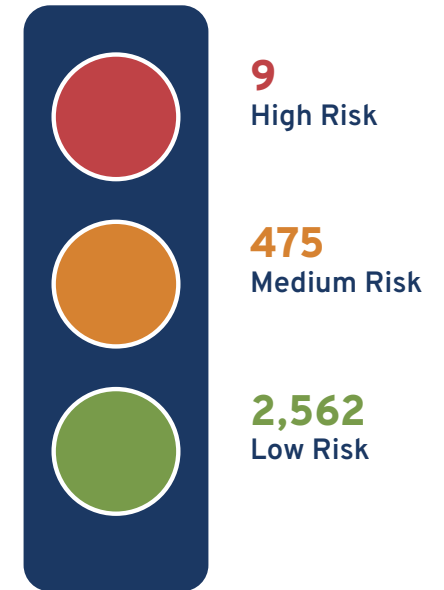
In prior years, Ernst & Young (EY) supported us to assess our supplier portfolio for potential exposure to modern slavery practices using an inherent risk methodology which took into account risk factors such as business criticality, total spend, country of operations and industry. In late 2023, we developed and implemented our own risk methodology and supporting technology for assessing suppliers which takes into account risk factors that assess modern slavery as well as other ethical risks such as bribery and corruption, conflicts of interest and economic sanctions. Refer to the [Due diligence processes](#) section for more detail.

In January 2024, a snapshot of 3,046 active Tier 1 suppliers was extracted and assigned risk attributes based on the information available in our internal systems. This information was then uploaded into our third-party technology system to be calculated against the new risk methodology to produce a risk rating for each supplier.

The following risk ratings<sup>1</sup> indicate overall ethical risk (which includes modern slavery risk) for our Tier 1 suppliers as at January 2024.

The nine suppliers identified as high risk have been reviewed by the relevant site Procurement and Legal teams to assess and understand potential impact to their operations. Of the nine suppliers, eight remain active suppliers and are subject to heightened risk monitoring.

## Overall ethical risk



We anticipate this risk rating mix to fluctuate over the next two to three years as we continuously improve the model and deepen our understanding of suppliers through refreshed risk attributes from due diligence questionnaires issued at contract renewal. For more information, refer to [Due diligence processes](#) section within the [Actions Taken to Assess and Address Modern Slavery Risks](#) and [Assessing Effectiveness](#) sections.

<sup>1</sup> As a general guide – Low risk means no concerns identified. Medium risk means the supplier had indicators or concerns that that may have required further analysis performed. High risk means the supplier had indicators or concerns that require further analysis, monitoring or risk mitigation applied.

**Tier 1 supplier geographic risks**

As part of the assessment the following nine countries were identified, through WalkFree’s Global Slavery Index, as having an estimated prevalence of modern slavery greater than 3.5 per 1,000 population.

