

2022

**Modern  
Slavery  
Statement**

## Disclosure Notes

This Statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) for the period 1 July 2021 to 30 June 2022. This is a joint statement made under Section 14 of the Modern Slavery Act on behalf of the following entities, which we have determined are reporting entities under the Modern Slavery Act for the reporting period:

- **Newcrest Mining Limited** (ACN 005 683 625), the Group's parent company.
- **Newcrest Operations Limited** (ACN 009 221 505), which holds a 30% interest in the Telfer mine (a joint venture with Newcrest Mining Limited) and interests in a number of exploration tenements throughout Australia.
- **Cadia Holdings Pty Limited** (ACN 062 648 006), which owns and operates the Cadia Valley Operation.
- **Lihir Gold Limited** (ARBN 069 803 998), owner and operator of the gold mine and supporting infrastructure and services located on Lihir Island in the New Ireland province of Papua New Guinea (**PNG**). Its registered office is in PNG.

This Statement describes the steps taken by the reporting entities above and their owned and controlled entities (**Newcrest** or **the Group**) to assess and address Newcrest's modern slavery risks.

Unless expressly stated otherwise, references to 'we,' 'us' and 'our' refer to the Group, including the reporting entities listed above. This Statement does not extend to non-operated sites unless expressly stated.

This Statement has not been externally assured.

This Statement has been reviewed for legal compliance.

This Statement in its entirety was approved by Newcrest Mining Limited's Board of Directors on 10 November 2022 on behalf of itself and the other reporting entities listed above and has been signed by the Chair and the Managing Director and Chief Executive Officer (page 4).



“Ultimately, our actions underpin our **commitment to our values**, including caring about people.”



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## Our Values



Caring about  
people



Integrity  
and honesty



Working  
together



Innovation  
and problem  
solving



High  
performance



# Message from the Chair and Managing Director & Chief Executive Officer

We are pleased to publish our third annual Modern Slavery Statement. Our progress over the last year has focused on continuing to strengthen our policy and governance frameworks, due diligence activities and grievance mechanisms.

Building on last year's efforts, our Procurement team has undertaken further deep dive risk reviews into high-risk areas of our supply chains. We recognise that our most severe modern slavery risks are likely to surpass our first tier suppliers. They have also continued to strengthen our supplier due diligence approach.

We are also working to identify how we can improve the effectiveness of the channels through which stakeholders can raise concerns with us.

A key focus in FY23 will be continuing to integrate human rights, including modern slavery risk management activities, across our business. This approach supports the delivery of our Integrated Sustainability Framework (ISF) through greater engagement, accountability and capacity building.

Ultimately, our actions underpin our commitment to our values, including caring about people. At the heart of all our efforts, we work to respect the human rights of those in our value chain.

Through this work, we recognise the need for more collaboration – between business partners and across sectors and stakeholder groups. We look forward to working with our stakeholders to drive this work forward.

This Statement has been approved by the Board of Newcrest Mining Limited.



**Peter Tomsett**  
Chairman



**Sandeep Biswas**  
Managing Director and  
Chief Executive Officer

10 November 2022





## Key actions during FY22

- Strengthened the governance documentation suite for our supplier due diligence approach.
- Identified our salient human rights issues, which include labour rights, including modern slavery.
- Conducted deep dive modern slavery risk reviews into purchases of solar panels, and Papua New Guinea-based suppliers, including labour hire, at Lihir.
- Conducted a detailed review of the effectiveness and assessment criteria for our Supplier Sustainability Questionnaire approach.
- Completed a review into the effectiveness of our site-level community grievance mechanisms against the UN Guiding Principles on Business and Human Rights.
- Undertook an independent third-party audit of our corporate-level human rights approach, including governance, systems and controls.



# 1. Our structure, operations and supply chains

## Our business, structure and operations

Newcrest is the largest gold producer listed on the Australian Securities Exchange (ASX, TSX, PNGX: NCM) and is one of the world's largest gold mining companies. Our headquarters are in Melbourne, Australia.

Newcrest owns and operates a portfolio of predominately low-cost, long-life mines and has a strong pipeline of brownfield and greenfield exploration projects. We produce gold doré, sold to gold refineries in Australia, and mineral concentrates exported to smelters located predominantly in Asia.

