
2021

Modern Slavery Statement



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Modern Slavery Statement

I am pleased to present our Modern Slavery Statement covering the 2021 calendar year.

Gold Road strives to protect the people and communities associated with our activities and operations (including, but not limited to, our supply chain). As with all our non-financial reporting disclosures, Gold Road seeks to take a 'beyond compliance' approach to its reporting. Specifically regarding Modern Slavery, where we are committed to protecting vulnerable people and groups.

Gold Road engaged the not-for-profit organisation Anti-Slavery Australia, an industry leader in the anti-slavery movement based at the University of Technology Sydney to provide an independent review of current (and future) Modern Slavery risks centric to the Australian gold industry.

Anti-Slavery Australia's report noted that in specific regions of the world gold is produced by people working in Modern Slavery. According to the Global Slavery Index gold is the 6th most likely product to be produced by people working in Modern Slavery. Examples of Modern Slavery labour practices in these regions may be from forced labour practices facilitated or perpetrated by military and local authorities exploiting people and subjecting individuals to excessively heavy labour and/or long days; prisoners are forced to mine for gold; workers in gold mines are routinely subject to induced indebtedness (where they must borrow resources under coercive or manipulative terms) and held against their will using the threat of physical violence; child labour is prevalent due to economic factors that impact on their families such as loss of lands and broader economic issues.

Whilst these examples are at the extreme end of the spectrum in a global context, we acknowledge that there is a low risk of Modern Slavery within our operations in Australia. However, based on our risk assessments, there is a risk of Modern Slavery in certain supply chain categories, such as some imported goods including personal protective equipment and clothing, freight and cleaning services.

Our due diligence ensures we do not invest where there is a heightened risk of Modern Slavery, this includes where the gold is processed. The Perth Mint, in Western Australia, is certified under the international Conflict-Free Smelter Program - a validation that metals passing through the refinery are from trustworthy sources.

Pleasingly, 2021 has seen the quality of publicly accessible Modern Slavery information increase exponentially, whether it be public companies Modern Slavery Statements, proxy advisor or ESG ratings agency reports.

As evidenced by our historic achievements and our planned future actions, we continue to strategically adapt our approach to Modern Slavery to what is considered 'best practice' within the public domain and what is appropriate for Gold Road's risk profile and business complexity – for example we proactively seek continued engagement with our suppliers, contract partners, external agencies and monitor technology innovations that support the development of more sophisticated risk assessment processes.

We look forward to continuing to transparently disclose our evolving approach to Modern Slavery risks and we trust this Statement provides clear insights on advancements post our inaugural 2020 Modern Slavery Statement.



Duncan Gibbs
Managing Director
and CEO

1. Introduction

This Modern Slavery Statement (the Statement) for Gold Road Resources Limited (Gold Road or the Company) for the calendar year ending 31 December 2021 is our second Statement. The Statement summarises Gold Road's response to the criteria mandated for public reporting in accordance with the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act) and has been approved by the Gold Road Board.

Gold Road is committed to respecting and protecting human rights and believes that all people should be treated with dignity and respect, in line with our values "We care for the wellbeing of all" and "We act with integrity". We are working to align our business activities and practices with the UN Guiding Principles on Business and Human Rights.

Respect for Human Rights is embedded in our Human Rights Policy, People Policy, Corporate Code of Conduct, Supplier Code of Conduct and the Diversity and Inclusion Standard. Gold Road has a well communicated Whistleblower and Grievance reporting process. Human Rights risks are captured in Gold Road's risk management system together with corresponding risk mitigation strategies.

Gold Road utilises the UN Guiding principles to understand its Modern Slavery risks, which sets out a three-part continuum to explain how businesses can be involved in human rights impacts, such as Modern Slavery:



CAUSE: Businesses can be involved in Modern Slavery where their actions directly result in Modern Slavery practices occurring. For example, a company may run a manufacturing facility using exploited labour.



CONTRIBUTE: Businesses can contribute to Modern Slavery where their actions or omissions are so significant that the abuse would have been unlikely without them, including where their actions or omissions facilitate or incentivise Modern Slavery. For example, a food and beverage company may engage a low-cost labour hire provider to supply migrant labourers for harvest season despite knowing that the contract amount would not enable the labour hire provider to fairly pay the workers.



DIRECTLY LINKED: Businesses can be directly linked to Modern Slavery where they are connected to Modern Slavery through their products, services or operations (including through the actions or omissions of suppliers beyond the first tier). For example, a professional services company may purchase IT equipment which was manufactured using components from a supplier that were made using forced labour.

The 'cause', 'contribute', and 'directly linked' framework is intended to serve as a continuum of conduct rather than clearly delineated categories. In the Modern Slavery context, this continuum provides an important tool for businesses to understand and meaningfully explain the different ways that they may be at risk of potentially being involved in Modern Slavery.

This Statement sets out the actions taken by Gold Road to identify, manage and mitigate the specific risks of Modern Slavery in the operations and supply chain.

Gold Road's policies, standards and reporting suite, including the 2021 Annual Report, 2021 Sustainability Report and 2021 Corporate Governance Statement, are available on our website goldroad.com.au.

2. Collaboration

Picture Right
Pit Wall Gruyere



Gold Road is collaborating with our peers within the mining industry to improve our understanding and inform our approach to Modern Slavery. We are a member of industry groups including the Chamber of Minerals and Energy, the Association of Mining and Exploration Companies and the Gold Industry Group. We recognise the value of collaborating with our industry peers to share experiences, resources and build best practices in our approach to human rights and sustainable business practices.

