

MODERN SLAVERY STATEMENT

2023



**GOLD
ROAD**
RESOURCES

Acknowledgement of Country

We acknowledge the Traditional Owners and local communities of the lands on which Gold Road operates. We acknowledge the unique and continuing connection of those peoples to those lands and the custodial responsibilities of those peoples to ensure the wellbeing of the land, its inhabitants and their culture and traditions. Consistent with our values, we are committed to caring for the wellbeing of all, acting with integrity, respecting human rights, and developing sustainable exploration and mining operations. Gold Road seeks to create positive social impacts by promoting respect for human rights across all our operations.

ABOUT THIS MODERN SLAVERY STATEMENT

This is Gold Road Resources Limited's (**Gold Road** or the **Company**) Modern Slavery Statement for the calendar year ended 31 December 2023. This Statement has been prepared in compliance with the Modern Slavery Act 2018 (Cth) (**Modern Slavery Act**).

Gold Road Resources Limited (Gold Road or the Company), is listed on the Australian Securities Exchange (ASX: GOR) and is headquartered in Perth, Western Australia.

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.

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.

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 subsidiaries on 26 June 2024.

Front Cover Image

Mallina Project landscape,
Pilbara region Western Australia

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01

Managing Director's Message

I am pleased to present our fourth Modern Slavery Statement covering the 2023 calendar year.

Gold Road is committed to protecting vulnerable people and groups through our governance framework, policies and practices. We support the UN Guiding Principles on Human Rights (Protect, Respect and Remedy) and apply the UN Guiding Principles framework to help us understand the nature of risks we may potentially face.

In 2023, we found no modern slavery cases in either Gold Road's 100% owned operations or our supply chain and there were no human rights or modern slavery reports made to our Whistleblower hotline. Although our approach to modern slavery risk management continues to evolve in line with best practices and the growth of our business, we believe Gold Road faces very low modern slavery risks in our operations and supply chains.

A major focus in 2023 was continuing to requalify existing suppliers through our advanced due diligence system, reaching 92% of suppliers by year's end. We conducted 'deep dives' on three of these suppliers as contracts were renewed in 2023.

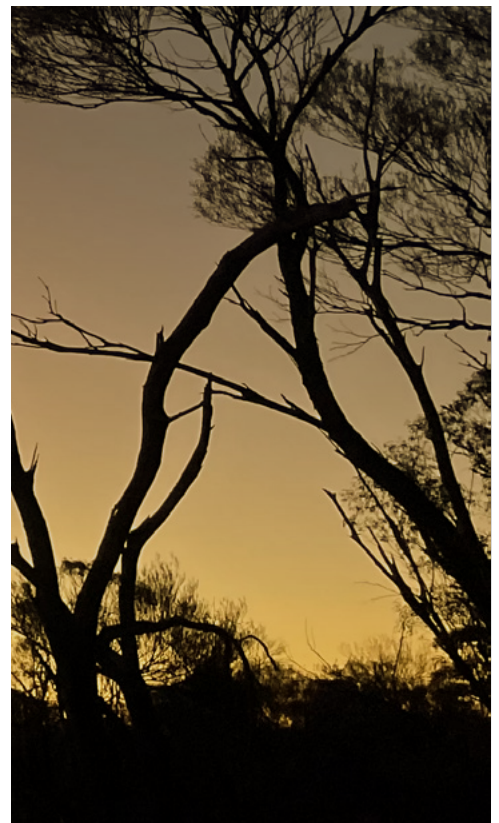
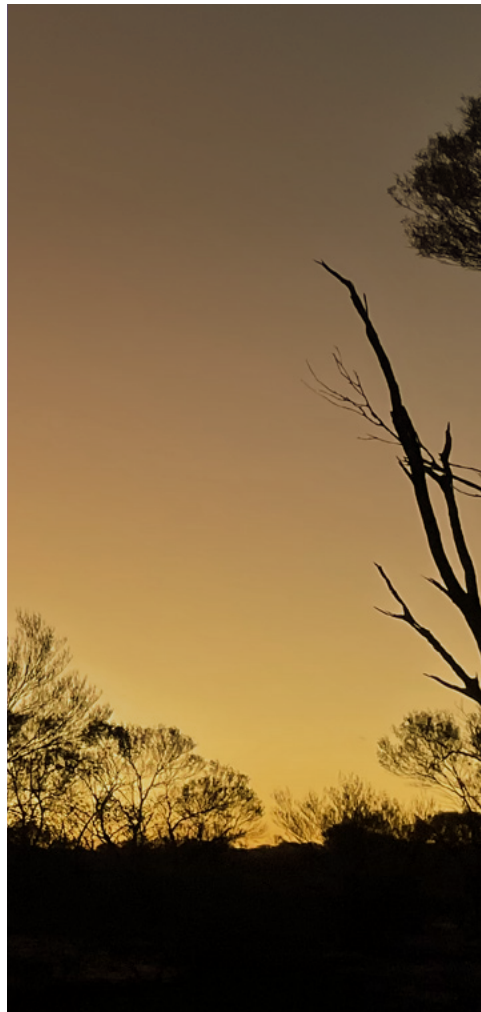
In addition, our people completed 246 hours training (2022: 105 hours) on how to identify and avoid human rights and modern slavery risks in our operations or supply chain.

