

1. Introduction

- 1.1 Modern slavery is a growing and complex problem that requires collaboration of business to eradicate. The Board is committed to limiting the risk of modern slavery within its own business.
- 1.2 Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and deprive them of their freedom. This might include matters such as trafficking in persons or organs, slavery, force labour, forced marriage, debt bondage, deceptive recruiting for labour or hire services, and the worst forms of child labour (eg hazardous work) (“**Modern Slavery**”).
- 1.3 The Modern Slavery Act 2018 (Cth) (“**Act**”) requires Mount Gibson (“**Company**”) to publish a Modern Slavery Statement by 31 December each year confirming what actions it is taking to address Modern Slavery risks in its operations and supply chains. The Modern Slavery Statement will be published on the Government’s online register of Modern Slavery Statements.
- 1.4 The purpose of the Policy is to ensure that the Company is taking positive steps to remove any risks of Modern Slavery from its business and supply chains, taking relevant remedial actions where practicable, and is meeting its obligations under the Act

2 Application of this Policy

- 2.1 This Policy applies to all directors, all employees, suppliers, contractors, employees of contractors, tenderers or any other person who has business dealings with Mount Gibson.
- 2.2 The Company expects that all who have, or seek, a relationship with Mount Gibson to familiarise themselves with this Policy and to act in a way that is consistent with its values.
- 2.3 This Policy should also be read in conjunction with the Company’s Employee Code of Conduct and Anti-Bribery and Corruption Policy.

2. The Company’s response to Modern Slavery

- 2.1 The Company does not condone the use of Modern Slavery practices in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.
- 2.2 The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, involuntary servitude, failure to provide safe working conditions, or meet minimum wage obligations.
- 2.3 Where the Company is made aware of Modern Slavery practices in its own business or within its supply chain, the Company will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy.

- 2.4 The Company is committed to and has commenced:
- (a) undertaking risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas;
 - (b) educating its workforce and communicating with suppliers in respect of Modern Slavery matters;
 - (c) taking remedial actions within the business and in conjunction with suppliers if incidents of Modern Slavery are identified;
 - (d) developing due diligence practices for pre-qualifying suppliers based on their commitment to eradicating Modern Slavery in their own supply lines; and
 - (e) wherever possible introducing anti-slavery obligations in all key supplier contracts seeking confirmation as to the supplier's ongoing commitment to eradicating modern slavery within its own business and those of its own suppliers.

3. Non-Compliance with this Policy

- 3.1 Any breach of this Policy will be taken seriously and dealt with on a case by case basis.
- 3.2 A breach of this Policy by an employee may lead to disciplinary action being taken in accordance with the Company's disciplinary process. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to the Company's disciplinary procedure.
- 3.3 A breach of this Policy by a supplier will also be dealt with on a case by case basis. Depending on the behaviour, the Company may choose to adopt a zero-tolerance stance towards the Supplier's behaviour and look at methods of preventing further engagement with the Supplier, or may decide to work with the Supplier so they become compliant with this Policy.

4. Reports

- 4.1 The Company encourages the reporting of any instances of suspected Modern Slavery involving the Company's businesses and supply chains provides protections and measures through its Whistle Blower Policy so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.
- 4.2 Any reported incidents or suspected incidents of Modern Slavery will, subject to the protections afforded under the Whistle Blower Policy, be provided to:
- (a) the Managing Director or Chief Executive Officer (as applicable); and
 - (b) to the Board Chairman and the Audit and Financial Risk Committee half-yearly.

5. Questions

- 5.1 Employees or suppliers who have any questions about this Policy should seek clarification from their supervisor, Company representative, or the Company Secretary.

6. Review

- 6.1 The Operational, Risk & Sustainability Committee is to review this Policy annually and make recommendations to the Board on whether changes are required to be made. The Board must consider any recommendation received from the Operational, Risk & Sustainability Committee and, where appropriate, amend this Policy.
- 6.2 A copy of the Policy will be made available on the Company's website and intranet.