Gruyere, through the operator Gold Fields, is a founding member of the Human Rights Resources & Energy Collaborative Working Group (formerly known as the WA Modern Slavery collaborative (WAMSc)), which consists of 21 member companies who have a collective focus with respect to the eradication of Modern Slavery from their supply chains.

WAMSc developed the supplier self-assessment questionnaire (Supplier SAQ) which Gold Road has adopted.

The Supplier SAQ is designed to support the identification of Modern Slavery risks, foster collaborative efforts between suppliers and organisations to address those risks, improve supply chain transparency, and identify areas for further due diligence. To assist in educating suppliers on what Modern Slavery is, the Supplier SAQ is accompanied with a "Frequently Asked Questions" pamphlet, which also explains how to complete the questionnaire. The Supplier SAQ has been translated into Chinese, Spanish, and Portuguese.

WAMSc was the recipient of a noteworthy award under the banner of 'In-house legal team: Social Justice' lawyersasia.live.ft.com.

3. About this Statement

Picture Right
Gruyere Process Plant Infrastructure



This Statement is a joint statement comprising the following reporting entities (**Reporting Entities**) under the Modern Slavery Act:

- Gold Road Resources Limited (ACN 109 289 527), which is the ultimate holding company of the Gold Road Group
- Gold Road (Gruyere) Pty Ltd (ACN 612 071 306)

This Statement relates to wholly owned and/or operated assets by Gold Road. It does not cover assets owned as a joint venture but not operated

by Gold Road, in particular the Gruyere gold mine which is operated by a wholly owned subsidiary of Gold Fields Limited (**Gold Fields**). However, as the Gruyere Gold Mine is a material asset to Gold Road, we have included pertinent information on Gold Fields’ approach to the Modern Slavery Act, and where further information can be obtained.

The table below sets out the mandatory reporting requirements of the Modern Slavery Act and where each has been addressed within this Statement.

Modern Slavery Act Mandatory Reporting Requirements	Section
Identify the reporting entity	About this Statement
Describe the reporting entity’s structure, operations and supply chain	Our Structure and Operations Our Supply Chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Modern Slavery Risks in Our Operations and Supply Chain
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Actions Taken to Address Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of these actions	How We Assess the Effectiveness
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation and Approval
Any other relevant information	Gruyere Gold Mine

4. Key Achievements 2021

 **Training and Awareness:** Continued to deliver modern slavery awareness and compliance training to our people

 **System Automation:** Continue development of our Supplier Management System to assist with identifying and managing Modern Slavery risk

 **Due Diligence:** Continue to perform due diligence on our highest risk suppliers and expand usage of the Supplier Self-Assessment Questionnaire

 **Supplier Engagement:** Continue to engage with our suppliers to determine the extent to which Modern Slavery risks are adequately managed

Remediation plans to be developed should further action be required

Training and Awareness

We formally rolled out the Modern Slavery Framework as mandatory online training compliance for the Board, Executive and Senior Leadership Teams, the Finance Team and all employees performing a role in procurement in July 2021. The training encompasses:

- Context setting
- Gold Road’s commitment to eliminate Modern Slavery within our operations and supply chain
- Gold Road employees, contractors and suppliers responsibilities (‘Whistleblower’)
- Gold Road’s Modern Slavery approach including collaboration objectives
- Gold Road’s actions completed and future planned actions

Training completion rate was 100% of targeted workforce. New employees are required to complete the Modern Slavery eLearning during the onboarding process.

System Automation - Supplier Module

To assist with recording, managing and monitoring Company Risks, Events, Interactions, Actions, Health, Stakeholder Engagements, Governance, Social, Compliance and Audit, Gold Road utilises an online modular software application. This solution includes a supplier module which will require new and renewing Tier 1 suppliers to complete a Supplier SAQ and provide substantiation as part of our ‘new supplier’ establishment. This supplier module is expected to be fully operational in 2022 and will include appropriate supplier engagement during its implementation.

Due Diligence

Gold Road classifies its Suppliers into Tiers:

- **Tier 1 Suppliers** are suppliers that directly supply goods, materials or services (including IP/ patents) to Gold Road.
- **Tier 2 Suppliers** and their Suppliers are suppliers who provide their products and services to a Tier 1 supplier.

Based on the classification, Gold Road utilises the ‘cause, contribute and directly linked’ framework to identify those suppliers whose goods or services may be in the higher risk category and conducts deeper due diligence to understand their Modern Slavery risk.

Our supplier profile details for 2021 and 2020 are listed in the following table.

Tier 1 Supplier Profile		2021	2020
No. of Suppliers		360	390
No. of Suppliers > \$100,000 p.a.		55	33
No. of Suppliers \$10,000 - \$100,000 p.a.		136	134
No. of Suppliers < \$10,000 p.a.		169	223
No. of Modern Slavery Supplier SAQ's received		138	16
Total Supplier Spend	A\$M	41.2	31.8
Tax, Government Payments	A\$M	5.1	5.0
Targeted Supplier Spend	A\$M	36.1	26.8
Modern Slavery Supplier SAQ Spend	A\$M	26.2	14.0
Percentage of Spend covered by Supplier SAQ's		73%	52%

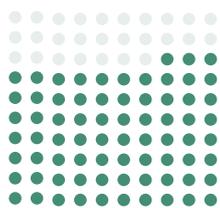
Picture Right

Yamarna remote exploration camp



138
completed
Supplier SAQ's

\$26.2M
combined
expenditure



representing
73% of our 'at
risk' supplier
expenditure

2020 Recap

Our targeted Modern Slavery focus in 2020 was Tier 1 Suppliers with an annual spend of at least \$100,000, of which 33 suppliers were identified. Of the identified suppliers:

- Eighteen Supplier SAQs were sent with 16 responses (89%) received
- Eight were one-off suppliers and/or no longer supply to the Company
- Seven suppliers included joint venture cash call accounts, sponsorships and insurance providers that are deemed no risk.