We completed our annual supplier risk assessment using third-party intelligence risk software that monitors public information about modern slavery incidences. We avoid investing where there is a heightened risk of modern slavery.

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



02

About Us

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 includes the parent company Gold Road Resources Ltd and 16 subsidiary entities as shown in the graphic below.





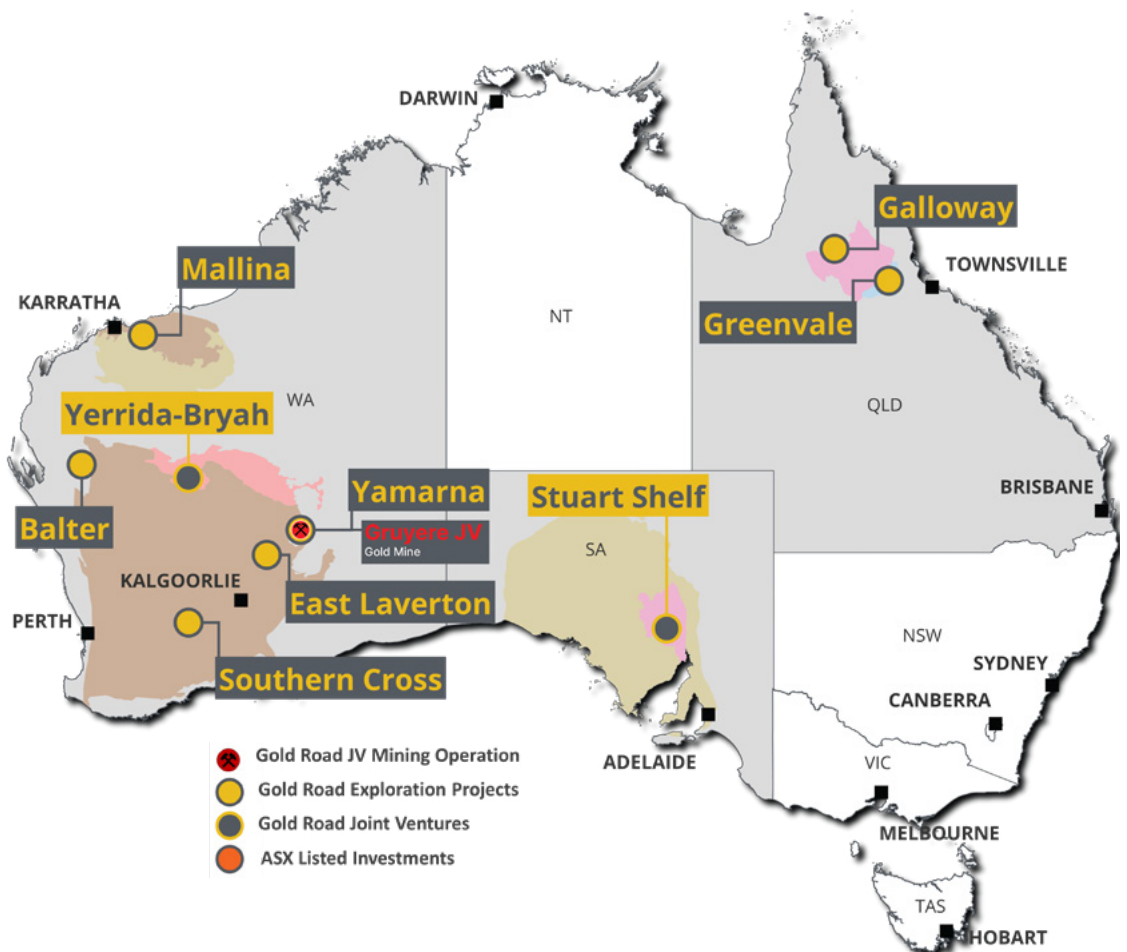
Gold Road’s main operations include:

- Its 50% joint venture interest in the Gruyere Gold Mine in partnership with Gold Fields. The Gruyere Gold Mine is located in the northeastern 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 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 17.85%¹.

- Gold Road now manages more than 17,450 square kilometres of exploration tenure across Western Australia and Queensland and holds free-carried non-managed JV interests in a further 7,610 square kilometres of exploration tenure in Western Australia and South Australia.

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 2023, Gold Road had 95 employees.



¹ Investment valuation at 21 May 2024 and following participation in the De Grey Entitlement Offer as announced to the ASX on 10 May 2024

Governance Framework

Our approach to corporate governance is outlined in the 2023 Corporate Governance Statement, available on our website [goldroad.com.au](https://www.goldroad.com.au).

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

Modern slavery and human rights risks are reviewed monthly by the Executive Leadership Team and quarterly by the Board's Risk and ESG Committee, which is then reported to the full Board.

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Our Approach to Modern Slavery Risks

Our major strategy for reducing modern slavery risks as low as practically possible is to buy locally as much as possible. Approximately 98% of our procurement spend was in Australia, with 97% of spend focused in our local regions (2022: 23%) (see image page 10). This is consistent with our broader socio-economic development strategy which aims to create economic opportunities in the communities where we operate through local employment, and by engaging with our local communities to procure products and services for our Company.

We see our approach to human rights as intimately linked with our approach to cultural heritage protection, workers' rights, protection of women's rights and communities.

We support this approach with these actions:

- Conducting annual due diligence on all suppliers, including 'deep dives' on select suppliers
- Training our people and contractors to identify, report and avoid modern slavery risks
- Ensuring close supervision by the Executive Leadership through monthly reviews and the Board's Risk and ESG Committee (quarterly reviews)
- Avoiding investments in jurisdictions with higher modern slavery risks
- 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
- Paying all our employees above 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 Corporate Code of Conduct, Supplier Code of Conduct and other related policies in relation to their own operations and supply chains
- 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.

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

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 framework that explains how businesses may be involved in human rights abuses by directly causing, contributing to, or being directly linked through business relationships.

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 risks.

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"

Gold Road has a well communicated Whistleblower and Grievance reporting process. 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.

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.



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.

Policies and Procedures

Our commitment to human rights is enshrined in our Human Rights Policy, People Policy, Corporate Code of Conduct, Supplier Code of Conduct and our Diversity and Inclusion Standard which are publicly available on our website goldroad.com.au.

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 UN 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.

Corporate Code of Conduct

Gold Road’s Corporate 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.

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.



OUR SUPPLY CHAIN



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.

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). Greater scrutiny is applied to suppliers in higher risk sectors and products.

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 self-assessment questionnaire and provide verification.

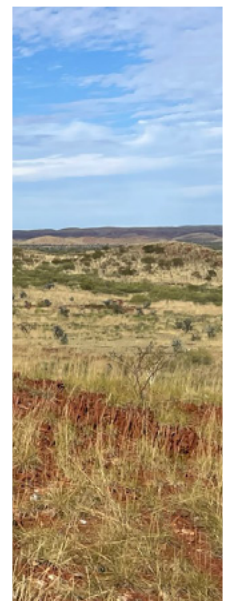
Whilst the modern slavery self-assessment questionnaire (SAQ) is a valuable tool, Gold Road does not rely upon this as the sole measure of a supplier's modern slavery compliance risk. Gold Road's Modern Slavery Risk Framework incorporates data from other reference sources (e.g. [globalslaveryindex.org](https://www.globalsslaveryindex.org); 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. We have partnered with a global vendor to use their structured intelligence software to conduct checks on heightened risk individuals and organisations.

The checks cover the following key risk areas:

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

Image Right

Gold Road Board site visit to the Mallina Project, Pilbara region Western Australia



Whistleblower Policy

Gold Road welcomes feedback or concerns from its stakeholders. We have 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.

