



Modern Slavery Policy

DOCUMENT HISTORY

Document Accountability

TERM	DEFINITION	POSITION/NAME
Owner	Accountable for approval and has authority to implement or significantly change the system.	General Counsel
Custodian	Accountable for monitoring the application of the system and advising the owner of the monitoring outcomes	Compliance Manager

Document Version Control

REVISION	DATE	AUTHOR	CHANGE DESCRIPTION	APPROVED BY
0	29/06/22	Compliance Manager	Original	Board

TABLE OF CONTENTS

1. Terms and Definitions	4
2. Purpose	4
3. Scope	4
4. Principles	4
5. Compliance and Review	5
6. Appendices	6
6.1 Appendix 1 – related documents.....	6

1. TERMS AND DEFINITIONS

In this Policy:

Modern Slavery	means situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom. It is a crime and a violation of fundamental human rights. It can take various forms, including: <ul style="list-style-type: none">• trafficking in persons;• slavery;• servitude;• forced marriage;• forced labour;• debt bondage;• deceptive recruiting for labour or services; and• the worst forms of child labour (being situations where children are subjected to slavery, or similar practices, or engaged in hazardous work). <p><i>As described in the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities published by the Australian Government Department of Home Affairs.</i></p>
Stanmore	means Stanmore Resources Limited and its related bodies corporate.
UN	means United Nations.
worker	means any person who undertakes work for Stanmore whether as an employee or contractor.

2. PURPOSE

Stanmore Resources Limited and its related bodies corporate (referred to collectively as Stanmore) have a strong commitment to social responsibility. The purpose of this Policy is to:

- ensure that the goods and services purchased through our supply and value chains are ethical and minimise Modern Slavery risks; and
- set out the responsibilities of Stanmore, our personnel, operations and suppliers in observing and upholding Stanmore' position on Modern Slavery.

3. SCOPE

This Policy applies to all directors, officers, employees and contractors (including service providers and suppliers) engaged by and undertaking work on behalf of Stanmore (**Personnel**) wherever they may be located. It applies to all of Stanmore's operations, activities and dealings with third parties including private organisations, individuals or any representatives of such persons.

4. PRINCIPLES

Stanmore is committed to comply with all national laws and uphold international principles and standards relating to human rights and Modern Slavery within our operations, activities and supply chains. Combatting human rights issues takes a collaborative effort. We are committed to doing our part by reporting on the risks

of modern slavery in our operations and supply chain under the *Modern Slavery Act* (Cth) 2018 as well as other similar laws which may apply to us. We will continually assess and improve how we manage the risk of modern slavery practices within our supply chains and operations.

Our approach to human rights standards is informed by the *UN Guiding Principles on Business and Human Rights* and reflects internationally recognised human rights and rights at work, including the *UN International Bill of Human Rights*, the *International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work* and other ILO Declarations and Conventions relating to labour and employment. Although not included in the definition of Modern Slavery, Stanmore acknowledges that practices such as substandard working conditions or underpayment of workers can escalate into Modern Slavery.

We apply the following standards in our recruitment and employment practices and expect the same from our suppliers:

1. **Child labour is not used.** We will not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it will be 15 years of age. Workers under the age of 18 must only perform work in accordance with legal requirements (e.g. with regards to working time, wages and working conditions) and subject to any requirement regarding education or training.
2. **Employment is freely chosen.** We will not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (eg passports, work permits or any other personal legal documents). We do not require any payment connected to obtaining or maintaining employment throughout the hiring process and the employment period. We are responsible for payment of all fees and expenses (eg licences and levies) relating to workers, where legally required.
3. **Humane treatment.** Punishment and/or mental or physical coercion are prohibited. Disciplinary policies and procedures must be clearly defined and communicated to workers. No worker's personal freedom may be unreasonably or coercively restricted.
4. **Fair wages and conditions.** We comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, wages and benefits. We pay workers in a timely manner and clearly convey the basis on which workers are being paid. Deductions from wages as a disciplinary measure are not allowed if not legally permitted, and even where legally permitted, should be minimised.
5. **Freedom of association and collective bargaining.** Workers must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. We recognise and respect the right to collectively bargain in accordance with applicable laws.
6. **Worker equality.** We promote an inclusive work environment that values the diversity of our workers. We do not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under applicable laws.
7. **Worker safety.** We implement high standards of occupational health and safety by applying a health and safety management approach appropriate to our business.

5. COMPLIANCE AND REVIEW

The Board of Stanmore Resources Limited has overall responsibility for ensuring this Policy complies with Stanmore's legal and ethical obligations and that all those under our control comply with it.

Stanmore has an established Whistleblower system in place to ensure that anyone can raise concerns about actual or suspected misconduct or an improper state of affairs without fear of reprisal or retaliation. For information about how to report a breach, or potential breach, of this Policy, or a potential offence involving Modern Slavery, by Stanmore or its Personnel, please refer to our Whistleblower Policy at stanmore.net.au.

6. APPENDICES

6.1 Appendix 1 – related documents

a) Stanmore Resources documents

The following documents relate to this Policy:

TYPE	DOCUMENT TITLE
Tier 1: Policy	NA
Tier 2: Procedure/Plan	NA
Tier 3: Instruction/Form/ Template/Checklist	NA
Other	Annual Modern Slavery Statement