



2021 - 22 Compliance Program

Submitted by:

Mount Gibson Iron Limited (ABN:87008670817)

Koolan Iron Ore Pty Ltd (ABN:87099455277)

Mount Gibson Mining Limited (ABN:32074575885)

Geraldton Bulk Handling Pty Ltd (ABN:45100105388)

Date: 2022-05-31

#Workplace overview

Policies and strategies

1: Do you have a formal policy and/or formal strategy in place that specifically supports gender equality in the following areas?

| cqu | equality in the following areas: | | | |
|-----|---|----------------------------|--|--|
| | Recruitment | Yes(Select all that apply) | | |
| | .Yes | Policy | | |
| | Retention | Yes(Select all that apply) | | |
| | .Yes | Policy | | |
| | Performance management processes | Yes(Select all that apply) | | |
| | .Yes | Policy | | |
| | Promotions | Yes(Select all that apply) | | |
| | .Yes | Strategy | | |
| | Talent identification/identification of high potentials | Yes(Select all that apply) | | |
| | .Yes | Strategy | | |
| | Succession planning | Yes(Select all that apply) | | |
| | .Yes | Strategy | | |
| | Training and development | Yes(Select all that apply) | | |
| | .Yes | Policy | | |
| | Key performance indicators for managers relating to gender equality | Yes(Select all that apply) | | |
| | .Yes | Strategy | | |
| | | | | |

2: Do you have formal policy and/or formal strategy in place that support gender equality overall? Yes(Select all that apply)

...Yes Strategy

- 3: Does your organisation have any of the following targets to address gender equality in your workplace?
- 4: If your organisation would like to provide additional information relating to your gender equality policies and strategies, please do so below.

Governing bodies

Mount Gibson Iron Limited

| 1: Does this organisation have a governing body? | Yes(Provide further details on the governing body(ies) and its composition) |
|---|---|
| 1.1: What is the name of your governing body? | Board of directors |
| 1.2: What type of governing body does this organisation have? | Board of directors |

| 1.3: How many members are on the governing body and who holds the predominant Chair | |
|---|---|
| position? | |
| Chairs | |
| Female | 0 |
| Male | 1 |
| Non-binary | 0 |
| Members | |
| Female | 0 |
| Male | 5 |
| Non-binary | 0 |
| 1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members? | No(Select all that apply) |
| | Not aware of the need |
| 1.5: Has a target been set to increase the representation of women on this governing body? | Yes(Provide further details on your target) |
| 10.6: What is the percentage (%) target? | 17.00% |
| 10.7: What year is the target to be reached (select the last day of the target year)? | 30-Apr-2023 |
| 1.6: Do you have a formal policy and/or formal strategy in place on the gender composition of your governing body? | No |
| | Not aware of the need |
| 1.1.a.3: How many members are on the governing body and who holds the predominant Chair position? | |
| Koolan Iron Ore Pty Ltd | |
| 1: Does this organisation have a governing body? | Yes(Provide further details on the governing body(ies) and its composition) |
| 1.1: What is the name of your governing body? | Mount Gibson Iron Limited |
| 1.2: What type of governing body does this organisation have? | Board of directors |
| 1.3: How many members are on the governing body and who holds the predominant Chair position? | |
| Chairs | |
| Female | |
| Male | 1 |
| Non-binary | 0 |
| Members | |
| | |

| Female | 0 |
|---|---|
| Male | 5 |
| Non-binary | 0 |
| 1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members? | No(Select all that apply) |
| | Not aware of the need |
| 1.5: Has a target been set to increase the representation of women on this governing body? | Yes(Provide further details on your target) |
| 10.6: What is the percentage (%) target? | 17.00% |
| 10.7: What year is the target to be reached (select the last day of the target year)? | 30-Apr-2023 |
| 1.6: Do you have a formal policy and/or formal strategy in place on the gender composition of your governing body? | No |
| | Not aware of the need |
| 1.1.a.3: How many members are on the governing body and who holds the predominant Chair position? | |
| Mount Gibson Mining Limited | |
| 1: Does this organisation have a governing body? | Yes(Provide further details on the governing body(ies) and its composition) |
| 1.1: What is the name of your governing body? | Mount Gibson Iron Limited |
| 1.2: What type of governing body does this organisation have? | Board of directors |
| 1.3: How many members are on the governing body and who holds the predominant Chair position? | |
| Chairs | |
| Female | |
| Male | 1 |
| Non-binary | 0 |
| Members | |
| Female | 0 |
| Male | 5 |
| Non-binary | 0 |
| 1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members? | No(Select all that apply) |
| | Not aware of the need |
| 1.5: Has a target been set to increase the representation of women on this governing | Yes(Provide further details on your target) |
| | |