In accordance with our Whistleblower policy (available at www.goldroad.com.au) 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.

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 Workplace Behaviour 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.

GOLD ROAD GOLDEN COMMITMENTS

Speak up

Develop & Follow Procedures

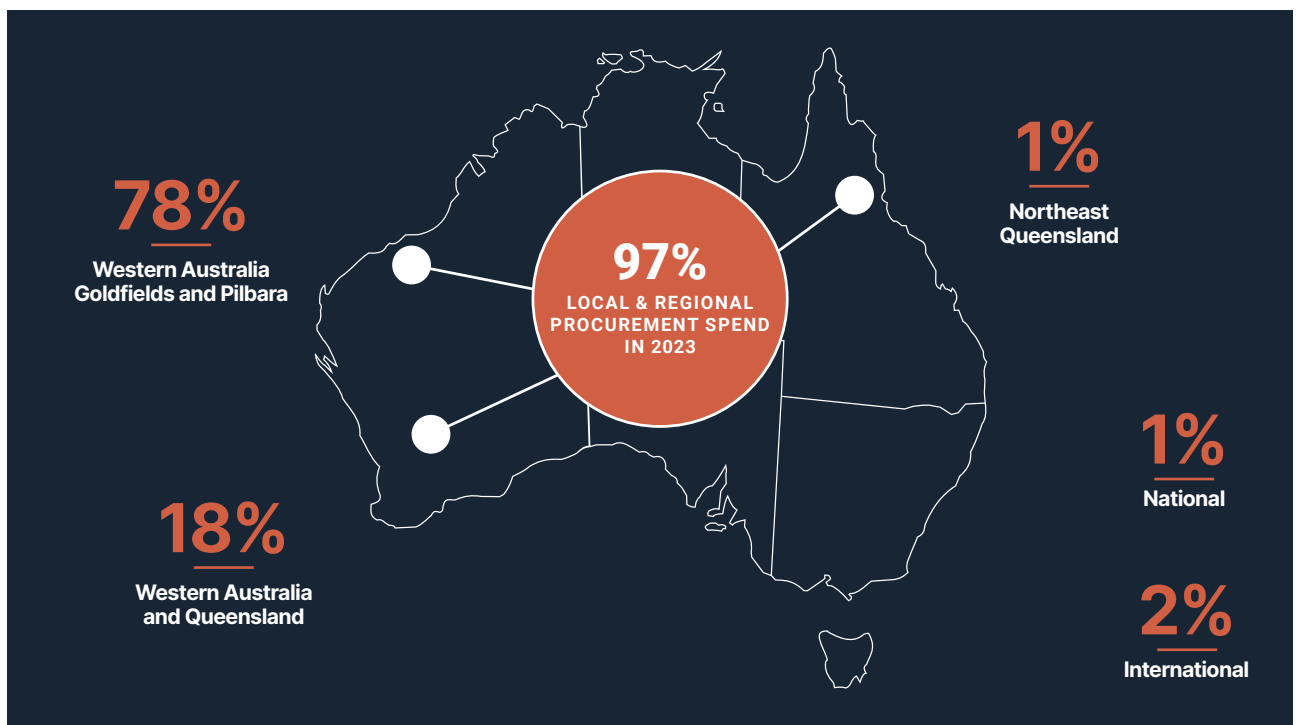
Be Inclusive

Plan, Schedule & Communicate

04 | Key Activities in 2023

In 2023, we had 428 active suppliers, with no suspected or confirmed incidents of modern slavery in our supply chain or operations. Around 5% of our spend (~\$1.8 million) went to Aboriginal corporations and businesses.

Our local procurement approach helps protect us from modern slavery risks. Approximately 79% of our procurement spend was in our local regions (2022: 23%). More information: [2023 Sustainability Report](#).



In 2023, we raised supplier re-qualifications through our updated online supplier portal across several areas including modern slavery, from 50% in 2022 to 92% in 2023.

Gold Road’s partnerships with key contractors such as drilling contractors are well established and we maintain a strong focus on contractor performance. Contract partners are required to undertake risk assessments for all their activities on Gold Road projects prior to starting work including modern slavery and human rights risks.

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 these 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.

None of our operations or workplaces are deemed to be at risk for incidents of child labour or forced labour.

