



**GOLD
ROAD**
RESOURCES

**MODERN
SLAVERY
STATEMENT**

2022



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Modern Slavery Act Mandatory Reporting Requirements	Section
Identify the reporting entity	Introduction
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	Our Ongoing Approach to Address Modern Slavery Risks in Our Business
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

Managing Director's Message

I am pleased to present our Modern Slavery Statement covering the 2022 calendar year.

Gold Road strives to protect the people and communities associated with our activities and operations (including our supply chain). As with all our non-financial reporting disclosures, Gold Road takes a 'beyond compliance' approach to its reporting, specifically regarding Modern Slavery, where we are committed to protecting vulnerable people and groups.

Our due diligence ensures we do not invest where there is a heightened risk of Modern Slavery, this includes where we process our gold. 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.

Our approach to identifying and addressing risks in our business has led us to focus our activities on higher risk supply chain categories, such as personal protective equipment and clothing (**PPE**), freight and cleaning services. Training, policies, contract terms and conditions, engagement with our suppliers are examples of some of the key pillars that support our approach.

Pleasingly, there have been no Modern Slavery cases 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 2022.

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. We engage with our suppliers and contract partners regularly regarding their business practices and, where required, provide assistance and training on Modern Slavery and Human Rights.

We ensure our workforce's knowledge is up to date. In 2022, our people completed 105 hours training on reviewing Human Rights and Modern Slavery risks in the supply chain. Additionally, multiple external and internal focus sessions were spent on the new Supplier Management and Compliance module, followed by many one-on-one Supplier Manager sessions - this amounted to approximately 100 hours collectively.

We monitor technology innovations that support the development of more sophisticated risk assessment processes, for example we utilise intelligence risk software for due diligence checks on our supply chain, and we also note with interest the increasing use of Artificial Intelligence (AI) to analyse company statements and highlight areas for improvement.

We will continue to disclose our evolving approach to Modern Slavery risks and we trust this Statement provides clear insights on advancements made to date.

Duncan Gibbs
Managing Director and CEO

01 Introduction

This is Gold Road Resources Limited's (**Gold Road** or the **Company**) Modern Slavery Statement for the calendar year ended 31 December 2022. This Statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and approved by the Gold Road Board.

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 Gold Road's wholly owned and/or operated assets. 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.

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 do not abide or support, through our supply chain, child labour, forced or compulsory labour, people trafficking or any other form of slavery-like practices.

Gold Road supports the United Nations Guiding Principles on Business and Human Rights, and we continue to work on aligning our business activities with best practices.

Respect for human rights is embedded in our Human Rights Policy, People Policy, Corporate Code of Conduct, Supplier Code of Conduct and our Diversity and Inclusion Standard – copies available on our website goldroad.com.au. Gold Road has a well communicated Whistleblower and Grievance reporting process.

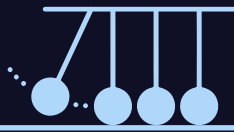
Human Rights risks are captured in Gold Road's risk management system together with corresponding risk mitigation strategies. To understand our Modern Slavery risks, the Company draws on the UN Guiding Principles three-part continuum that explains how businesses may be involved in human rights impacts, such as Modern Slavery.

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.

Based on these classifications, 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.

The table on [page 1](#) sets out the mandatory reporting requirements of the Modern Slavery Act and where each has been addressed within this Statement.

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



Cause

Businesses can be involved in Modern Slavery where their actions directly result in Modern Slavery practices occurring. For example, exploitation of workers where a company sets unfair and unreasonable working conditions.



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 company may engage a low-cost labour hire provider to supply migrant labourers 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 company may purchase equipment which was manufactured using components from a supplier in a region that engages in forced labour practices.



02 Collaboration

Gold Road collaborates with its peers across the mining and resources sector, industry groups and associations to improve our understanding, share experiences, resources and build best practices in our approach to Human Rights, Modern Slavery and sustainable business practices more broadly.