| body? | |
|---|---|
| 10.6: What is the percentage (%) target? | 17.00% |
| 10.7: What year is the target to be reached (select the last day of the target year)? | 30-Apr-2023 |
| 1.6: Do you have a formal policy and/or formal strategy in place on the gender composition of your governing body? | No |
| | Not aware of the need |
| 1.1.a.3: How many members are on the governing body and who holds the predominant Chair position? | |
| Geraldton Bulk Handling Pty Ltd | |
| 1: Does this organisation have a governing body? | Yes(Provide further details on the governing body(ies) and its composition) |
| 1.1: What is the name of your governing body? | Mount Gibson Iron Limited |
| 1.2: What type of governing body does this organisation have? | Board of directors |
| 1.3: How many members are on the governing body and who holds the predominant Chair position? | |
| Chairs | |
| Female | |
| Male | 1 |
| Non-binary | 0 |
| Members | |
| Female | 0 |
| Male | 5 |
| Non-binary | 0 |
| 1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members? | No(Select all that apply) |
| | Not aware of the need |
| 1.5: Has a target been set to increase the representation of women on this governing body? | Yes(Provide further details on your target) |
| 10.6: What is the percentage (%) target? | 17.00% |
| 10.7: What year is the target to be reached (select the last day of the target year)? | 30-Apr-2023 |
| 1.6: Do you have a formal policy and/or formal strategy in place on the gender composition of your governing body? | No |
| | Not aware of the need |
| 1.1.a.3: How many members are on the | |
| | |

governing body and who holds the predominant Chair position?

2: If your organisation would like to provide additional information relating to governing bodies and gender equality in your workplace, do so below.

#Action on gender equality

Gender pay gaps

1: Do you have a formal policy and/or formal strategy on remuneration generally?

Yes(Select all that apply)

| Yes | Policy Strategy |
|--|---|
| 1.1: Are specific pay equity objectives included in your formal policy and/or formal strategy? | Yes(Select all that apply) |
| Yes | To achieve gender pay equity To ensure no gender bias occurs at any point in the remuneration review process (for example at commencement, at annual salary reviews, out-of-cycle pay reviews, and performance reviews) |

2: What was the snapshot date used for your Workplace Profile?

31-Mar-2022

3: Does your organisation publish its organisation-wide gender pay gap?

Yes(Select all that apply.)

| Yes | Shared internally with employees |
|-----|-------------------------------------|
| | Shared internally with shareholders |

- 4: Do you give WGEA permission to publicly publish your organisation-wide gender pay gap?

 No
- 5: If your organisation would like to provide additional information relating to gender pay gaps in your workplace, please do so below.

Employer action on pay equity

1: Have you analysed your payroll to determine if there are any remuneration gaps between women and men (e.g. conducted a gender pay gap analysis)?

Yes(Provide further details on the most recent gender remuneration gap analysis that was undertaken.)

- 1.1: When was the most recent gender remuneration gap analysis undertaken?

 1.2: Did you take any actions as a result of your gender remuneration gap analysis?

 ...No

 Within the last 12 months

 No(Select all that apply)

 No unexplained or unjustifiable gaps identified
- 2: For organisations with partnership structures: Have you undertaken a gender remuneration gap analysis ('gender pay gap analysis') in the current reporting period to determine if there are any remuneration gaps between women partners and men partners in your organisation?

3: If your organisation would like to provide additional information relating to employer action on pay equity in your workplace, please do so below.

Employee consultation

1: Have you consulted with employees on issues concerning gender equality in your workplace during the reporting period?

No(Select all that apply)

...No Not aware of the need

2: Do you have a formal policy and/or formal strategy in place on consulting employees about gender equality?

No

...No Not a priority

- 3: On what date did your organisation share your previous year's public reports with employees? 25-Aug-2021
- 4: Does your organisation have shareholders?

Yes

4.1: On what date did your organisation share your previous year's public reports with shareholders?