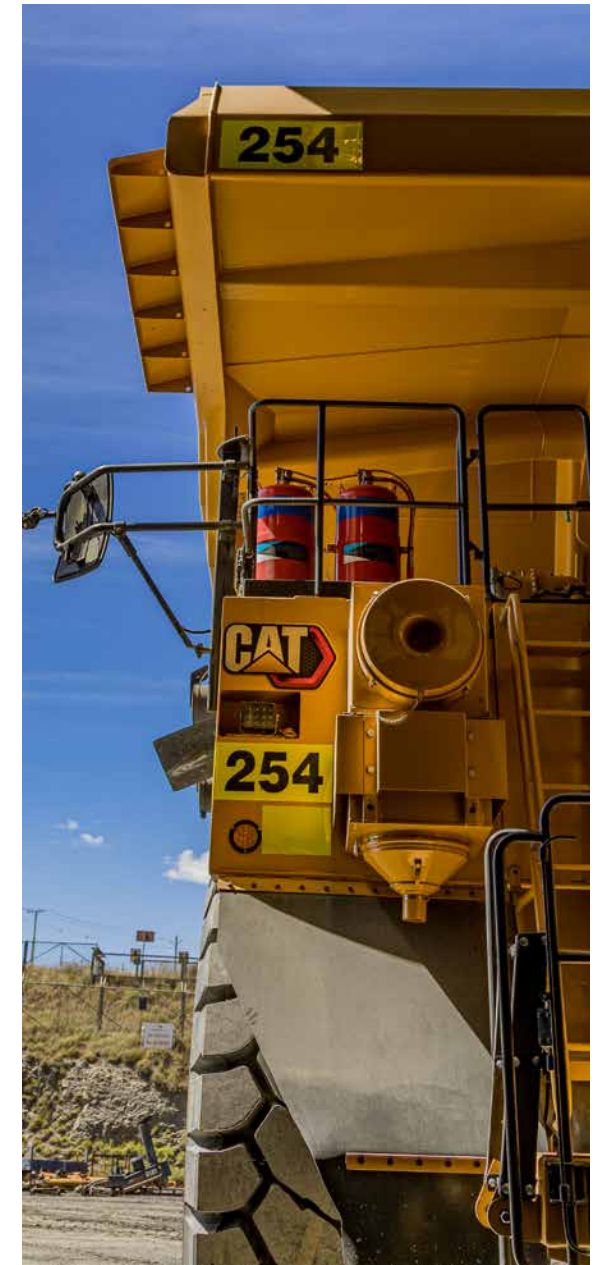
- Philippines (587 suppliers)
- China (11 suppliers)
- Indonesia (4 suppliers)
- United Arab Emirates (1 supplier)
- Peru (1 supplier)
- Malaysia (1 supplier)
- Thailand (1 supplier)
- Vietnam (1 supplier)
- South Korea (1 supplier)

**Tier 1 supplier industry risks**

We recognize that we engage with several industries with a high-modern slavery risk. These include, but are not limited to, the following:

- Commercial Services and Supplies (747 suppliers)
- Construction and Engineering (165 suppliers)
- Electrical Equipment (132 suppliers)
- Construction Materials (60 suppliers)
- Metals and Mining (52 suppliers)
- Electronic Equipment, Instruments and Components (39 suppliers)
- Textiles, Apparel and Luxury Goods (23 suppliers)
- Oil, Gas and Consumable Fuels (19 suppliers)
- Technology Hardware, Storage and Peripherals (19 suppliers)
- Building Products (15 suppliers)
- Health Care Equipment and Supplies (15 suppliers)
- Food Products (7 suppliers)
- Paper and Forest Products (7 suppliers)
- Marine Transportation (3 suppliers)

The industries have been assessed as high risk for modern slavery by using publicly available information from WalkFree, International Organization for Migration and Transparency International. In addition to this, we sought oversight from a human rights consultancy firm to validate our assessment of these industries.



Haul truck at our Macraes Operation, New Zealand.