Human Rights in Energy and Resources Collaborative (HRREC)

Gold Road's Gruyere JV partner Gold Fields is a founding member of the Human Rights Resource and Energy Collaborative, a Perth-based group focused on promoting human rights best practices and eliminating potential modern slavery in the energy and extractives sectors. As at 31 December 2022, active HRREC members included Alcoa Inc., AngloGold Ashanti, ATCO Australia, Australian Gas Infrastructure Group, CITIC Pacific Mining, Fortescue Metals Group, Gold Fields, IGO, Iluka Resources, INPEX Corporation, Origin Energy, Perenti, Newcrest Mining, Northern Star Resources, Rio Tinto, South32, Synergy, Talison Lithium, Wesfarmers, Western Power, and Woodside Energy Group.

The HRREC collaborated to develop the Supplier Self-Assessment Questionnaire (**SAQ**) which Gold Road and Gold Fields adopted. The Supplier SAQ was created 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 SAQ is accompanied by a "Frequently Asked Questions" pamphlet, which also explains how to complete the questionnaire. The SAQ has been translated into Chinese, Spanish, and Portuguese.

In late 2022, our JV partner Gold Fields took the opportunity to review and revise the SAQ and has since adopted a SAQ produced by the Property Council of Australia (**PCoA**), which contains additional content explaining the relevant risks. This was viewed as performing a supplier education function in addition to data capture. In addition, the PCoA questionnaire has been further refined and tailored for the resources industry and Gold Fields supplier base. Gold Fields will launch the new SAQ during the 2023 calendar year following the finalisation of a complementary scoring mechanism designed to rate SAQ responses and produce a risk profile. Gold Road will review this tailored approach in 2023 and provided it represents improvement to the existing process, Gold Road will adopt.

03 Key Achievements

Our priority actions in 2020 and 2021 were focused on ensuring that our Modern Slavery Statements followed the criteria mandated for public reporting in compliance with the *Modern Slavery Act 2018* (Cth), reviewing our internal systems and procedures, reviewing and optimising our supplier list, educating our workforce, and commencing due diligence assessments on the highest risk suppliers.

Over that period we received feedback from proxy advisors, ESG research and corporate advisory agencies which we incorporated into our future planning and subsequent execution. The focus has been on:



Training and Awareness: within our workforce raising awareness and delivering compliance training on Modern Slavery



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



Due Diligence: performing due diligence assessments on our highest risk suppliers



Supplier Engagement: engaging with our suppliers and contractors to determine the extent to which Modern Slavery risks are identified and adequately managed within their business



Growth: ensuring Modern Slavery risks are regularly reviewed against Gold Road's business profile with relevant mitigating and preventative controls identified and implemented

In our 2021 Statement we outlined several priority areas for 2022. We committed to undertaking focused Modern Slavery risk assessments, including 'deep-dives' using a range of strategies. Our risk assessments consider if the products or services, geographic location or specific entity issues places the supplier in a high risk category, as well as deepen our understanding of our supply chain, and provide insights into actions suppliers have taken to address or mitigate poor human rights practices. These included:

- Reviewing suppliers' public Modern Slavery Statements

Through the review process we identified a potential modern slavery risk associated with the supply of a particular brand of latex gloves produced from a particular location. In accordance with our principles and procedures we queried the supplier to understand where they procured the product from, specifically asking if they were sourced from a location that was suspected to have poor human rights practices. The supplier was able to confirm the product was not procured from the suspected location.

- Risk assessing suppliers who do not publish Modern Slavery Statements

To assess suppliers who don't provide Modern Slavery Statements we partnered with a global vendor utilising their structured intelligence software to conduct checks on a selection of suppliers we considered may be a high risk. The software provides a risk assessment report on the supplier covering aspects such as Know Your Customer, Anti-Money Laundering, organised crime, sanctions, bribery, corruption, major ESG incidents, and known people infractions. Pleasingly, the reports on selected suppliers did not identify any high risk issues.

03 Key Achievements



In addition to the risk assessments and 'deep-dives' we set internal initiatives to:

- Improve the quality of information gathered from our suppliers

We implemented a new software-based Supplier Management module and compliance program to streamline the set-up, assessment and capture of supplier information into a centralised online portal. The software also delivered a portal for suppliers making it easier for them to respond to requests for information such as completing the Modern Slavery questionnaire, and providing information on their environment, safety and sustainability practices.

The Supplier Management portal was tested in mid-2022 when Gold Road successfully acquired DGO Gold Ltd. DGO Gold's existing supplier list was brought across to the portal. The new suppliers were provided access to the portal with the majority filling in information gaps and completing the Modern Slavery self-assessment questionnaire (**SAQs**) in line with our supplier qualification standard.