The 16 Tier 1 Suppliers with returned Supplier SAQ's had a combined expenditure of \$14 million in 2020.

A ranking mechanism was applied to the 16 Supplier SAQ's received with all suppliers identified as low risk.

2021

In 2021, the Supplier SAQ analysis initially targeted all suppliers not reviewed in 2020 yet considered to be in or connected with the higher risk industries listed below:

- Personal protective equipment and clothing
- Transport (freight is predominantly land based trucking, with some strategic use of air freight)
- Controlled waste
- Cleaning services
- Labour hire

We ultimately sent Supplier SAQ's to other Suppliers after we had worked our way through the higher risk industry suppliers. We have received 138 completed Supplier SAQs with a combined expenditure of approximately \$26.2 million, representing 73% of our 'at risk' supplier expenditure. The ranking mechanism applied to the 138 completed Supplier SAQ's identified one supplier with a risk profile slightly above low risk. This risk rating was assigned because the supplier did not have a Modern Slavery framework (policies, processes, training) in place nor was there evidence that the supplier had undertaken any due diligence on its own supply chain. We are working with this supplier to improve the level of Modern Slavery awareness and compliance within their organisation, and we will be asking them to complete another Supplier SAQ in early 2022.

Supplier Engagement

Our suppliers have varying levels of understanding of Modern Slavery risks. Gold Road's philosophy is focused on capacity-building through raising awareness, working with the supplier to reduce Modern Slavery risk exposure throughout their supply chain, and taking appropriate action in relation to identified issues.

Removing a supplier from our approved supplier list will only be considered after appropriate consultation and educational awareness. For example, when a supplier is unwilling to engage constructively either in Gold Road's due diligence / risk screening process, or in remediating / mitigating any identified Modern Slavery issues.

5. About Us



5.1 Our Structure and Operations

Gold Road is a mid-tier gold mining and exploration company. Gold Road is structured as a public listed company on the Australian Securities Exchange (ASX), and has its headquarters in Perth, Western Australia. Its current operations are all located in Western Australia.

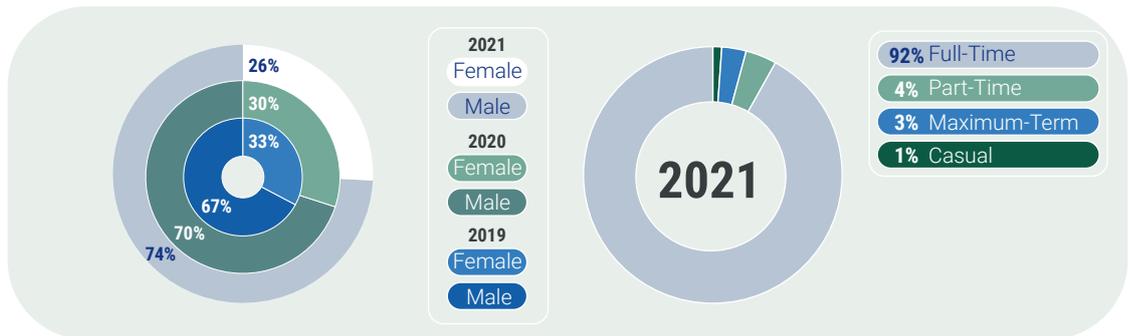
Gold Road has nine subsidiary entities (group subsidiaries), with three being holding companies, three involved in exploration (North Yamarna, South Yamarna and Yandina) and two subsidiaries utilised for equity investments in Australian listed gold explorers.

Figure Above
Gold Road's project locations in Western Australia



Gold Road's main operations include:

- Its 50% joint venture interest in the Gruyere Gold Mine in partnership with Gold Fields. The Gruyere Gold Mine is located in the north-eastern Goldfields in Western Australia and is managed and operated by a wholly owned subsidiary of Gold Fields, Gruyere Management Pty Ltd. All Gruyere employees and contractors are employed and contracted by the operator.
- Its wholly owned and managed exploration project, Yamarna, located approximately 200 kilometres north-east of Laverton, in the north-eastern Goldfields in Western Australia. All employees and contractors are employed or contracted by Gold Road.
- Its joint ventures with Cygnus Gold Limited, the Yandina JV and Lake Grace JV, together the Yandina Project, located in the wheatbelt area in south-west of Western Australia. The Yandina Project was managed and operated by Cygnus Gold Limited up until 30 September 2020. From 1 October 2020 until 31 December 2021, Gold Road was the manager and operator. The manager and operator is responsible for employing and contracting all personnel. At the end of 2021, Gold Road made the decision to exit the Yandina Project.