Newcrest Mining Limited is the Group's parent company. It has a number of owned and controlled entities, including the other reporting entities listed on page 2. Our owned and controlled entities include those that hold our operating mines and investments and those that provide various services to the Group.

### Operating mines

Operation	Location	Ownership
Cadia	Orange, New South Wales, Australia	100%
Lihir	New Ireland Province, Papua New Guinea	100%
Telfer	Pilbara, Western Australia	100%
Red Chris JV	British Columbia, Canada	70%
Brucejack	British Columbia, Canada	100%
Fruta del Norte	Zamora-Chinchipe Province, Ecuador	32%

### Advanced projects

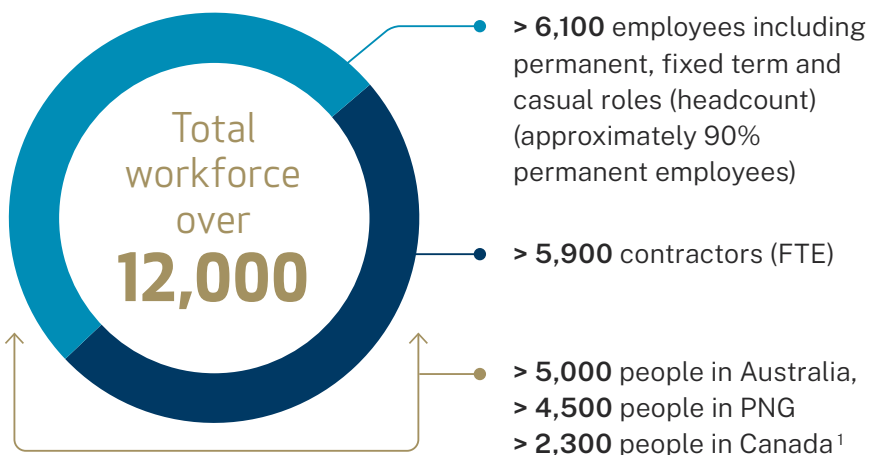
Advanced projects	Location	Ownership
Havieron JV & Farm In	Pilbara, Western Australia	70%
Wafi-Golpu JV	Morobe Province, Papua New Guinea	50%
Namosi JV – Waisoi Project	Namosi Province, Fiji	72.88%

In addition to our operating mines, we also have development projects and exploration sites globally. Our wholly or majority-owned and managed exploration sites are in Australia, Canada, Fiji, PNG and Ecuador. This includes the Havieron project in Western Australia (70% owned and operated). We also have a 50% interest in the Wafi-Golpu Joint Venture, an advanced exploration project in PNG currently in the permitting stage, which is jointly operated by Newcrest and Harmony Gold Mining Company Limited (*Harmony*) (but not controlled by Newcrest).

We have a number of investments in minority-owned and operated, and minority-owned and non-operated, exploration projects under joint venture, as well as farm-in and option arrangements. These exploration projects are in Australia, the United States, Chile, Ecuador and PNG.

Additional information about our assets, owned and controlled entities, and investments are available on our website and in our [2022 Annual Report](#).

### Newcrest's workforce as at 30 June 2022



A high proportion of our workforce is skilled (e.g. tradespeople) or semi-skilled (e.g. machine operators, truck drivers, etc).

<sup>1</sup> We also have small numbers of people in Chile, Ecuador, United States, Fiji, Indonesia.



# Our assets and top 10 supplier countries

**2. Canada** 14% 597

- Fixed plant
- Mobile plant

**5. United States** 1% 99

- General consumables
- Corporate

**9. Chile** <1% 7

- Grinding
- Professional services

**KEY** % of total spend # of suppliers Top spend categories

HIGH 10 9 8 7 6 5 4 3 2 1 LOW

The scale indicates the estimated prevalence of modern slavery in a country and is taken from the Global Slavery Index 2018.

**7. Germany** <1% 12

- Ocean freight
- Chemicals

**6. South Korea** <1% 2

- Ocean freight
- Chemicals

**9. Hong Kong** <1% 7

- Ocean freight
- General consumables

**8. Malaysia** <1% 2

- Chemicals
- Professional services

**4. Singapore** 5% 27

- Fuel and lubes
- Mobile plant

**3. PNG** 8% 439

- Site support
- Engineering and construction

**1. Australia** 69% 2,569

- Engineering and construction
- Fixed plant



## Our supply chains

Newcrest has diverse global supply chains through which we procure a range of goods and services to support our exploration, mining, processing, transportation and corporate support activities.