25-Aug-2021

5: Have you shared previous Executive Summary and Benchmark reports with the governing body?

Yes

6: If your organisation would like to provide additional information relating to employee consultation on gender equality in your workplace, please do so below.

#Flexible work

Flexible working

| 1: Do you have a formal policy and/or formal strategy on flexible working arrangements? | | |
|--|---------------------------|--|
| Yes(Select all that apply) | | |
| Yes | Policy | |
| A business case for flexibility has been established and endorsed at the leadership level | Yes | |
| Leaders are visible role models of flexible working | Yes | |
| Flexible working is promoted throughout the organisation | Yes | |
| Targets have been set for engagement in flexible work | No(Select all that apply) | |
| No | Not aware of the need | |
| Targets have been set for men's engagement in flexible work | No(Select all that apply) | |
| No | Not aware of the need | |
| Leaders are held accountable for improving workplace flexibility | Yes | |
| Manager training on flexible working is provided throughout the organisation | No(Select all that apply) | |
| No | Not aware of the need | |
| Employee training is provided throughout the organisation | No(Select all that apply) | |
| No | Not aware of the need | |
| Team-based training is provided throughout the organisation | No(Select all that apply) | |
| No | Not aware of the need | |
| Employees are surveyed on whether they have sufficient flexibility | No(Select all that apply) | |
| No | Not aware of the need | |
| The organisation's approach to flexibility is integrated into client conversations | No(Select all that apply) | |
| No | Not aware of the need | |
| The impact of flexibility is evaluated (e.g. reduced absenteeism, increased employee engagement) | No(Select all that apply) | |
| No | Not aware of the need | |

| | Metrics on the use of, and/or the impact of, flexibility measures are reported to key management personnel | No(Select all that apply) |
|---|--|--|
| | No | Not aware of the need |
| | Metrics on the use of, and/or the impact of, flexibility measures are reported to the governing body | No(Select all that apply) |
| | No | Not a priority |
| 2 | 2: Do you offer any of the following flexible working | ng options to MANAGERS in your workplace? |
| | Flexible hours of work | Yes(Select one option only) |
| | Yes | SAME options for women and men(Select all that apply) |
| | SAME options for women and men | Informal options are available |
| | Compressed working weeks | Yes(Select one option only) |
| | Yes | SAME options for women and men(Select all that apply) |
| | SAME options for women and men | Informal options are available |
| | Time-in-lieu | Yes(Select one option only) |
| | Yes | SAME options for women and men(Select all that apply) |
| | SAME options for women and men | Informal options are available |
| | Telecommuting (e.g. working from home) | Yes(Select one option only) |
| | Yes | SAME options for women and men(Select all that apply) |
| | SAME options for women and men | Informal options are available |
| | Part-time work | Yes(Select one option only) |
| | Yes | SAME options for women and men(Select all that apply) |
| | SAME options for women and men | Formal options are available |
| | Job sharing | Yes(Select one option only) |
| | Yes | SAME options for women and men(Select all that apply) |
| | SAME options for women and men | Informal options are available |
| | Carer's leave | Yes(Select one option only) |
| | Yes | SAME options for women and men(Select all that apply) |
| | SAME options for women and men | Formal options are available |
| | Purchased leave | No(You may specify why the above option is not available to your employees.) |
| | No | Not a priority |
| | Unpaid leave | Yes(Select one option only) |
| | | SAME options for women and men(Select all |
| | | |

| Yes | that apply) |
|--------------------------------|------------------------------|
| SAME options for women and men | Formal options are available |

3: Are your flexible working arrangement options for NON-MANAGERS the same as the options

| for managers above? | | |
|--|--|--|
| No | | |
| 3.1: You need to indicate which of the following flexible working options are available to NON-MANAGERS in your workplace. | Yes(Select one option only) | |
| Flexible hours of work | | |
| Yes | SAME options for women and men(Select all that apply) | |
| SAME options for women and men | Formal options are available | |
| Compressed working weeks | Yes(Select one option only) | |
| Yes | SAME options for women and men(Select all that apply) | |
| SAME options for women and men | Informal options are available | |
| Time-in-lieu | Yes(Select one option only) | |
| Yes | SAME options for women and men(Select all that apply) | |
| SAME options for women and men | Formal options are available | |
| Telecommuting (e.g. working from home) | Yes(Select one option only) | |
| Yes | SAME options for women and men(Select all that apply) | |
| SAME options for women and men | Informal options are available | |
| Part-time work | Yes(Select one option only) | |
| Yes | SAME options for women and men(Select all that apply) | |
| SAME options for women and men | Formal options are available | |
| Job sharing | Yes(Select one option only) | |
| Yes | SAME options for women and men(Select all that apply) | |
| SAME options for women and men | Informal options are available | |
| Carer's leave | Yes(Select one option only) | |
| Yes | SAME options for women and men(Select all that apply) | |
| SAME options for women and men | Formal options are available | |
| Purchased leave | No(You may specify why the above option is not available to your employees.) | |
| No | Not a priority | |
| Unpaid leave | Yes(Select one option only) | |
| | SAME options for women and men(Select all | |