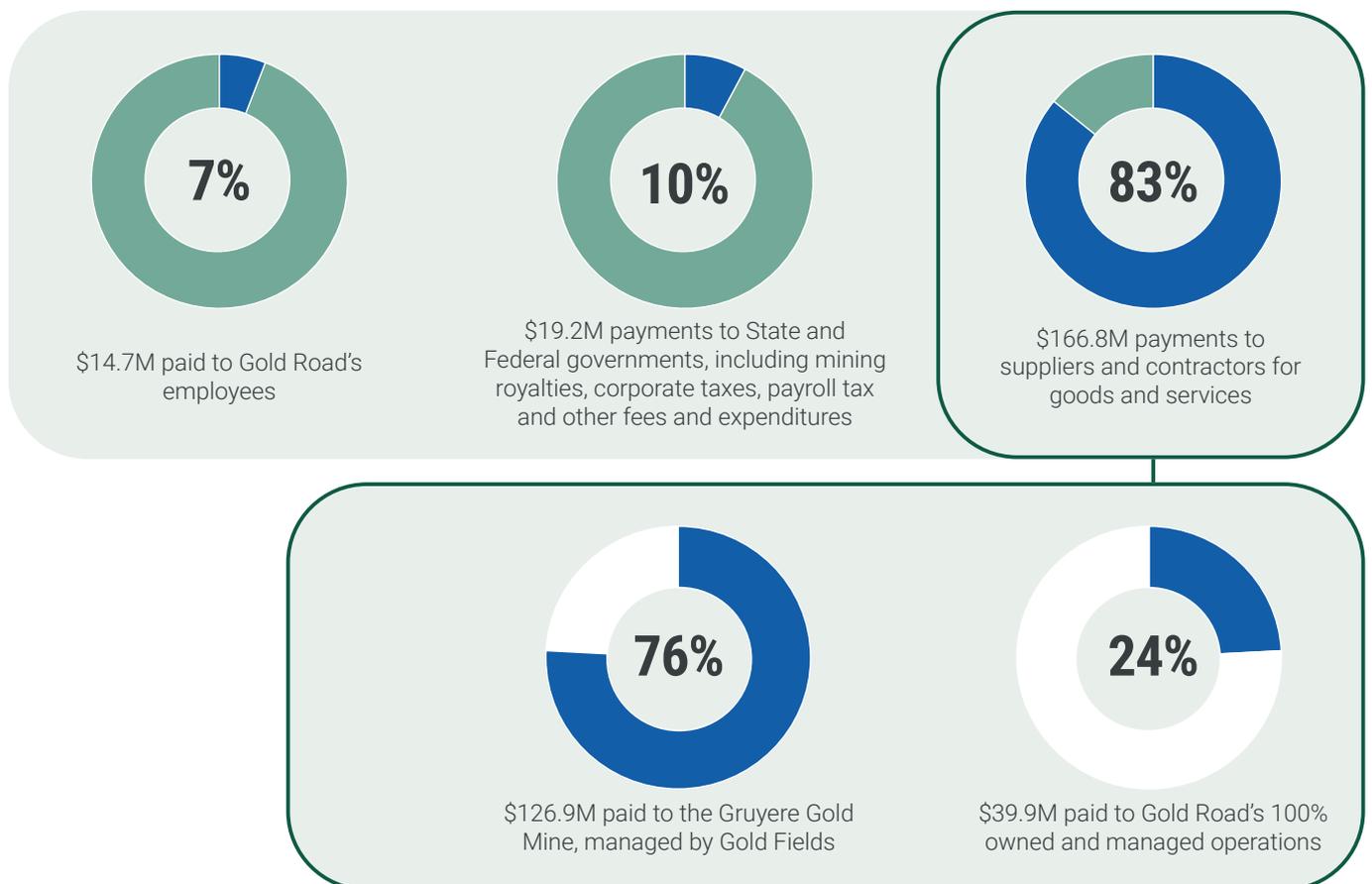


Gold Road has no discernible customers from the sale of its 50% share of gold and silver produced from the non-managed Gruyere Gold Mine, our gold and silver is transacted on the external London Bullion market. Gold Road uses the Perth Mint, located in Western Australia, to smelt and refine its gold and silver. The Perth Mint is certified under the international Conflict-Free Smelter Program - a validation that gold and silver passing through the refinery is from trustworthy sources.

On 31 December 2021, Gold Road had 73 employees, including 67 full-time, three part-time, two maximum-term and one casual.

Gold Road personnel are employed under Common Law Contracts which comply with the relevant employment legislation and practices, including Modern Awards and have been reviewed by an independent external legal service provider to ensure compliance with the Fair Work Act. Therefore, our employees are not covered by enterprise bargaining agreements. An internal audit of our payroll processes was completed in 2021, with no material issues identified. There were no strikes or lockouts during the 2021 reporting period.

Gold Road's total 2021 cash outflow was **\$200.7 million**¹



¹ The origin of the suppliers and contractors payments for goods and services is the accounts payable system, meaning cash expenditures are being reported here, as opposed to accrued numbers provided in the 2021 Annual Report.