# Actions Taken to Assess and Address Modern Slavery Risks

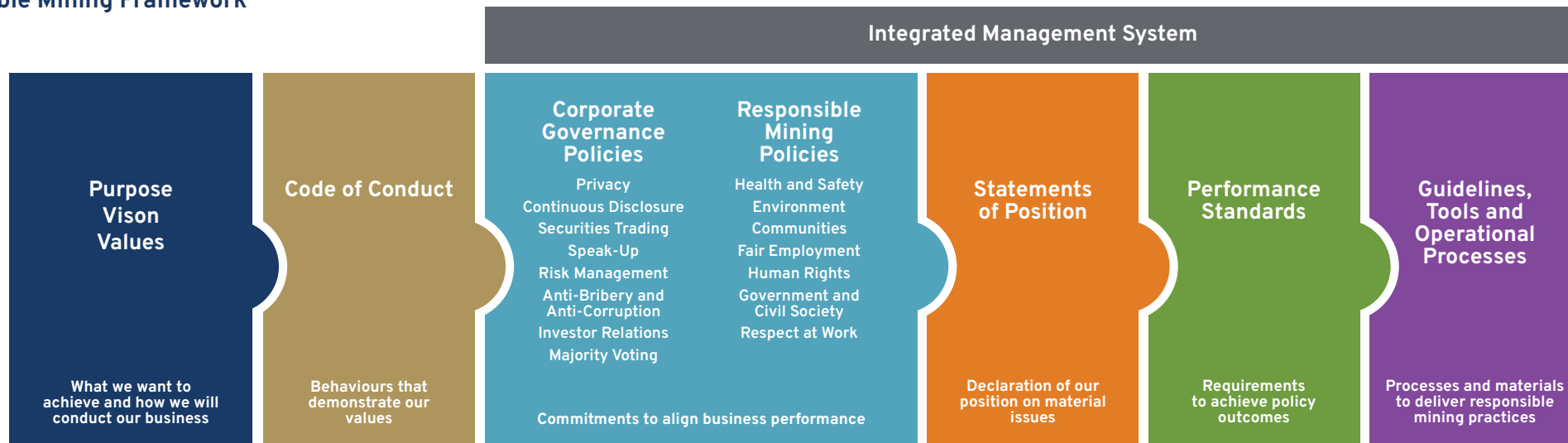
## Corporate governance

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 the Executive Leadership Team and the Sustainability Committee which reports to the Board.

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.

Our policy requirements also help to drive performance towards external criteria, including the World Gold Council's, [Responsible Gold Mining Principles \(RGMPs\)](#) and the World Gold Council's [Conflict Free Gold Standard \(CFGs\)](#).

## Our Responsible Mining Framework



**External Affairs and Social Performance Manual**

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](#)). 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 Business and 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;
- Human Rights Training; and
- 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 infographic (right) sets out our human rights governance structure.

**Human Rights Governance**



**Supplier Code of Conduct**

As part of our ongoing commitment to work safely, ethically and responsibly in 2023 we developed and published our new Supplier Code of Conduct (located on our [Corporate Governance](#) webpage) in English and Tagalog<sup>1</sup>. This Code provides high-level guidance on topics such as Human Rights, Communities and Indigenous Peoples. It reflects our shared commitment to responsible business practices and outlines the standards we expect all of our Tier 1 suppliers to understand and adhere to.

**Other governance**

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

- Our enhanced [Code of Conduct](#) (released in February 2023) is a practical guide for everyone at OceanaGold. It applies to everyone at OceanaGold: directors, employees, contractors and anyone acting on our behalf. It helps us live our values and guides us in our decision making.
- 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 (located on our [Corporate Governance](#) webpage) 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.