Internal supplier compliance reporting enabled the Commercial team to focus and continue working with those suppliers that were ill-equipped to mitigate the risks associated with Human Rights and Modern Slavery. We have seen in nearly all cases that this collaboration has been valuable for the supplier improving their policies and processes to eliminate Human Rights and Modern Slavery risks in their business.

- Transition from quantitative data (e.g. number of workers trained) to qualitative data (e.g. increase in workers awareness post training) to report on effectiveness measures.

In 2022, workforce training on the new Supplier Management and Compliance module included reviewing Human Rights and Modern Slavery risks in the supply chain. The training provided our internal supplier managers with the knowledge and confidence to be able to discuss the Modern Slavery self-assessment questionnaire, which forms part of the Compliance module, with our suppliers transitioning to the new Supplier portal, thereby reducing the number of queries received and instances of supplier non-compliance.

- Continue to test our grievance mechanisms are trusted and accessible to stakeholders, ensuring they can receive and immediately escalate Modern Slavery complaints.
- Assess whether workers at our operations 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 from suppliers' workers. The assessment was not completed in 2022 and has been included in the actions for 2023.

03 Key Achievements

To identify areas for improvement and/or streamlining our processes, in 2022 we turned our focus onto an external review of what our peer group and other ASX200 companies were doing that is considered 'leading practice' and reasonable for a company of our size and scale. One subsequent initiative was to use our global intelligence vendor's research team to undertake comprehensive due diligence reviews of a selection of high risk suppliers.

Our internal procedure defines risk category thresholds including a minimum threshold. Our practice is to work with any supplier below the minimum threshold to improve their understanding of Human Rights and Modern Slavery, then improve their policies and procedures with the aim of eliminating Human Rights and Modern Slavery risks in their business.

We acknowledge that in not all instances will a supplier choose to accept Gold Road's assistance and/or change its practices, therefore in accordance with our internal procedure, we will source an alternate supplier who either meets or is willing to meet the supplier qualification standards.

In 2022, we experienced one such occurrence where the supplier declined to work with us to improve at-risk areas to meet the supplier qualification standards. At that point, and in accordance with our internal procedures, we stopped using the supplier and sourced an alternate supplier that did meet our standards.

Our supplier profile details are listed in the following table:

Tier 1 Supplier Profile		2022	2021	2020
No. of Suppliers		451	360	390
No. of Suppliers > \$100,000 p.a.		54	55	33
No. of Suppliers \$10,000 - \$100,000 p.a.		139	136	134
No. of Suppliers < \$10,000 p.a.		258	169	223
No. of Modern Slavery SAQ's Received				
No. of Modern Slavery SAQ's Received		202	138	16
Total Supplier Spend	A\$'M	46.4	41.2	31.8
Tax, Government Payments	A\$'M	4.8	5.1	5.0
Targeted Supplier Spend	A\$'M	41.6	36.1	26.8
Modern Slavery SAQ Spend	A\$'M	23.9	26.2	14.0
Percentage of Spend covered by SAQ's		57%	73%	52%

Source: Gold Road supplier register

The DGO acquisition in August 2022 has led to an increased supplier base and meant the percentage of Spend covered by Modern Slavery questionnaires regressed from 2021. In 2023 this will again significantly improve as this new element of our supplier base is targeted.