| Yes | that apply) |
|--------------------------------|------------------------------|
| SAME options for women and men | Formal options are available |

4: Has your organisation implemented an 'all roles flex' approach to flexible work?

Don't know / Not applicable

5: Did you see an increase, overall, in the approval of FORMAL flexible working arrangements for your workforce during the 2021-22 reporting period?

No

6: If your workplace includes hybrid teams (i.e. some employees in a team work remotely while other employees in a team work at the organisation's usual workplace), have any of the following measures been utilised to ensure the fair treatment of all employees regardless of work location?

Employee performance is measured by performance and not presenteeism

7: If your organisation would like to provide additional information relating to flexible working and gender equality in your workplace, including specific changes due to the impact of the COVID-19 pandemic on your workplace, please do so below.

#Employee support

Paid parental leave

1: Do you provide employer funded paid parental leave regardless of carer's status (i.e. primary/secondary) in addition to any government funded parental leave scheme?

| 1.1: Do you provide employer funded paid parental leave for primary carers in addition to any government funded parental leave scheme? 1.1.a: Please indicate whether your employer-funded paid parental leave for primary carers is available to: 1.1.b: Please indicate whether your employer-funded paid parental leave for primary carers covers: 1.1.c: How do you pay employer funded paid parental leave to primary carers? 1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave? 1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided? 1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave? 1.1.g.1: How long is the qualifying period? 12 |
|---|
| employer-funded paid parental leave for primary carers is available to: 1.1.b: Please indicate whether your employer-funded paid parental leave for primary carers covers: 1.1.c: How do you pay employer funded paid parental leave to primary carers? 1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave? 1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided? 1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carears, including casuals? 1.1.g: Do you require primary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave? All, regardless of gender Birth Adoption Stillbirth Paying the employee's full salary Yes, on employer funded parental leave 18 91-100% Yes |
| employer-funded paid parental leave for primary carers covers: 1.1.c: How do you pay employer funded paid parental leave to primary carers? 1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave? 1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided? 1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals? 1.1.g: Do you require primary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave? Adoption Stillbirth Paying the employee's full salary Yes, on employer funded parental leave 18 91-100% |
| paid parental leave to primary carers? 1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave? 1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided? 1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals? 1.1.g: Do you require primary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave? |
| contribution to your primary carers while they are on parental leave? 1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided? 1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals? 1.1.g: Do you require primary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave? Yes, on employer funded parental leave 18 91-100% Yes |
| employer funded paid parental leave for primary carers is provided? 1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals? 1.1.g: Do you require primary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave? |
| workforce has access to employer funded paid parental leave for primary carers, including casuals? 1.1.g: Do you require primary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave? 91-100% Yes |
| for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave? |
| 1.1.g.1: How long is the qualifying period? |
| g |
| 1.1.h: Do you require primary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth? |
| 1.1.h: Do you require primary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth? Within 12 months |
| Yes |

| parental leave for secondary carers in addition to any government funded parental | No(You may specify why employer funded paid parental leave for secondary carers is not available.) |
|---|--|
| No | Not aware of the need |

2: If your organisation would like to provide additional information relating to paid parental leave and gender equality in your workplace, please do so below.