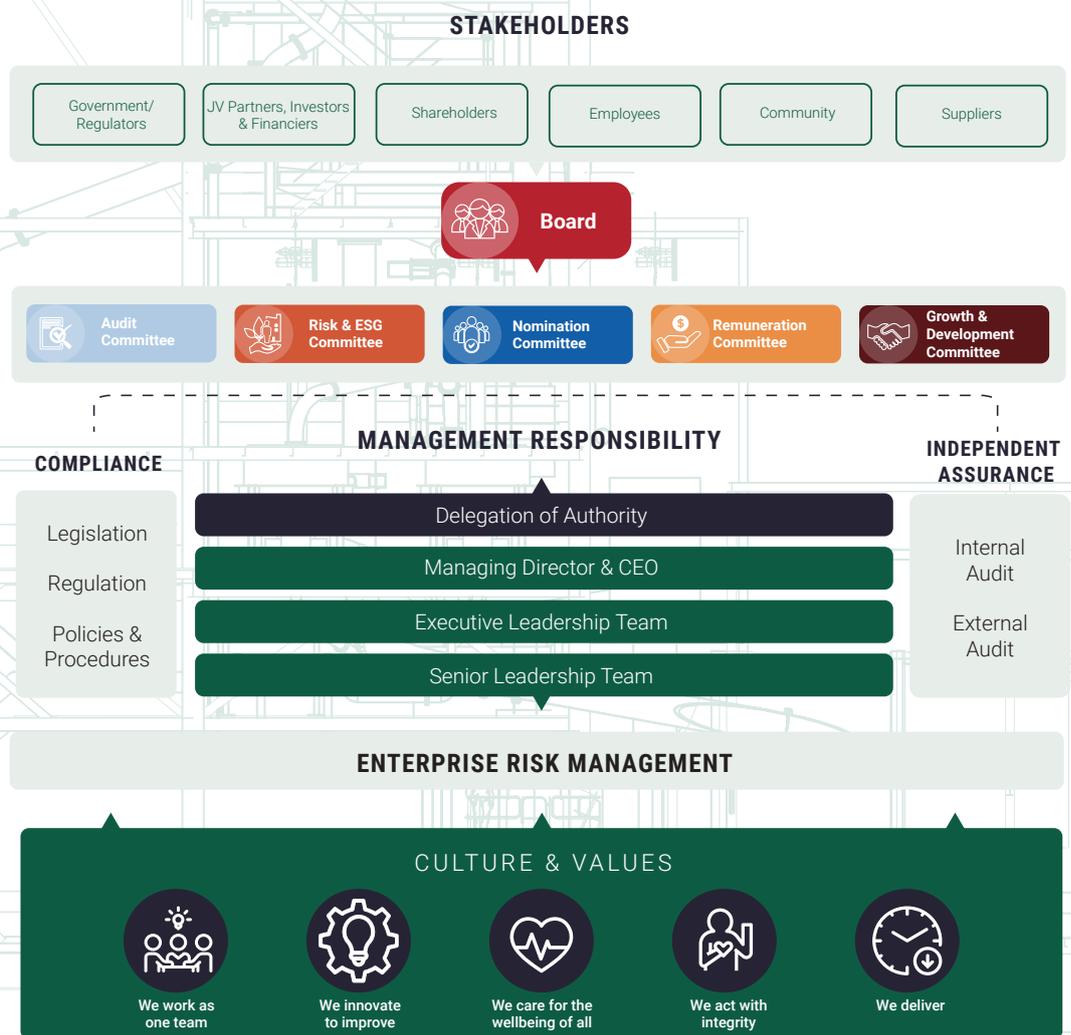
5.2 Governance Framework

Governance is essential to our sustainable long term success, driving value creation and positive outcomes for our stakeholders. Our approach to corporate governance is outlined in the 2021 Corporate Governance Statement, available on our website goldroad.com.au.

The Board is responsible for oversight of all sustainability issues with the Risk and ESG Committee accountable for ensuring the effective management of human rights related risks, including Modern Slavery.

An understanding and adherence to our policy framework by our employees and suppliers is of the upmost importance to deliver meaningful change in Gold Road’s approach to its Modern Slavery approaches.

Figure Right
Gold Road’s Corporate Governance Framework

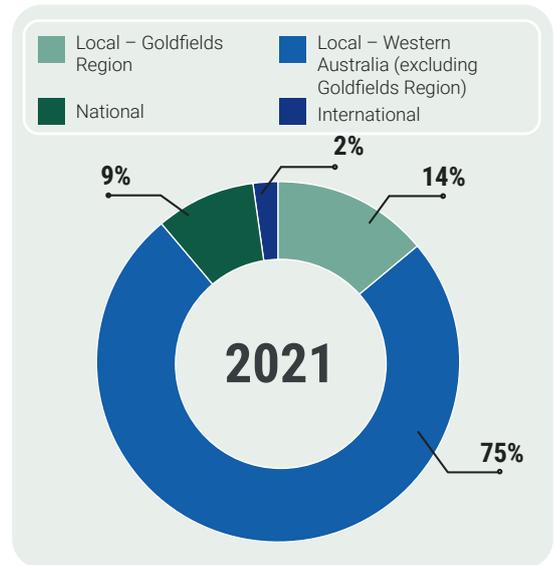


5.3 Our Supply Chain

Gold Road aims to create economic opportunities in the communities in which it operates through local employment, and by engaging with our local communities to procure products and services for our Company.

Gold Road directly managed approximately \$36.1 million in procurement expenditure in 2021, of which 98.4% was paid to suppliers located in Australia and 1.6% was paid to internationally located suppliers. Of the Australian suppliers, 90% was paid to suppliers in Western Australia, including 14.1% to the local community (which includes City of Kalgoorlie-Boulder and Shires of Laverton, Leonora and Menzies).

While our due diligence and engagement with our suppliers is showing the Modern Slavery risk relating to Gold Road’s Tier 1 Suppliers is low, we are mindful that the second (and subsequent) tiers of our supply chain could have more diverse international supply chains that potentially source supplies and utilise labour from higher-risk countries. Many of our larger suppliers are pro-active in this area, and we recognise that there are opportunities for us to learn and improve based on the experiences of our own suppliers, as well as assisting in building capacity where that is required.



Supply Chain by Sector	2020	2019
Local – Goldfields Region ²	7%	8%
Local – Western Australia (excluding Goldfields Region)	76%	76%
National	16%	15%
International	1%	1%

Direct Supply Chain

During 2021, Gold Road’s direct supply chain included suppliers of products and services used in exploration across a wide range of categories, including:

- Exploration drilling
- Assaying
- Earth moving contractors
- Engineering and construction services
- Airborne and ground geophysics
- Heritage surveys
- Diesel fuel
- Personal protective equipment and clothing
- Energy and utilities
- Freight transporters and food.