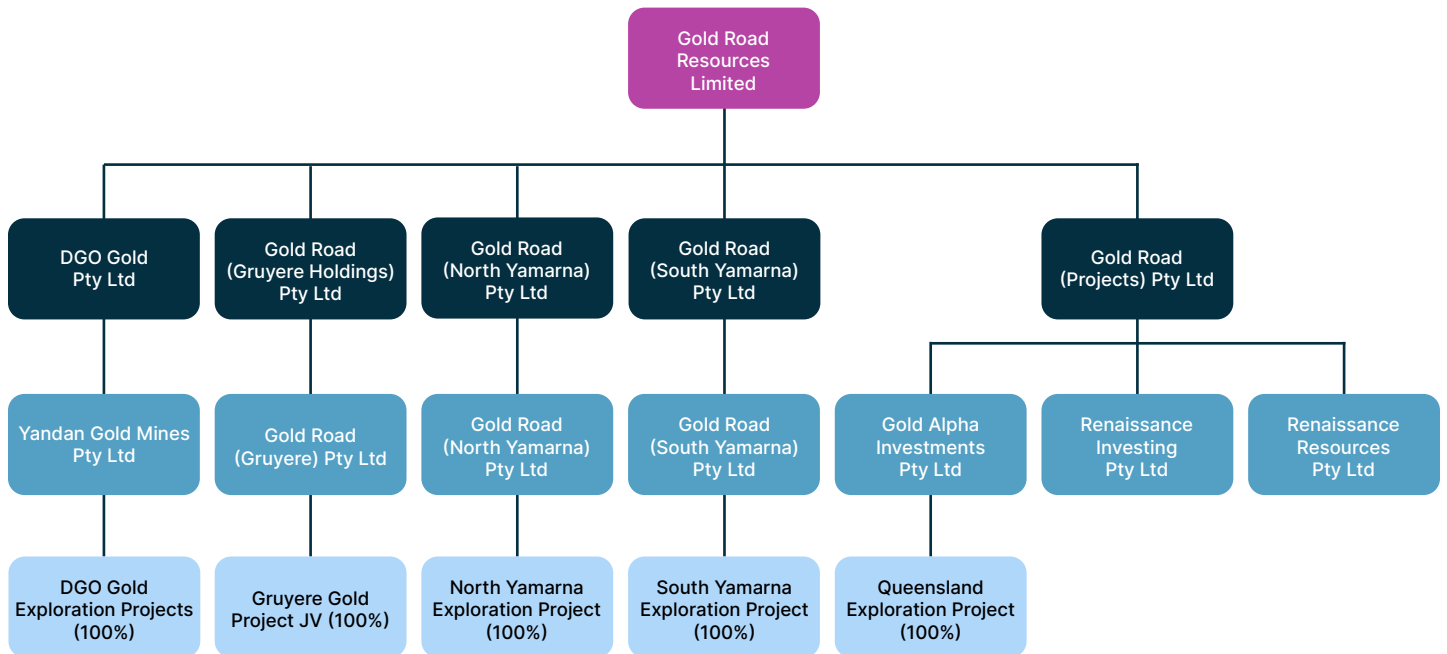
Gold Road will continue to apply increasing internal focus as the business grows on how supplier responses to Modern Slavery questionnaires and pre-qualification are assessed, ensuring ongoing training for staff and suppliers, audits, engagement with stakeholders (beyond industry), and development of an increasingly effective mechanism that will allow workers and society to identify and report issues.

04 About Us

4.1 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.

The Gold Road Group has five holding companies with twelve subsidiary entities (group subsidiaries) shown in the graphic below.



Gold Road's main operations include:

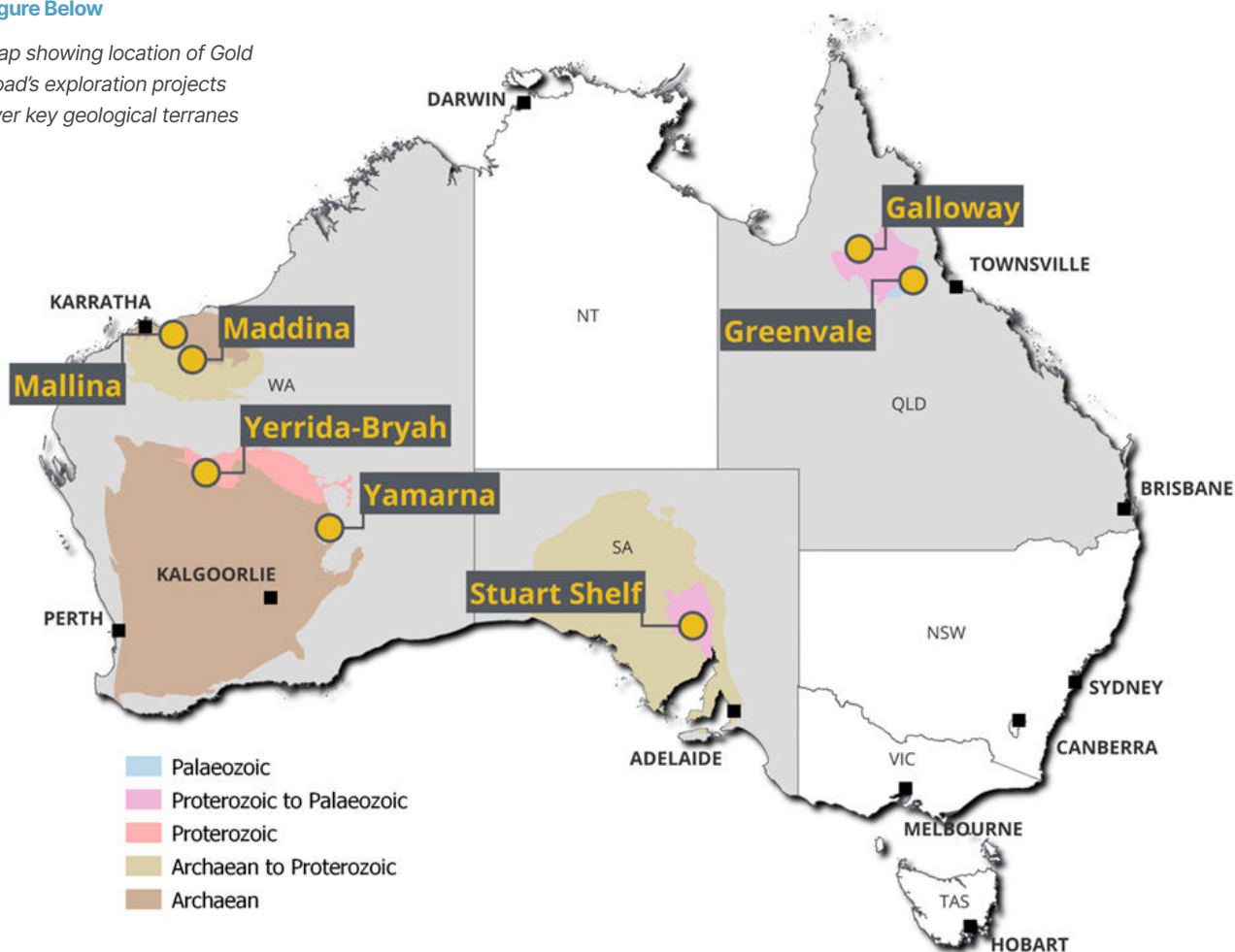
- Its 50% joint venture interest in the Gruyere Gold Mine in partnership with Gold Fields. The Gruyere Gold Mine is located in the north-eastern Goldfields in Western Australia and is managed and operated by a wholly owned subsidiary of Gold Fields, Gruyere Management Pty Ltd. All Gruyere employees and contractors are employed and contracted by the operator.
- Its wholly owned and managed exploration projects in Western Australia, South Australia and Queensland. All employees and contractors are employed and contracted by Gold Road.
- The DGO acquisition in August 2022 delivered Gold Road a strategic 14.4% shareholding in De Grey Mining Ltd, which has since increased to 19.73%.

Through the DGO Gold acquisition and 100%-owned exploration tenement applications, we now have more than 19,000 square kilometres of tenure in Australia, including projects in South Australia, far-north Queensland and in Western Australia.

04 About Us

Figure Below

Map showing location of Gold Road's exploration projects over key geological terranes



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.

At the end of 2022, Gold Road had 81 employees and an average contractor workforce of 55. 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. Our employees are not covered by enterprise bargaining agreements. There were no strikes or lockouts during the 2022 reporting period.

Gold Road's total 2022 cash outflow was \$324.0 million¹:

- \$16.5M (5%) was paid to Gold Road's employees
- \$45.9M (13%) related to payments to State and Federal governments, including mining royalties, payroll tax and other fees and expenditures
- \$265.1M (82%) related to payments to suppliers and contractors for goods and services, of which:
 - \$226.5M (85%) related to the Gruyere Gold Mine, managed and operated by Gold Fields
 - \$35.1M (15%) related to Gold Road's 100% owned and managed operations.

¹ The origin of the suppliers and contractor's 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 2022 Annual Report.