Our procurement is managed by a central Procurement function based in Melbourne. The function is responsible for procurement governance, strategically important, high risk or complex categories. We also have site procurement teams.

The majority of our supplier spend is engaged on agreed standard condition contracts over longer rather than shorter timeframes (three or more years).

### Number of Direct Suppliers per Region



- Asia Pacific
- Africa
- North America (including Canada)
- Latin America and the Caribbean
- Europe

## Key goods and services procured



### Exploration

- Drilling services
- Core analysis services



### Development

- Engineering and construction services
- Original Equipment Manufacturer (OEM) processing plant
- Contract mining development services



### Mining

- Explosives
- Fuel and lubricants
- Mining fleet and spare parts (trucks, excavators, drill rigs, ancillary fleet, etc.)
- Contract mining and maintenance services



### Processing

- Electricity supply (grid or on site generation)
- Processing chemicals
- Mill consumables
- Electrical spares
- Contract labour for maintenance



### Customer

- Road, rail and ocean freight services
- Storage shed facility services

### Support activities

- Freight services (for inbound materials)
- Camp, catering and cleaning services (site support services) for remote mine site locations
- Air charter services
- General consumables (Personal Protective Equipment (PPE), clothing, industrial hardware, etc.)

## Total spend: **US\$3.1 billion**

(excluding government and tax payments)

**3,878** direct suppliers located in **42** countries.

**97%** of operational spend with direct suppliers in five countries: Australia, Canada, PNG, Singapore and the United States.

We acknowledge that goods and services supplied by our direct/Tier 1 suppliers (the entities we directly contract with) may not be manufactured or provided in those direct suppliers' countries but in jurisdictions that are at higher risk for modern slavery.

### Top spend categories:

- 11% fixed plant (including equipment and machinery)
- 11% engineering and construction services
- 10% mobile plant (mining fleet, including new plant purchases)
- 10% fuel and lubricants
- 8% contract mining services (ranging from blasting and mine to mill material movement through to mine dewatering and waste material movement)
- 6% maintenance services (including related contract labour)
- 6% site support (camp, catering and air charter services)





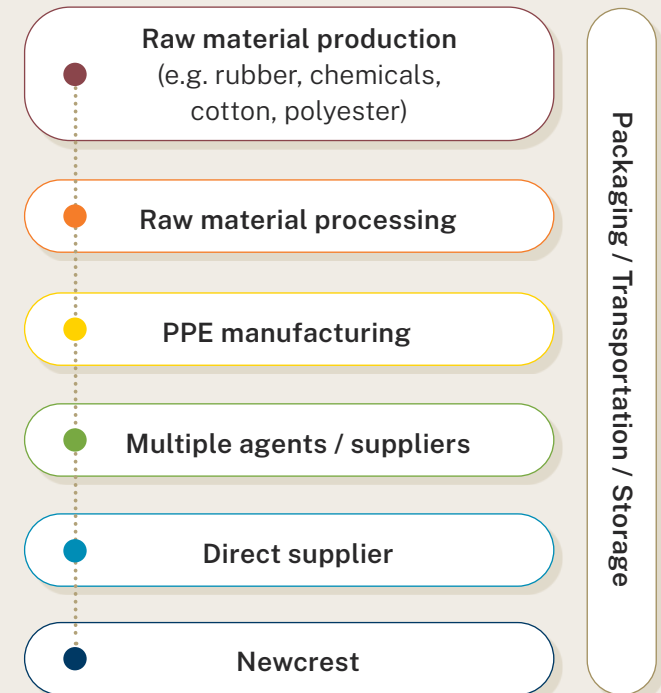
## Mapping our supply chains beyond our direct suppliers

We acknowledge that many of the goods and services we procure have long, complex and opaque supply chains, with the most severe human rights risks sitting beyond our direct suppliers. We have been undertaking deep dive risk reviews into our high-risk categories to continue building the visibility of our supply chains beyond tier one and our understanding of related modern slavery risks (as outlined in Section 3).