A small proportion of our procurement (2%) is from international suppliers. Our international purchases in 2023 comprised items such as software, consultant services, and industry conference fees. Our biggest offshore purchases were software applications from Ireland and the USA. The Netherlands and Canada were the other countries we purchased from. We had no purchases from any countries estimated to have the highest prevalence of modern slavery².

Our employees completed a total of 246 hours in human rights and modern slavery training in 2023 (2022: 105).

We are not currently able to monitor environmental or human rights impacts in our supply chain, beyond scanning public information. Most of our suppliers are in Australia, so our focus to date has been on our direct suppliers, whom we assess as having low human rights risks.

We are not aware of any suppliers in which the right to freedom of association and collective bargaining may be at risk, nor are we aware of any suppliers at risk for incidents of child labour, forced or compulsory labour. Gold Road does not employ security personnel in any of our project areas or offices.

To support streamlining the supplier pre-qualification process, Gold Road uses a third-party supplier to scan suppliers' public information and publicly available non-compliances when reviewing business-critical suppliers.

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 deepening our understanding of our supply chain, and providing insights into actions suppliers have taken to address or mitigate poor human rights practices.

We review suppliers' Modern Slavery Statements where they are available. To assess suppliers who don't publish 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 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. We did not identify any high-risk issues.

In addition to the risk assessments and 'deep-dives' we set internal initiatives to continually improve the quality of information gathered from our suppliers. Additionally, utilising the newly implemented Human Capital Management Application's (**HCMA**) onboarding and training modules to evaluate and assess the effectiveness of our human rights, whistleblower and training by testing awareness post training.

Gold Road will continue to apply increasing internal focus as the business grows on how supplier responses to modern slavery questionnaires and pre-qualifications 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.

While our due diligence and engagement with our suppliers is showing the modern Slavery risk relating to Gold Road’s Tier 1³ 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. Our supplier profile and spend information details are listed in the following table.

Tier 1 Supplier Profile		2023	2022
No. of Active Suppliers		428	451
No. of Modern Slavery SAQ’s Received ⁴		128	202
Targeted Supplier Spend*	\$M	32.7	41.6
Modern Slavery SAQ Spend**	\$M	24.7	23.9
Percentage of Spend covered by SAQ’s		76%	57%

2023 Supplier Spend	\$’000
Local region – Western Australia (Goldfields and Pilbara)	\$25,498
Local other – Western Australia and Queensland (excluding regional spend)	\$5,915
Local region – Northeast Queensland	\$437
National – (other than Western Australia and Queensland)	\$285
International	\$552

*Targeted Supplier Spend is post tax, government payments that are not discretionary

**Modern Slavery SAQ spend represents all supplier spend where the supplier has completed a Modern Slavery SAQ

Source: Gold Road supplier register

05

Modern Slavery Risks in our Operations and Supply Chain

Image Right

Gruyere solar farm

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 even though we have not so far found any. In this section we summarise our understanding of the modern slavery risks we potentially face and describe the mitigations we have put in place to date.



³ Tier 1 suppliers are suppliers that directly supply goods, materials or services to Gold Road

⁴ SAQ means the Modern Slavery Self-Assessment Questionnaire

Type of Risk	Description	Mitigation	2023 Actions
Our Operations			
	<p>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.</p> <p>We recognise that modern slavery risks can potentially be introduced into our business through our employment and governance practices.</p>	<p>Our governance framework and employment practices reduce the risk of modern slavery within our wholly owned and controlled operations as low as practically possible.</p> <p>All our employees are in Australia and are paid above the living wage threshold.</p> <p>Gold Road is vigilant in ensuring modern slavery risks are regularly assessed against the UN Guiding Principles of Cause, Contribute and Directly Linked, concurrently ensuring we are proactive in relevant workforce training and education.</p>	<p>Modern slavery risks were addressed at monthly meetings by the Executive Leadership Team and quarterly by the Board's Risk and ESG Committee with results reported to the full Board.</p> <p>We remained in compliance with all Australian employment legislation and we benchmark employment conditions annually with an external provider.</p> <p>Training on modern slavery risks was provided to employees with additional training required for senior leaders and the procurement team.</p> <p>More information: 2023 Sustainability Report</p>
Our Supply Chains			
	<p>We recognise the risk of modern slavery in our supply chains, especially where we do not have a direct contractual relationship with a Tier 2⁵ (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>	<p>We prioritise local procurement because it supports local socio-economic development. This also helps minimise modern slavery risks as Australia is a low-risk jurisdiction.</p> <p>A modern slavery risk assessment is performed for all suppliers. This may entail a desktop review of public information about a supplier, a review of the supplier's own Modern Slavery Statement (where available), or a deeper analysis and engagement where required to help a supplier meet our standard.</p>	<p>After introducing new enterprise management software that includes heightened modern slavery risk assessment requirements (the Supplier and Procurement application) in 2022, we continued to re-qualify suppliers, reaching 92% of 428 active suppliers by the end of 2023.</p> <p>Deep dives were performed on three suppliers' as contracts were renewed in 2023.</p>
Non-operated Joint Ventures			
	<p>Gold Road's primary asset is its non-managed interest in the Cruyere 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>We engage with our JV partner 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>	<p>Monthly JV management meetings addressed all aspects of the mine's activities including human rights and modern slavery risks.</p> <p>Gold Road's Supplier Self-Assessment Questionnaire is aligned with Gold Fields pro-forma to help align our approach and reduce compliance burdens for shared suppliers.</p>