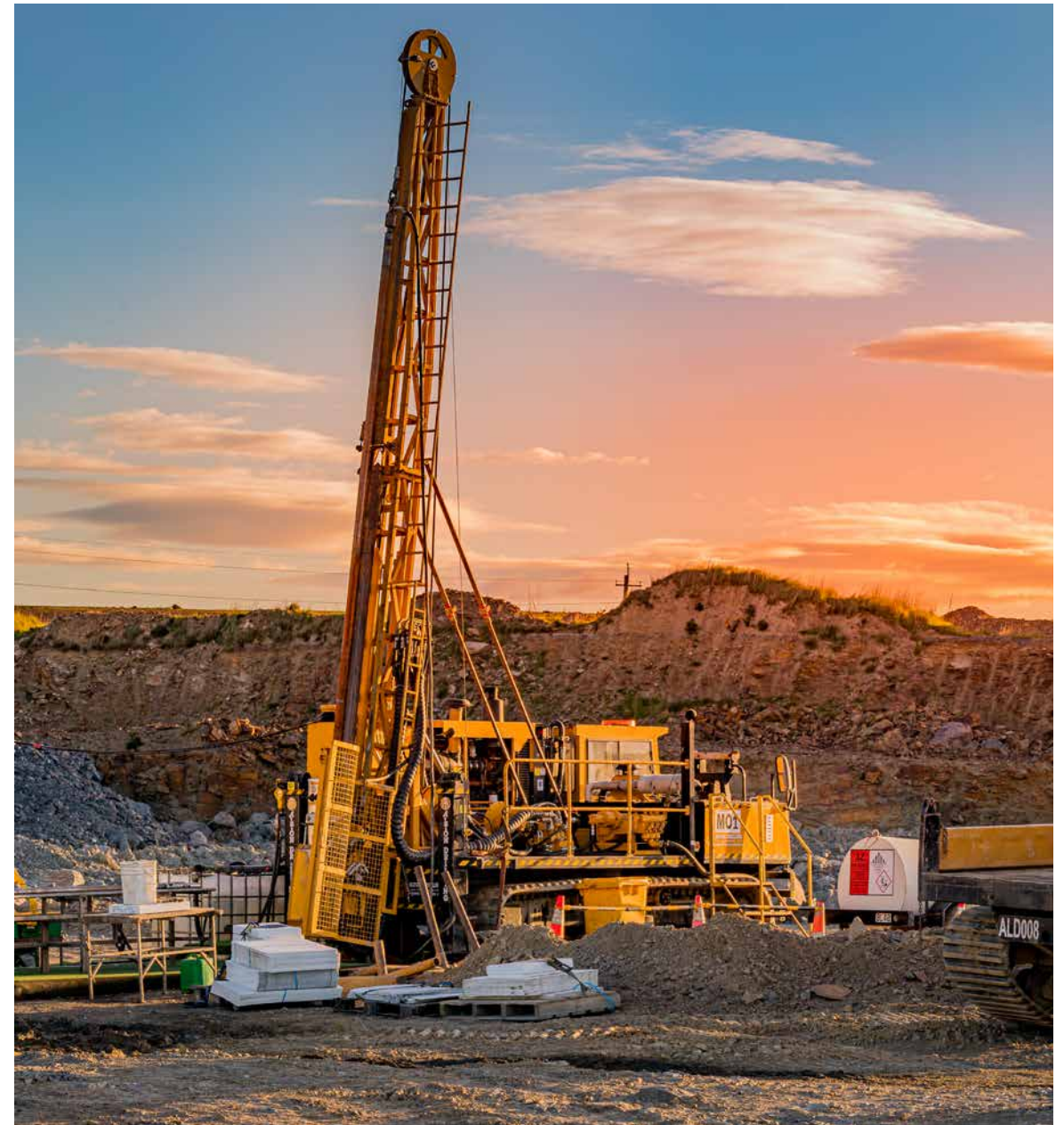
- Our Government and Civil Society Policy (located on our [Corporate Governance](#) webpage) recognizes the importance civil society organizations play in supporting and advocating for responsible business and improvements in the wellbeing of people and the environment. It sets out our support for the existence of an open civic space and commitment to work with civil society organizations.

**Industry engagement**

In 2018, we joined the [United Nations Global Compact](#), and continue to participate in the Global Compact Network Australia’s Modern Slavery Community of Practice. Part of this commitment is to engage in open forums and conferences to share experience and learn from our peers.

In 2023, we sought guidance from the industry to develop and improve our risk methodology for supplier due diligence. This included reviewing data and guides from [WalkFree](#), [International Organization for Migration](#), [US Department of Labour](#) and [Transparency International](#) to inform how we risk rate specific industries and countries. We further engaged with human rights experts to provide input and oversight on these risk attributes.

We also attended the Australian Government’s Modern Slavery Conference to improve our understanding on best practice in relation to modern slavery risk management and reporting and support our links to industry and civil society. Learnings from the conference were shared with members of the Responsible Supply Chain Working Group.



Exploration drill rig at our Macraes Operation, New Zealand.

<sup>1</sup> Tagalog is the national language of the Philippines.

### Human rights training

Training helps to raise awareness and integrate Human Rights across our business. Our employees are key to identifying and managing the risks of modern slavery and our training is designed to equip our employees with the knowledge, tools and skills to understand what human rights and modern slavery are and what to do if identified.

In 2020, we developed an online training module to assist employees to understand human rights including modern slavery. In 2021, we rolled out this training to leaders and external facing employees across People and Culture, Commercial, Legal, Health and Safety and Social Performance functions who are in positions where an understanding and awareness of human rights is important. The training is mandated every two years to refresh awareness on human rights and modern slavery. In August 2022, an updated Company-wide online 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.