One deep dive risk review undertaken in FY21 was in relation to Personal Protective Equipment (PPE) (discussed in our [2021 Modern Slavery Statement](#), but described in further detail here to illustrate the complexities of our supply chains), which we traced back to manufacturing facilities. We mapped our direct suppliers' PPE manufacturing locations to Australia, China, Fiji, Finland, India, Indonesia, Laos, Poland, Singapore, South Korea, Sri Lanka, Taiwan, United Kingdom, USA and Vietnam.

A simplified diagram of the PPE value chain illustrates its complexity, with labour exploitation risks, including modern slavery at many points.

This complexity is replicated across most of the goods and services we purchase, and we continue to undertake deep dive risk reviews of high-risk categories to better understand our supply chains beyond our direct suppliers. Gaining visibility into further tiers of our supply chains allows us to work more collaboratively with suppliers to mitigate these risks.





## 2. Our modern slavery risks

Modern slavery constitutes one of the most egregious abuses of human rights. It is defined in the Modern Slavery Act to include forced labour, slavery, forced marriage, human trafficking, debt bondage, servitude, deceptive recruiting for labour or services, and the worst forms of child labour.

In identifying our modern slavery risks in this Statement, we consider the ways we could cause, contribute to, or be directly linked to modern slavery based on the UN Guiding Principles on Business and Human Rights (UN Guiding Principles).

In 2018 and 2020, we engaged external advisers (Pillar Two and another advisory firm) to help us identify the modern slavery risks in our operations and supply chains. These analyses included country risks (for both the operations and supply chain assessments) and category risks (for the supply chain assessments). The analyses used a range of tools and resources, including the Global Slavery Index and US Department of Labor reports concerning child labour and human trafficking. In FY22, our procurement team's continued supply chain due diligence work confirmed the modern slavery risks identified in these assessments remain current.

### Cause, Contribute, Directly linked

To describe our risk of involvement in modern slavery in this modern slavery statement, we use the concepts of cause, contribute and directly linked as set out in the UN Guiding Principles.

Type of involvement	Explanation	Examples of potential application in the extractive sector
<b>Cause</b>	A company may cause modern slavery if its own actions or omissions directly result in such practices.	A company uses the worst forms of child labour, including hazardous child labour, by employing children to mine gold and precious metals on their site.
<b>Contribute</b>	A company may contribute to modern slavery if its actions or omissions in its operations or supply chains contribute to such practices.	A company places unrealistic costs and timeframes on a supplier, which could only be met if they used exploited labour.
<b>Directly linked</b>	A company's operations, products or services may be directly linked to modern slavery through the activities of another entity it has a business relationship with, such as with a joint venture partner or supplier, entities the company does not have a direct contractual relationship with.	A company procures manufactured goods using forced labour, even if this was multiple tiers down the supply chain.

## Operations

Although we have assessed that modern slavery risks are more significant in our supply chains than in our operations, we acknowledge there is a risk of involvement in modern slavery through our operations. For example, there is a risk that:

- we could *cause* modern slavery if we employed exploited workers, such as workers under 18 years of age in hazardous conditions, which we acknowledge is a heightened risk in Papua New Guinea due to less reliable birth data;
- we could *contribute* to modern slavery if we hired workers through a labour broker and allowed the broker to charge recruitment fees to the workers;
- we could be *directly linked* to modern slavery through our joint ventures and non-operated explorations if a joint venture partner used exploited labour on a project that we had an interest in.

We have a number of policies and processes in place to mitigate our operational risks, including recruitment and employment processes and third party due diligence processes, as described in Section 3.

## Supply chains

We also recognise that we could be involved in modern slavery through our supply chains. For example, there is a risk that:

- we could be *directly linked* to modern slavery if the goods or services we procure (or any inputs into them, or transportation or storage of them) have been produced or undertaken using forced labour;
- we could *contribute* to modern slavery if we placed unreasonable cost or delivery expectations on suppliers that could only be met using exploited labour.

Our supply chain risks in relation to modern slavery are more significant beyond our direct suppliers.





During the reporting period, we conducted deep dive modern slavery risk reviews – that is, due diligence into our supply chains beyond our direct suppliers – in relation to purchases of solar panels, and PNG-based suppliers, including labour hire, at Lihir (see case studies on pages 16 and 18).