⁵ Tier 2 Suppliers and their Suppliers are suppliers who provide their products and services to a Tier 1 supplier.

Type of Risk	Description	Mitigation	2023 Actions
Equity Investments			
	<p>Gold Road has 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 in our non-managed joint ventures.</p>	<p>We review modern slavery risks of equity investments before they are committed, then annually against Gold Road's business profile and growth strategy.</p>	<p>New equity investments made in 2023 are described in the 2023 Annual Report. As these investments are in the WA Goldfields region close to our existing activities, the potential modern slavery risks are well understood and similar to those we face in our own operations and supply chains.</p>
Sector (Industry)			
	<p>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).</p>	<p>The mining sector is known to carry higher human rights risks though that is reduced in Australia due to our strong rule of law. As an explorer and investor, we consider these risks through our JV relationships and equity investments.</p>	<p>In 2023 we continued to monitor these risks. We had no suspected or confirmed incidences of modern slavery.</p>
Product/Services			
	<p>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).</p>	<p>We have identified certain categories of purchases as potentially higher risk, such as personal protective equipment, freight and cleaning services.</p>	<p>In 2023 we continued to procure local cleaning services and freight. PPE purchases underwent increased due diligence due to the known risks in these supply chains.</p>
Geographic Risks			
	<p>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.</p>	<p>Gold Road operates entirely within Australia which is a low-risk jurisdiction for modern slavery.</p>	<p>In 2023 we remained in compliance with all relevant legislation.</p>

06

Effectiveness



Image Right

Aircore sample sieving

As we continue to improve our processes, we 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
- 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 (a third-party provider reviewed our modern slavery reporting in 2023)
- Quarterly reporting to the Risk and ESG Board Committee on sustainability and human rights.

07

Looking Forward

Gold Road's key priorities for 2024 will include:

- Completing pre-qualification of all Suppliers in our Supplier Management and Compliance portal including allocation of risk classifications, which at the end of the reporting period was 92%
- 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 program on selected high-risk suppliers in the Gold Road supply chain
- Continue development of the Supplier Management and Compliance module to improve data accuracy and analytical capabilities
- Continue internal and external training focused on enhancing human rights and modern slavery knowledge and social responsibility.

08

Collaboration and Consultation

The boards of directors of the reporting entities included in this Statement comprise a small number of common officeholders who are Gold Road Directors or members of the Executive Leadership Team. Therefore, consultation with the individual reporting entities was not required to prepare this Statement. 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 and participated in either the development or review of this Statement.

Gold Road also 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.

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.

09

Gruyere Gold Mine

The Gruyere Gold Mine is operated and managed by our JV 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 12% was sourced from host community suppliers⁶. Gold Fields determine the risk of modern slavery in their first-tier Australian suppliers is low, not finding anything untoward in this reporting period.

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 2023, the Gruyere Gold Mine had a total workforce of 679 personnel, comprising 188 Gruyere employees and 491 contractors. Gruyere's procurement spend in 2023 was \$464 million, of which 99% was in Australia and 12% was with host community suppliers.

Image Right

Gruyere open pit



⁶ 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.



AUSTRALIAN MID-TIER
GOLD PRODUCER