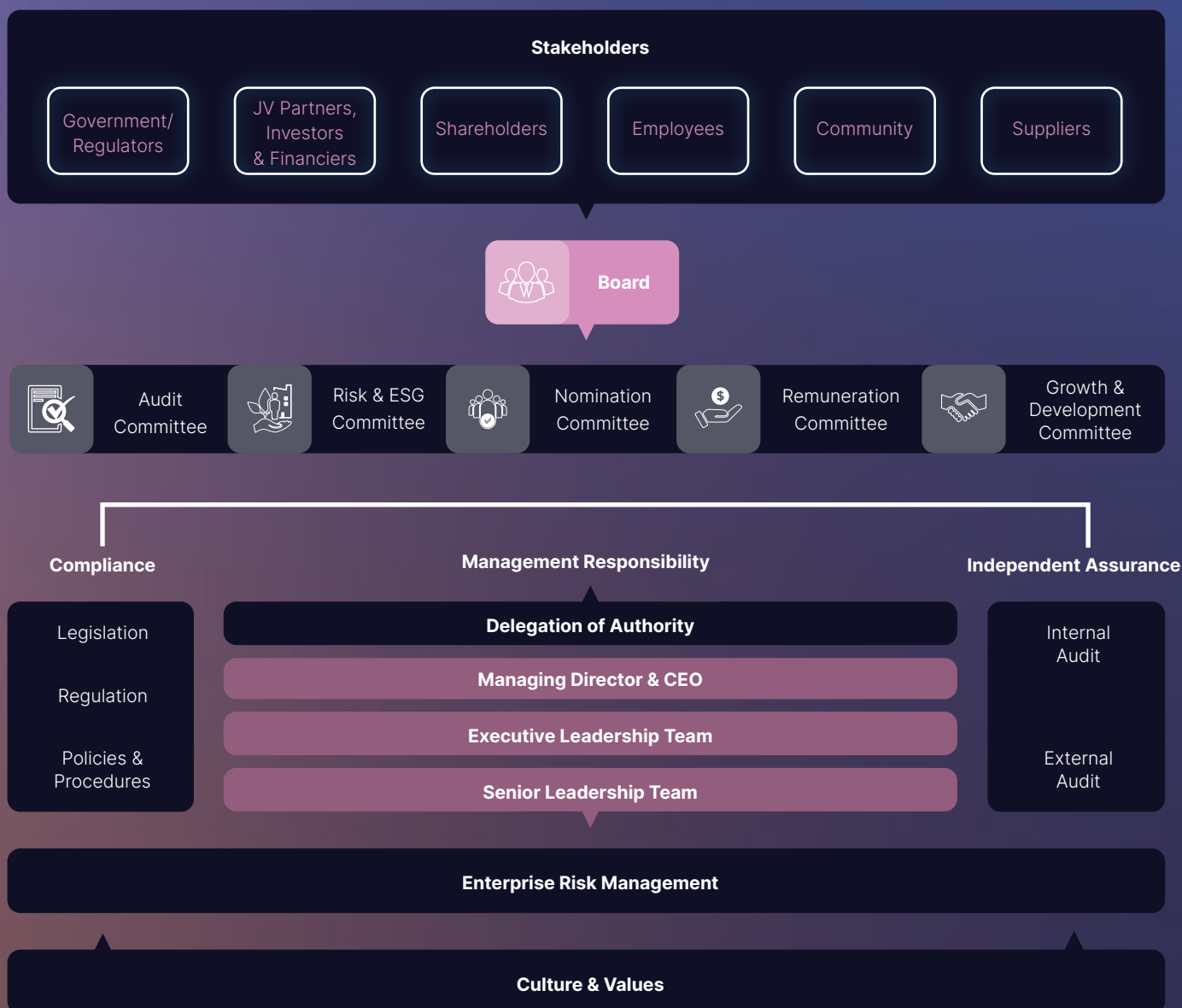
4.2 Governance Framework

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 2022 Corporate Governance Statement, available on our website goldroad.com.au.