We have a number of policies and processes in place to mitigate our supply chain risks, including supply chain due diligence processes, as described in Section 3.



## Overview of high-risk categories

We have identified the following procurement categories as high risk for modern slavery.

Category	Key risk factors
<p><b>PPE and other apparel</b></p> <p> <i>Case study included in our <a href="#">2021 Statement</a></i></p>	<ul style="list-style-type: none"> <li>• The manufacture of PPE and apparel generally involves lower skilled, lower paid workers, who may also have other vulnerabilities (including migrant workers).</li> <li>• Work is often undertaken in higher risk jurisdictions.</li> <li>• PPE and apparel often have long, complex and non-transparent supply chains and include high risk inputs like raw materials.</li> <li>• The COVID-19 pandemic exacerbated modern slavery risks relating to PPE as demand for these products surged.</li> </ul>
<p><b>Ocean freight</b></p> <p> <i>Case study included in our <a href="#">2021 Statement</a></i></p>	<ul style="list-style-type: none"> <li>• Ocean freight generally involves lower skilled workers and significant numbers of migrant workers.</li> <li>• The sector often involves labour recruiters, with risks of misleading and exploitative recruitment practices.</li> <li>• The COVID-19 pandemic exacerbated modern slavery risks in ocean freight with the introduction of significant restrictions on changing crew at ports. Many crews faced challenges leaving ships even after their contracts had ended.<sup>2</sup></li> </ul>
<p><b>Labour hire and contractors on site</b></p> <p> <i>Case study included on page 16</i></p>	<ul style="list-style-type: none"> <li>• The use of labour hire agencies and other third party intermediaries to recruit, hire and/or manage workers increases modern slavery risks.</li> <li>• The sector can give rise to misleading recruitment and the charging of recruitment fees.</li> <li>• Migrant workers are often particularly vulnerable to exploitation through labour hire agencies.</li> </ul>
<p><b>Office, site and mining support (including cleaning, catering, security and operational and mining support particularly involving manual labourers)</b></p> <p> <i>Case study included in our <a href="#">2021 Statement</a></i></p>	<ul style="list-style-type: none"> <li>• A number of these areas generally involve lower skilled, lower paid manual labour.</li> <li>• Workers with other vulnerabilities (including migrant workers) are often used and sub-contracting is common.</li> </ul>

<sup>2</sup> See, for example, the Joint Statement by the UN Human Rights Office (Office of the High Commissioner for Human Rights), the UN Global Compact and the UN Working Group on Business and Human Rights, [The COVID-driven humanitarian crisis of seafarers: A call for action under the UN Guiding Principles on Business and Human Rights](#) (5 October 2020).



Category	Key risk factors
<b>Information technology (IT)</b>	<ul style="list-style-type: none"> <li>IT equipment manufacture generally involves lower skilled workers, who may also have other vulnerabilities (including migrant workers).</li> <li>This work is often undertaken in higher risk jurisdictions.</li> <li>IT often has long, complex and non-transparent supply chains and includes high risk inputs like raw materials.</li> </ul>
<b>Construction</b>	<ul style="list-style-type: none"> <li>Construction at mine sites carries a heightened risk of modern slavery, particularly in higher risk jurisdictions.</li> <li>Construction services suppliers often bring workers to sites, and sub-contracting is common.</li> <li>Some of the work involves lower skilled manual labour.</li> <li>Various commodities used in construction also carry heightened modern slavery risks particularly when sourced from higher risk countries (e.g. timber, bricks, gravel, cement).</li> </ul>
<b>Other goods manufactured in high-risk countries</b>  <i>Case study included on page 18</i>	<ul style="list-style-type: none"> <li>We source a number of goods that are manufactured in jurisdictions that have heightened risks of labour exploitation including modern slavery.</li> <li>Many of these manufactured goods also have their own long, complex and non-transparent supply chains and may include high risk inputs including raw materials.</li> <li>This is a broad category (for example, it includes equipment, tyres, chemicals, office consumables) and the specific modern slavery risk factors vary depending on the good.</li> <li>We have identified solar panels as an area of potential risk for forced labour and conducted a deep dive risk review to understand our solar panel purchasing activity (see page 18).</li> </ul>