#### **Commitment for 2024:**

- Deliver updated human rights awareness training to the OceanaGold Board of Directors

### Operational risk assessment

OceanaGold recognizes 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 and external communities, secure a safer work environment and growth opportunities and promote a risk-aware culture.

Risk management is considered by all 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 on our [website](#).

We use Human Rights Impact Assessments (HRIAs) 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 recognized human rights benchmarks, to determine the most salient human rights risks on site for our employees, contractors, supply chain workers, communities and other key stakeholders.

The HRIAs consider human rights, as outlined in the [UN Declaration of Human Rights \(UDHR\)](#) and informed by the [UN Guiding Principles on Business and Human Rights](#). It includes a saliency mapping of human rights risks and opportunities related to the operations and business relationships, as well as a gap analysis of OceanaGold's current management of these risks against relevant international standards and guidelines.

The HRIAs are conducted by independent consultants. The HRIA methodology includes desktop reviews of documentation, interviews and focus groups with rightsholders and stakeholders which may include OceanaGold vendors, employees, management, contractors, external community groups, government agencies and civil society. Once an HRIA is complete, the respective teams review and prioritize identified recommendations and actions which are tracked on a quarterly basis.



Water Treatment Plant at our Waihi Operation, New Zealand.

## Committees and working groups

Our Responsible Supply Chain Management approach is governed by two groups – the Responsible Supply Chain Working Group (RSCWG) and the Responsible Supply Chain Steering Committee (RSCSC).

The purpose of the RSCSC is to provide guidance and oversight of the Responsible Supply Chain program of work. It further facilitates strategy development, decision making, advocacy, risk management, and improved planning. The RSCSC is comprised of Legal, Sustainability and Technology SLT members and meets on a quarterly basis or as required.

The RSCWG is a committee led by the Company's Business Integrity function and supported by key representatives from Sustainability, Commercial, Group Procurement, Legal, Digital Technology and site operations as required. The RSCWG focuses on identifying and resolving key operational issues to achieve key strategic projects. The RSCWG meets monthly or as required.

## Due diligence processes

### *Inherent risk assessment process*

A due diligence process for new Tier 1 supplier contracts was developed during 2022 and launched across all sites in Q1 2023. This process covers business integrity risks such as 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).

### *Supplier due diligence – Enhanced methodology and technology solution*

As part of our planned continuous improvement in 2023, we completed our review of third-party technology solutions to support risk assessment and due diligence of Tier 1 suppliers, designed an enhanced risk methodology and configured the chosen technology solution to embed our risk methodology and automate workflow tasks. The enhanced methodology and technology solution was implemented across all sites on a pilot basis in 2023 with a full roll-out completed in Q1 2024.

The process starts with issuing the supplier with a due diligence questionnaire that allows us to collect supplier risk factors outlined in the table below.

The information collected against these risk factors are validated before producing an overall risk rating which is either Low, Medium or High. Depending on the risks identified across these risk factors, further risk assessment activities will be undertaken (including an additional questionnaire for suppliers rated as high risk) and potentially appropriate controls designed and implemented.

Due to the differences in how the risks can manifest in Didipio's Social Development Management Program (SDMP) and Community Development Fund (CDF) suppliers, it was determined that further scoping is required to develop a customized risk methodology that is appropriate to assess them and configure this in the technology solution. Accordingly, during the period, these suppliers

were screened using the original inherent risk assessment process as outlined in the above section. A tailored risk process for assessing suppliers supporting Didipio's SDMP and CDF will be developed in 2024.

### *Commitments for 2024:*

- Enhance processes that support a refresh of the supplier's risk attributes at contract renewal.
- Commence scoping a risk methodology and process to support SDMP and CDF suppliers.