Support for carers

| 1: Do you have a formal policy and/or formal straresponsibilities? | tegy to support employees with family or caring |
|--|---|
| No(Select all that apply) | |
| No | Not a priority |
| 2: Do you offer any of the following support mech responsibilities? | anisms for employees with family or caring |
| Employer subsidised childcare | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| On-site childcare | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Breastfeeding facilities | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Childcare referral services | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Internal support networks for parents | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Return to work bonus (only select if this bonus is not the balance of paid parental leave) | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Information packs for new parents and/or those with elder care responsibilities | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Referral services to support employees with family and/or caring responsibilities | Yes(Please indicate the availability of this support mechanism.) |
| Yes | Available at ALL worksites |
| Targeted communication mechanisms (e.g. intranet/forums) | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| | |

| Support in securing school holiday care | No(You may specify why the above support mechanism is not available to your employees.) |
|--|---|
| No | Not aware of the need |
| Coaching for employees on returning to work from paid parental leave | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Parenting workshops targeting mothers | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Parenting workshops targeting fathers | No(You may specify why the above support mechanism is not available to your employees.) |
| No | Not aware of the need |
| Other (provide details) | No |

3: If your organisation would like to provide additional information relating to support for carers in your workplace, please do so below.

Sex-based harassment and discrimination

1: Do you have a formal policy and/or formal strategy on sex-based harassment and discrimination prevention?

| Yes(Select all that apply) | |
|--|--------|
| Yes | Policy |
| 1.1: Do you provide a grievance process in any sex-based harasssment and discrimination prevention formal policy and/or formal strategy? | Yes |

2: Do you provide training on sex-based harassment and discrimination prevention to the following groups?

| All managers | Yes(Please indicate how often is this training provided (select all that apply):) |
|---------------|---|
| Yes | Every one-to-two years At induction |
| All employees | Yes(Please indicate how often is this training provided (select all that apply):) |
| Yes | At induction Varies across business units |

3: If your organisation would like to provide additional information relating to sex-based harassment and discrimination, please do so below.

Family or domestic violence

1: Do you have a formal policy and/or formal strategy to support employees who are experiencing family or domestic violence?

| No(Select all that apply) | |
|---------------------------|-----------------------|
| No | Not aware of the need |

2: Other than a formal policy and/or formal strategy, do you have the following support mechanisms in place to support employees who are experiencing family or domestic violence?

| Employee assistance program (including access to psychologist, chaplain or counsellor) | Yes |
|---|-------------------------------------|
| Training of key personnel | No(Select all that apply) |
| No | Not aware of the need |
| A domestic violence clause is in an enterprise agreement or workplace agreement | No(Select all that apply) |
| No | Not aware of the need |
| Workplace safety planning | Yes |
| Access to paid domestic violence leave (contained in an enterprise/workplace agreement) | No(Select all that apply) |
| No | Not aware of the need |
| Currently under development | |
| Access to unpaid domestic violence leave (contained in an enterprise/workplace agreement) | No(Select all that apply) |
| No | Not aware of the need |
| Currently under development | |
| Access to paid domestic violence leave (not contained in an enterprise/workplace agreement) | No(Select all that apply) |
| No | Not aware of the need |
| Currently under development | |
| Access to unpaid leave | Yes(Is the leave period unlimited?) |
| Yes | Yes |
| Confidentiality of matters disclosed | Yes |
| Referral of employees to appropriate domestic violence support services for expert advice | Yes |
| Protection from any adverse action or discrimination based on the disclosure of domestic violence | Yes |
| Flexible working arrangements | Yes |
| Provision of financial support (e.g. advance bonus payment or advanced pay) | No(Select all that apply) |
| No | Not aware of the need |
| Offer change of office location | Yes |
| Emergency accommodation assistance | No(Select all that apply) |
| | |
| | |

| Access to medical services (e.g. doctor or nurse) | Yes |
|---|-----|
| Other (provide details) | No |

^{3:} If your organisation would like to provide additional information relating to family and domestic violence affecting your workplace, please do so below.

#Diversity and inclusion

Voluntary section

1: Do you have a formal policy and/or formal strategy on diversity and inclusion in your organisation?

Yes(Select all that is covered.)

Aboriginal and/or Torres Strait Islander identity
Cultural and/or language and/or race/ethnicity
background
Gender identity
Age
Disability and/or accessibility
Sexual orientation
Other(Provide details)

...Other

Religion and Marital Status

2: Do you collect data on whether employees identify as Aboriginal and/or Torres Strait Islander? Yes

...If this data can be shared and is not confidential, please complete the below table:

3: Do you currently collect data on any of the following dimensions of employees' identities?

Cultural and/or language and/or race/ethnicity background

Gender identity