Supply Chain

Gold Road’s supply chain also involved corporate office and technical activities, including:

- Geological and mining professionals
- Accountants, lawyers, financial and tax advisors
- Information and communication technology services and software
- Office rental and associated cleaning and maintenance cost
- Electronic hardware and stationery.

² Gold Road defines ‘local’ firstly as the Goldfields Region (City of Kalgoorlie-Boulder, Shires of Menzies, Leonora, and Laverton) and secondly, the rest of Western Australia.

6. Modern Slavery Risk is in our Operations and Supply Chain

While Gold Road is not aware of any Modern Slavery in its operations and supply chains, Gold Road recognises that Modern Slavery can occur in every industry, sector or geographic location. Accordingly, we recognise there is a risk of Modern Slavery in our operations and supply chains.

Location	Risks
Our Operations	Gold Road is comfortable that its employment practices eliminate the risk of Modern Slavery within its owned and controlled operations. Our employees are all employed within one jurisdiction (Western Australia) and are paid above living wages. Gold Road is vigilant in ensuring Modern Slavery risks are regularly assessed for current and emerging trends, against the UN Guiding principles of Cause, Contribute and Directly Linked, concurrently ensuring we are proactive in relevant workforce training and education. (More information see 2021 Sustainability Report)
Our Supply Chains	<p>We recognise the risk of Modern Slavery in our supply chains, in particular where we do not have a direct contractual relationship with a Tier 2 (or lower) supplier (i.e. the suppliers of our suppliers), with various inputs which may be sourced from known potential high-risk areas.</p> <p>We also recognise the potential risk that Gold Road could contribute or be directly linked to the risk of Modern Slavery in our supply chains through our actions, for example, by setting cost targets or contracting at rates that may increase the risk of exploitative labour practices by our suppliers.</p>
Non-operated Joint Ventures	<p>Gold Road’s primary asset is its non-managed interest in the Gruyere Gold Mine. The potential for Modern Slavery risks is greater given the scale of operations, the total supplier spend and the number of direct (and indirect) suppliers.</p> <p>Gold Road’s focus on engagement with our joint venture partners is to understand their existing approach, alignment with the UN Guiding principles (Cause, Contribute, Directly Linked) and future plans to manage Modern Slavery risks, and identify opportunities for collaboration.</p>
Equity Investments	<p>Gold Road has previously had equity investments in Australian listed gold explorers.</p> <p>We conduct due diligence on our equity investments which have a similar risk profile to non-operated joint ventures, however, the risk may be higher with equity investments due to less access to information and less ability to influence management than non-managed joint ventures.</p>

The risk factors that contribute to Modern Slavery are varied and complex. Our approach to assessing supply chain risk is based on product, sector, geographic and entity risks combined with the Cause, Contribute and Directly Linked principles.

Risk Area	Risks
Sector (Industry)	Certain sectors or industries have higher Modern Slavery risks because of characteristics, products and processes. For example, where the use of unskilled or temporary labour is prevalent, or where tasks are undertaken in an environment that is not openly visible (e.g. cleaning or security that are often undertaken outside of core business hours).
Product/Services	Certain products or services have higher Modern Slavery risks because of the way they are produced, provided or used. For example, where a product is made from materials or components reported to have a high risk of labour exploitation by international organisations (e.g. protective clothing).
Geographic Risks	Some countries have higher risks of Modern Slavery due to poor governance, weak rule of law, conflict or poverty. These countries are likely to have inadequate protections for workers, and limited capacity to monitor workplace standards and enforce compliance with national or international standards.
Entity Risks	Some entities may have Modern Slavery risks due to poor governance structures, a record of treating workers poorly, or a public record of human rights violations.

7. Actions Taken to Address Modern Slavery Risks

Gold Road Core Values



We care for the wellbeing of all



We act with integrity



We deliver



We work as one team



We innovate to improve

7.1 Our Commitment

Gold Road seeks to create positive social impacts by minimising human rights related risks and promoting respect for human rights across our operations and activities.

Gold Road is committed to respecting human rights and believes that all people should be treated with dignity and respect, in line with our values “We care for the wellbeing of all” and “We act with integrity”.

Specifically, regarding Modern Slavery, we will seek to eliminate Modern Slavery within our operations and supply chain by:

- Ensuring that all our employees work for us voluntarily and can provide evidence that they are older than the minimum working age in the jurisdiction in which they work
- Ensuring that all our employees are paid at least the minimum wage in the jurisdiction in which they work
- Seeking to engage contractors and suppliers who uphold our commitment to eliminating Modern Slavery practices
- Requiring our suppliers to agree to comply with our Code of Conduct and other related policies in relation to their own operations and supply chains
- Undertaking annual due diligence on our supply chain to identify and address any actual or potential risks of Modern Slavery
- Working with our suppliers to assist them to identify and manage the risk of Modern Slavery within their operations and supply chain

- Making our Whistleblower and Grievance reporting process available to employees, our suppliers and their employees.

Gold Road expects that anyone involved with our business will report known or suspected cases of Modern Slavery, violations of the Code of Conduct or other ethical standards.

We expect our suppliers to create processes for raising grievances. Retaliation against those who raise concerns is strictly prohibited.