Risk factor	Definition	Risk considered
<b>Country of Operations</b>	Where the supplier operates, distributes or manufactures their products or services.	Bribery, corruption and modern slavery risks associated with the country.
<b>Industry</b>	What industry the supplier operates in.	Bribery, corruption and modern slavery risks associated with the industry.
<b>Conflicts of Interest</b>	Whether a key representative of the supplier has disclosed other business interests or personal relationships that could conflict with OceanaGold.	Conflicts of interest risk that could impact the arrangement.
<b>Government Relationships</b>	Whether the supplier or a key representative of the supplier has a relationship or connection with a government.	Bribery and corruption risks associated with political exposure.
<b>Historical Conduct</b>	Whether the supplier is subject to any economic sanctions or adverse media findings.	Sanctions, bribery, corruption, human rights abuses and/or other unethical activity.
<b>Modern Slavery</b>	Where the supplier sources goods or services from a country that is considered high risk for modern slavery OR where the supplier has labour conditions that are considered high risk for modern slavery.	Forced labour and child labour risk associated with goods or services offered.

**Modern Slavery Statement 2022 – Inherent risk assessment**

In the 2022 statement, our supplier base was assessed against Relationship Criticality, Country, Industry and Spend to produce an inherent risk rating. Through this assessment, 451 suppliers were identified as high inherent risk for forced labour. Further work was completed to screen the suppliers against sanctions and adverse media databases to identify any historical conduct. Additionally, a review was also performed to determine if the supplier produced goods or services that were considered high risk for forced labour or child labour. Out of the 451 suppliers, 43 were identified for further assessment.

**Commitment for 2024:**

- Finalize the review of the 43 suppliers by leveraging the new supplier due diligence technology solution and risk methodology.

**Sponsorship and donations**

Our sponsorship and donations program supports organizations and initiatives to benefit our local communities and our commitment to be a responsible miner. The EA & SP Manual contains the Sponsorship and Donations Standard. Each site has sponsorship and donations processes developed in alignment with this standard. Sponsorship and donation requests are subject to a risk assessment and leadership or committee approval. Quarterly reporting on sponsorships and donations is also provided to the Audit & Financial Risk Committee and summarized annually in the Sustainability Report.

**Commitment for 2024:**

- We recognize that Sponsorship & Donations could be a source of potential modern slavery risk. To address this, we will commence a review of the Standard to consider opportunities to integrate controls to manage potential human right risks.

**Grievance mechanisms, remedies and remediation**

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

- Remediate harm for which OceanaGold identifies it has caused or contributed to;
- Act as an early warning system to prevent escalation of community issues; and
- Provide critical information for broader human rights due diligence processes.

Pursuant to our Human Rights Policy and Standard (located on our [Corporate Governance](#) webpage), we are committed to providing an effective grievance mechanism 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. Remediation – where required – is designed and managed on a case-by-case basis. However, formalized remediation processes will be the subject of a future work program.

In 2023, we did not identify any instances of income loss to the most vulnerable families through our formal feedback mechanisms (i.e. grievance mechanisms, whistleblower or HRIAs). We will continue to monitor and assess this, and should we identify any instances we will consider remedies appropriate to the circumstances in accordance with international standards.

**Whistleblower hotline**

We provide several 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.

In 2023, we spent time reviewing and qualifying potential whistleblower hotline providers that could improve our reporter experience and enhance our support processes. Implementation of the selected provider will be completed in 2024.

A number of other internal channels are also available to raise concerns. Additional information is available in our Speak Up Policy (located on our [Corporate Governance](#) webpage). On a quarterly basis, we provide the Audit & Risk Committee with an overview of whistleblower complaints received, their status and closure.

**Commitment for 2024:**

- Implementing a new hotline provider to improve reporter experience and enhance supporting processes.

**Operational grievance mechanisms**

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 alignment with the criteria of effectiveness for non-judicial grievance mechanisms in the UN Guiding Principles.

During the year we continued to provide our executives and Board with an overview of community grievances and concerns through quarterly reporting of grievances received, their status and closure.

We also report annually on the number of notifications through our whistle-blower hotline and our operational grievance mechanisms in our [Sustainability Report](#).