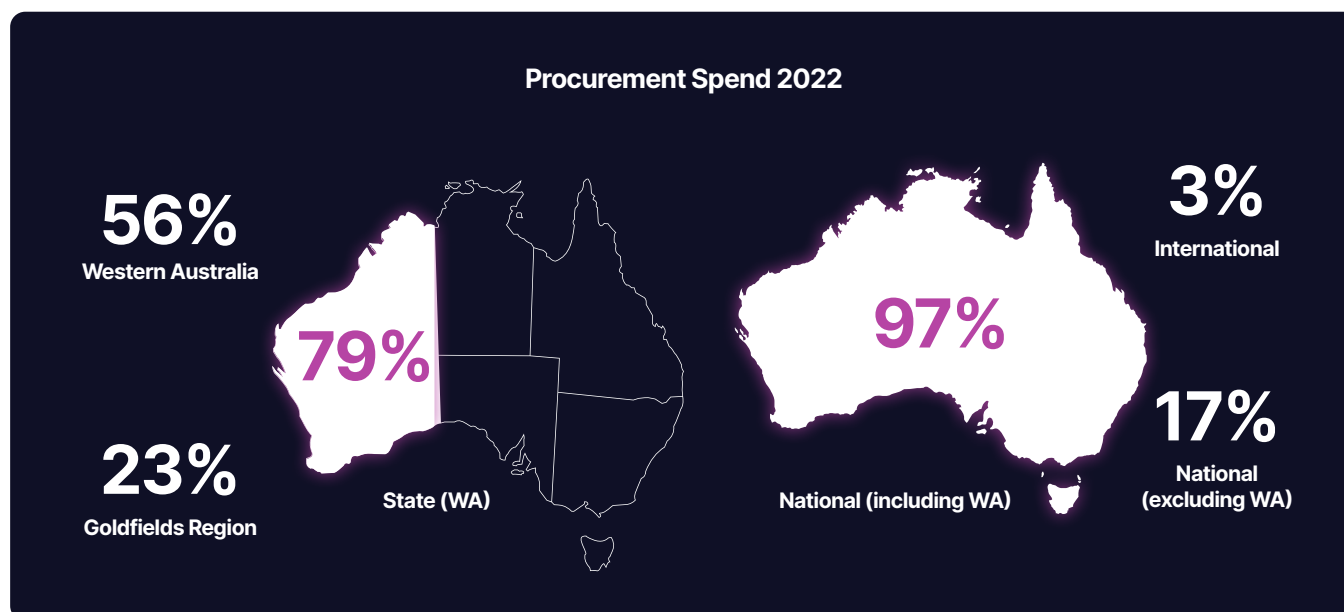
The Board is responsible for oversight of all sustainability issues with the Risk and ESG Committee accountable for ensuring the effective management of human rights related risks, including Modern Slavery.

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.

Corporate Governance Framework



04 About Us



	2022 (\$'000)	%	2021 (\$'000)	%
Local - Community (Goldfields Region)	8,083	23	5,089	14
Local - Western Australia	19,529	56	27,270	75
National	6,548	17	3,202	9
International	958	3	582	2

4.3 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 \$38.6 million in procurement expenditure in 2022, of which 97% was paid to suppliers located in Australia and 3% was paid to internationally located suppliers. Over 79% of our spend in 2022 was in Western Australia, including 23% to suppliers and service providers in the Goldfields region (which includes City of Kalgoorlie-Boulder and Shires of Laverton, Leonora and Menzies). Our direct procurement spend with aboriginal businesses for consulting, contracting and consumables accounted for ~1% of total procurement. [More information: 2022 Sustainability Report](#)



Gold Road's direct supply chain includes suppliers of products and services used in exploration activities across a wide range of categories, in 2022 these included:

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

Gold Road's supply chain includes professional and corporate office services and suppliers listed below:

- 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.

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 networks that potentially source goods and utilise labour from higher risk countries.

Many of our larger suppliers are aware of Human Rights and Modern Slavery risks and are pro-active in mitigating or eliminating the risks. We recognise that there are opportunities for us to learn and improve based on the experiences of our own suppliers, as well as assisting the Company to build capacity where that is required.

05 Modern Slavery Risks in our Operations and Supply Chain

Gold Road is not aware of any Modern Slavery in its operations and supply chains, however, Gold Road acknowledges 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 confident that its governance frameworks ensure that its employment practices eliminate the risk of Modern Slavery within its wholly owned and controlled operations. Our employees are all employed within Australia and are paid above the living wage threshold. 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: 2022 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	Gold Road has equity investments in Australian listed gold explorers. 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 in our non-managed joint ventures.

05 Modern Slavery Risks in our Operations and Supply Chain

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 location 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.



06 Our Ongoing Approach to Address Modern Slavery Risks in Our Business

6.1 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 own operations and supply chain
- Making our Whistleblower and Grievance reporting process available to 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.