7.2 Policies and Procedures

Our commitment to human rights is enshrined in our Code of Conduct, Human Rights Policy and Supply Policies and Processes. The Policy Statements are aligned to the International Council on Mining and Metals performance expectations on Human Rights and is guided by the UN Guiding Principles on Business and Human Rights as well as the conventions of the International Labour Organisation. The Policy Statement also supports the United Nations Universal Declaration on Human Rights and the Voluntary Principles on Security and Human Rights.

Internal policy and training updates are disseminated to the general workforce via multiple mediums, such as email, pre-start meetings, monthly office briefings, business partner quarterly meetings, and directly to relevant persons through our learning management application. Question and answer sessions are also conducted with focused workgroups.

Our Code of Conduct, Human Rights Policy and Supplier Code of Conduct are publicly available and can be viewed on our website goldroad.com.au.

7.3 Code of Conduct

Gold Road’s Code of Conduct (Code) demonstrates how we practically apply our values. The Code explains the principles and intent behind many of our standards and procedures that are applicable company-wide. All employees, directors, officers, contractors and suppliers, and controlled entities must adhere to the Code, regardless of location or role.

7.4 Human Rights Policy

Gold Road’s Human Rights Policy sets out our commitment to respect the internationally recognised human rights of all people, including our employees, the communities in which we operate, our suppliers, and those working within our supply chains. The policy sets out our commitment to undertake appropriate due diligence to identify, prevent and mitigate, engaging in business activities where it could be complicit in Modern Slavery / human rights abuses, and provide a means to remedy through effective grievance mechanisms.

7.5 Supply Policies and Processes

Gold Road’s supplier Code of Conduct sets out the minimum requirements that we expect suppliers to comply with, and the higher standard that Gold Road adopts and encourages our suppliers to share. Gold Road requires suppliers to comply with applicable Modern Slavery laws and internationally proclaimed human rights, including freedom from forced labour and child labour. Our internal Purchasing and Contracting Standard provides internal governance related to the contracting of goods and services, including our approach to supplier engagement and contract monitoring.

We conduct Supplier risk assessments in accordance with our Purchasing and Contracting Standard. All new and renewing suppliers, are subjected to our risk assessment process, prior to onboarding or contract award. This includes the requirement to complete a Supplier SAQ³ and provide substantiation.

Supplier engagement occurs throughout the risk assessment process with clarifications sought, continuous improvement plans discussed and agreed, and reliance placed on credible written resources and tools (both internal and external). For example, an Internet search for anything untoward in the public domain is performed. Greater scrutiny is applied to suppliers in higher risk sectors and products (more information: Due Diligence section).

Whilst the Supplier SAQ is a valuable tool, Gold Road appreciates that it should not be relied upon as the sole measure of a supplier’s Modern Slavery compliance risk. Gold Road’s Modern Slavery Risk Framework incorporates data from other reference sources (e.g. globalslaveryindex.org; ucdp.uu.se; ilo.org; oric.gov.au; asic.gov.au), which are designed to moderate supplier human rights self-assessment scores and provide a more holistic assessment.

Gold Road welcomes feedback or concerns from its stakeholders and has established an independent, confidential and anonymous hotline which stakeholders can use to report any potential or actual breaches of our Human Right’s Policy, Corporate Code of Conduct, Supplier Code of Conduct or any other human rights violation. All reports are treated with the appropriate seriousness, complaints and grievances are responded to and we aim to resolve any issue, if verified, as soon as possible. Information on how to access the hotline is in our Whistleblower Policy available on our website goldroad.com.au.

Gold Road’s Golden Commitment to “Speak Up” encourages employees to talk with their leaders or a People and Culture representative to share concerns about inappropriate behaviour. Our Harassment, Discrimination and Bullying Policy ensures unlawful conduct is reported and managed fairly. The 2021, Annual Employee Engagement and Culture survey validate our Whistleblower and grievance mechanisms as trusted and accessible.

We are committed to remediation where we identify that we have caused or contributed to Modern Slavery. We favour working with suppliers to resolve or mitigate issues instead of ending the relationship with the supplier because of the potential adverse effects on the livelihood of the supplier and its employees.

If a supplier or other entity is found to be in material breach of the terms stipulated in their contract with us, including the Supplier Code of Conduct, we can suspend or terminate the contract with that supplier. However, our preference is to adopt a partnership-based approach, and where possible and depending on the circumstances, we would try and work with the supplier to resolve any issues in a reasonable timeframe.

No Modern Slavery cases have been uncovered to date in either Gold Road’s 100% owned operations or its supply chain and there were no reports made to our Whistleblower hotline in 2021.



8. Gruyere Gold Mine

The Gruyere Gold Mine is operated and managed by our joint venture partner, Gold Fields.

Gold Fields has a well-developed strategy for Modern Slavery for its Australian operations and has published its own Modern Slavery Statement which is available on the Modern Slavery Register.