Drill core from our Haile Gold Mine, USA.

# Assessing Effectiveness

We continuously improved our Group-wide strategic approach to addressing modern slavery risk as demonstrated through our 2023 outcomes.

The following table provides an overview of the actions we take to address modern slavery risk and the relevant activities completed to achieve key outcomes. The table further articulates whether the activities relate to a commitment outlined in 2022's Statement.

Actions taken to address risk of modern slavery	2023 Outcomes
<p><b>Corporate governance</b></p> <p>Developing governance policies and standards to set our expectations with Tier 1 suppliers.</p> <p><b>2023 Commitment</b></p> <ul style="list-style-type: none"> <li>Delivering a Supplier Code of Conduct to support us in communicating our expectations with Tier 1 suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>Code of Conduct was published in Q1 2023.</li> <li>Our first Supplier Code of Conduct was published and in December 2023 we communicated it to active Tier 1 suppliers that had a current email address on file.</li> </ul>
<p><b>Industry engagement</b></p> <p>Active collaboration and engagement with industry experts to improve subject matter expertise in modern slavery.</p>	<ul style="list-style-type: none"> <li>Applied industry knowledge and obtained expert oversight to develop a risk methodology that appropriately targets human rights risks.</li> <li>Engaged a strategy and management consultancy firm with expertise in human rights to complete a review of operations and produce the Human Rights Impact Assessments.</li> <li>Attended Australia's National Modern Slavery Conference 2023 to understand emerging trends in modern slavery-related legislation and community expectations.</li> </ul>
<p><b>Human rights training</b></p> <p>Deliver human rights training to employees in roles with the greatest human rights impact, including our security personnel.</p>	<ul style="list-style-type: none"> <li>Delivered human rights training to 414 eligible employees.</li> <li>100% of OceanaGold Executives and 94% of Senior Leaders across the company had completed the training as at 31 December 2023.</li> </ul>
<p><b>Operational risk assessment</b></p> <p>Conduct human rights impact assessments across organization.</p>	<ul style="list-style-type: none"> <li>All site Human Right Impact Assessments were independently reviewed and updated.</li> </ul>

Actions taken to address risk of modern slavery	2023 Outcomes
<p><b>Committees and working groups</b></p> <p>Develop effective committee governance to make decisions on key responsible supply chain issues, including issue management and supporting improvement opportunities.</p>	<ul style="list-style-type: none"> <li>Reviewed and evaluated third party technology providers that specialize in supplier due diligence software, as key stakeholders in selecting a provider.</li> <li>Oversaw the design of the technology solution chosen to support the supplier due diligence process and risk methodology.</li> </ul>
<p><b>Due diligence processes</b></p> <p>Conduct due diligence of suppliers to understand potential modern slavery risks associated with doing business.</p> <p><b>2023 Commitments</b></p> <ul style="list-style-type: none"> <li>Delivering 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.</li> <li>Commence a targeted review on Tier 1 suppliers with a high inherent risk.</li> </ul>	<ul style="list-style-type: none"> <li>Successful development of a risk methodology which targets risks relevant to our industry and business operations.</li> <li>Successfully implemented the third-party technology solution which includes a business process that meets our compliance objectives and improves operational efficiency and supplier experience.</li> <li>Bulk screening of 3,046 using the new risk methodology and technology.</li> <li>Completed preliminary review of 451 Tier 1 suppliers identified as high-risk for modern slavery risk in 2022.</li> </ul>
<p><b>Grievance mechanisms and remedies</b></p> <p>Develop effective mechanisms to record, monitor and respond to grievances and provide remedy in a timely manner.</p> <p><b>2023 Commitment</b></p> <ul style="list-style-type: none"> <li>Continuous improvement of our whistleblower mechanisms.</li> </ul>	<ul style="list-style-type: none"> <li>No modern slavery issues raised through either the operational grievance mechanism channel or whistleblower service.</li> <li>Reviewed and qualified potential whistleblower hotline providers that could improve our reporter experience and enhance our support processes.</li> </ul>



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