6.2 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 supports the United Nations Universal Declaration on Human Rights and the Voluntary Principles on Security and Human Rights.

The Modern Slavery Framework is a mandatory online training compliance for the Board, Executive and Senior Leadership Teams, the Finance Team and all employees performing a role in Procurement.

Internal policy and training updates are disseminated to the general workforce via multiple mediums, such as email, pre-start meetings, monthly office briefings, and business partner quarterly meetings. 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.

Core Values



We work as one team



We innovate to improve



We care for the wellbeing of all



We act with integrity



We deliver

06 Our Ongoing Approach to Address Modern Slavery Risks in Our Business

6.3 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.

6.4 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.

6.5 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 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 supplier qualification standard and risk assessment process, prior to onboarding or contract award. This includes the requirement to complete a Modern Slavery questionnaire 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, supplier check through the structured intelligence software looking 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 Modern Slavery questionnaire is a valuable tool, Gold Road does not rely upon this 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; llo.org; oric.gov.au; asic.gov.au), which are designed to moderate supplier human rights self-assessment scores and provide a more holistic assessment. We have partnered with a global vendor to use their structured intelligence software to do checks on heightened risk individuals and organisations. **More information: Key Achievements section**

The checks cover the following key risk areas:

- Modern Slavery risk
- Integrity risk
- Environment, social and governance risks
- Operational and quality risks
- Identity risk

Gold Road welcomes feedback or concerns from its stakeholders and has established an independent, confidential and anonymous reporting application 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 reporting application is in our Whistleblower Policy available on our website goldroad.com.au.

06 Our Ongoing Approach to Address Modern Slavery Risks in Our Business



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.

We are committed to remediation where we identify that we have caused or contributed to Modern Slavery. Our approach is to work 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. 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 2022.

07 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, 87% of procurement is from in-country suppliers, and 12% was sourced from host community suppliers². Gold Fields determine the risk of Modern Slavery in their first tier Australian suppliers is low, failing to find anything untoward in this reporting period.

2. Source: Gruyere supplier register – Gold Fields defines host community as Australian registered business with a physical presence in the Eastern Goldfields region of Western Australia.

07 Gruyere Gold Mine

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 2022, the Gruyere Gold Mine had a total workforce of 537 personnel, comprising 193 Gruyere employees and 344 contractors. Gruyere's procurement spend, in 2022, was ~\$403 million, of which 87% was in Australia and 12% was with host community suppliers.

In 2022, Gruyere's top 10 supply chain categories by spend are listed in the following table.

		\$'M	%
1	Mining Goods and Services	\$143.53	32.79
2	Utilities	\$72.61	16.08
3	Fixed Plant & Equipment	\$65.59	14.53
4	Grinding Media	\$33.37	7.39
5	Chemicals	\$25.65	5.68
6	Professional Services	\$18.56	4.11
7	Infrastructure and Site Services	\$14.96	3.31
8	Mobile Equipment	\$14.19	3.14
9	General Equipment Hire	\$8.74	1.94
10	Indirect Goods & Services	\$7.57	1.68
	Other	\$46.74	10.35

08 How We Assess the Effectiveness

As we continue to improve our processes, we will review the effectiveness of our approach to Modern Slavery risk management by:

- Assessing our governance, 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 Board Committee on sustainability and Human Rights.

09 Looking Forward

Gold Road's key priorities for 2023 will include the following:

- Completing pre-qualification of all Suppliers in our Supplier Management and Compliance portal including allocation of risk classifications and capture of all required information
- For suboptimal Modern Slavery questionnaire scores continue collaboration with the supplier to build awareness of Human Rights and a Modern Slavery framework
- Continue the desktop due diligence programme on selected high risk suppliers in the Gold Road supply chain
- Continue development of the Supplier Management and Compliance module including development of system capability for further automation of reporting and conversion of data into information analytics and useful dashboards
- Preparation of Supplier Management and Compliance guidance once all system automation is complete for use by Gold Road and its business partners
- Continue internal and external training focused on enhancing Human Rights and Modern Slavery knowledge and social responsibility.

10 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 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 12 June 2022.

Duncan Gibbs
Managing Director & CEO

2022 MODERN SLAVERY STATEMENT