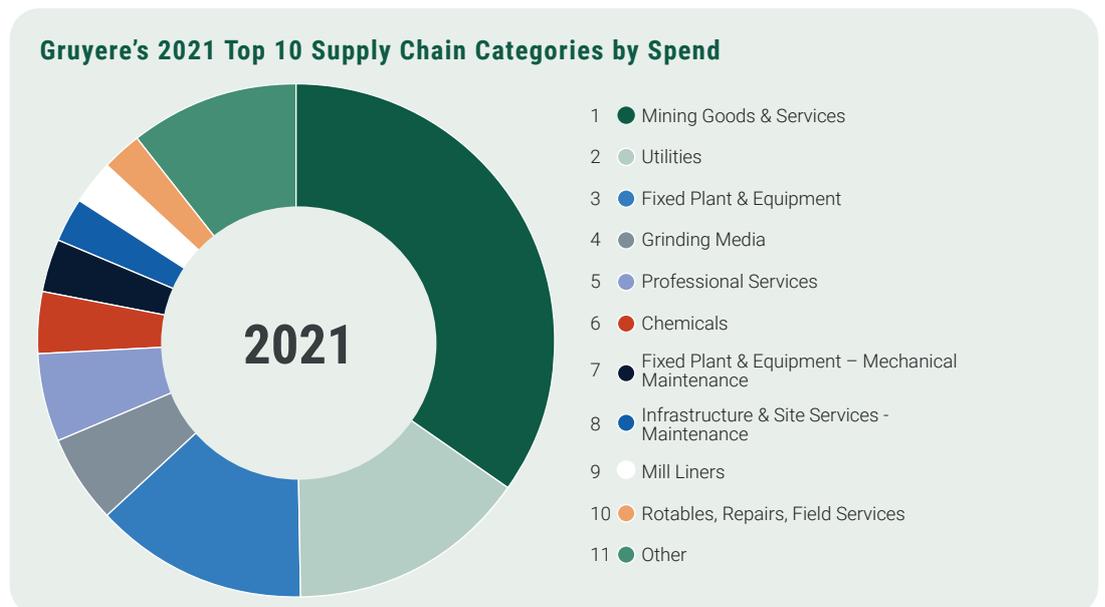
Gold Fields relies upon a network of domestic and international suppliers to provide the necessary products and services to support their Australian operations, including Gruyere. In Australia, 99% of procurement is from in-country suppliers, and in 2020, of the 99%, 23% was sourced from host community suppliers⁴. Gold Fields determine the risk of modern slavery in their first tier suppliers, in Australia, is low. However, through due diligence and SAQs Gold Fields identified a small number of historical cases where employees hired from overseas were required to pay labour hire recruitment fees. To remediate, in 2020, Gold Fields reimbursed those employees the recruitment fees and made a change to Company policy regarding such fees.

Joint Venture Consultation

Gold Road works closely with Gold Fields in relation to human rights risks, and in particular Modern Slavery. Gold Road maintains a strong oversight of the Gruyere operation through the JV Management Committee which meets quarterly and the JV Technical Committee which meets monthly. Both JV partners have equal representation on the Committees, sharing the Chair role which rotates annually between Gold Road and Gold Fields.

Gruyere Structure and Operation

In 2021, the Gruyere Gold Mine had a total workforce of 496 personnel, comprising 165 Gruyere employees and 331 contractors. Gruyere's procurement spend, in 2021, was ~\$350 million, of which 99% was in Australia and 13.3% was with host community suppliers.



⁴ Gold Fields defines 'host community' as Australian registered businesses with a physical presence in the Eastern Goldfields region of Western Australia.

9. How We Assess our Effectiveness

As we evolve our approach over the coming year, we will continuously review the effectiveness of our approach to Modern Slavery risk management by:

- Assessing our governance approach, policies, management systems and procedures to ensure we effectively address risk of Modern Slavery within our operations and supply chain (e.g. measure increases in workers’ and suppliers’ awareness of Modern Slavery after training)
- Reviewing our risk management practices within our operations and supply chain
- Responding promptly to investigate complaints and grievances raised through Gold Road’s reporting mechanisms, and tracking the number of Modern Slavery incidents identified and remedied
- Seeking and using feedback from external sources to identify continual improvements
- Regular reporting to the Risk and ESG Committee on sustainability and human rights

10. Looking Forward

Gold Road’s priorities for 2022 include the following:

Internally to:

- Improving the quality of the information that we are collecting from our suppliers and our ability to understand it, including desktop due diligence reviews of perceived higher risk suppliers, confirm governance frameworks in place for identifying, preventing, and handling Modern Slavery
- Through our tendering process and management system, continue to broaden and challenge supplier and contractor responses
- Perform a second Modern Slavery gap risk analysis of our policies, management systems and procedures
- Transition from measuring quantitative outputs (such as number of workers trained) to more practical and qualitative outcomes (such as measurable increases in workers’ awareness of Modern Slavery after training), to further define and report effectiveness measures

- Continue to test our grievance mechanisms are trusted and accessible to stakeholders, ensuring they can receive and immediately escalate Modern Slavery complaints.

Further ‘deep dives’ into Modern Slavery risks beyond Tier 1 Suppliers will target :

- Suppliers that provide Modern Slavery Statements - are independently ranked on the quality of their Modern Slavery reporting by several organisations, with the supplier’s Modern Slavery reports providing insights into any issues and the supplier’s actions to address.
- Suppliers that don’t provide Modern Slavery Statements – where we need to consider if the products or services, geographic location or specific entity issues places the supplier in a high risk category, requiring a deeper bespoke assessment.
- All ‘Tier-suppliers’ where workers at our sites or in our supply chains are, where possible, provided with access to information about their rights, obligations, and ways to access support, i.e. strategic 360-degree feedback to be sought from suppliers’ workers.

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11. Consultation and Approval

Gold Road developed this joint statement in consultation with each reporting entity covered by this Statement.

The boards of directors of all the reporting entities comprise a small number of common officeholders who are Gold Road Directors or members of the Executive Leadership Team. By virtue of their senior positions, the officeholders of these companies have a deep understanding of Gold Road's businesses, operations and supply chains across all entities.

This Statement has been approved for release by the Board of Gold Road Resources Limited on its own behalf and on behalf of its wholly-owned subsidiary on 25 March 2022.

Duncan Gibbs
CEO and Managing Director

Modern Slavery Statement