*Note: These categories were identified as higher-risk through an independent supply chain risk assessment undertaken in 2018, a modern slavery risk analysis undertaken by external advisers in FY20, and our own ongoing analysis and due diligence.*

## Deep dive risk review of labour providers at Lihir

Labour hire at our Lihir operation in PNG has been identified as an area of heightened modern slavery risk. Risk factors associated with labour hire include that the work is generally low skilled, can involve vulnerable migrant workers and visa insecurity, deceptive third-party arrangements and recruitment fees, poor working conditions, and the tendency for short or seasonal contracts. PNG has been identified as a source, transit and destination country for modern slavery, including for manual labour.<sup>3</sup>

As a first step, we identified service providers to our Lihir operation, including PNG entities, which provide low, semi-skilled, trades or specialised labour to and around the mine. We then invited these entities (34 private enterprises, 37 landowner organisations and 14 other organisations) to participate in the review.

We conducted telephone interviews with participating suppliers' management teams to better understand the following assessment criteria as appropriate to the size and maturity of the organisation:

- Public commitment to human rights
- Management engagement and accountability
- Available policies and standards
- Staff and contractor training and awareness programs
- Supply chain traceability and transparency
- Risk assessment - vulnerable groups, supply chain categories and suppliers
- Purchasing practices, supplier selection and supplier contracts
- Recruitment approach and third-party arrangements

- Effective grievance, remedy and corrective action plans
- Investment – technology and dedicated resources
- Disclosure of significant issues to Newcrest
- Commitment to continuous improvement
- Concerning WorldCheck and adverse media screening alerts

We also considered the quality of each supplier's response, including their transparency, engagement and commitment to continuous improvement.

The top five potential risk areas identified through the risk review were:

1. General lack of modern slavery and human rights awareness
2. Low understanding of Newcrest's expectations
3. Awareness of risks but low accountability within suppliers (e.g. through formal policy commitments or processes)
4. Suppliers' own supply chain risks are not clearly understood or addressed
5. Little tangible evidence of current or future investment to address risks

The review was well received by the suppliers, and they demonstrated an openness and willingness to commit to continuous improvement. The process also provided an opportunity to raise awareness of labour rights' risks and share our human rights expectations.

The supplier base in this assessment is diverse and at varying maturity levels in their labour rights approaches. Although we did not find evidence of modern slavery, labour hire at our Lihir operations is an area of risk that we plan to monitor.

As a result of this deep dive, we are updating our Lihir supplier prequalification documentation to incorporate human rights and rolling out a tailored training program for our Lihir Commercial and Procurement teams to equip them better to assess suppliers in relation to this risk.

In FY24, we intend to develop a training and awareness program for our suppliers that builds on internal training to be updated in FY23. However, in the meantime, we will request suppliers within the scope of this review to acknowledge and agree to our Supplier Performance Commitments.

We recognise there are opportunities to continue strengthening the effectiveness of our deep dive reviews. For example, looking ahead, we plan to explore how we can incorporate worker voice into our processes.

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<sup>3</sup> See, for example, US Department of Labor's [2022 Trafficking in Persons Report](#).







## Deep dive risk review of solar panels

The production of solar panels and their components has been identified as an area of risk for forced labour and other forms of modern slavery. We reviewed our sourcing activities to map solar panel purchases and relevant suppliers to understand potential exposure to these risks.

We identified that the purchase of solar panels represented approximately US\$100,000 spend (<0.1% of our total spend of US\$3.1 billion). Approximately 60% of this spend relates to small-scale 3-5kw systems purchased and donated to the local Lihirian community as part of community social investment initiatives. The balance of the spend relates to ad-hoc requirements of small quantities of panels typically associated

with the sourcing of powered goods, which are required to function off-grid within a mining lease (e.g. communications stations, scientific monitoring equipment, safety signs and lighting). Small quantities are purchased to upgrade existing systems or replace damaged units.

Our supplier base is diverse and includes multiple vendors, large and small, from a range of sectors. Our suppliers typically source from large distributors based in Australia, Canada and the US. We undertook a desktop review of relevant tier one suppliers, as well as tier two suppliers that we could identify, to determine whether they manufacture, assemble and/or distribute their products, their supply chain maturity and publicly available policies

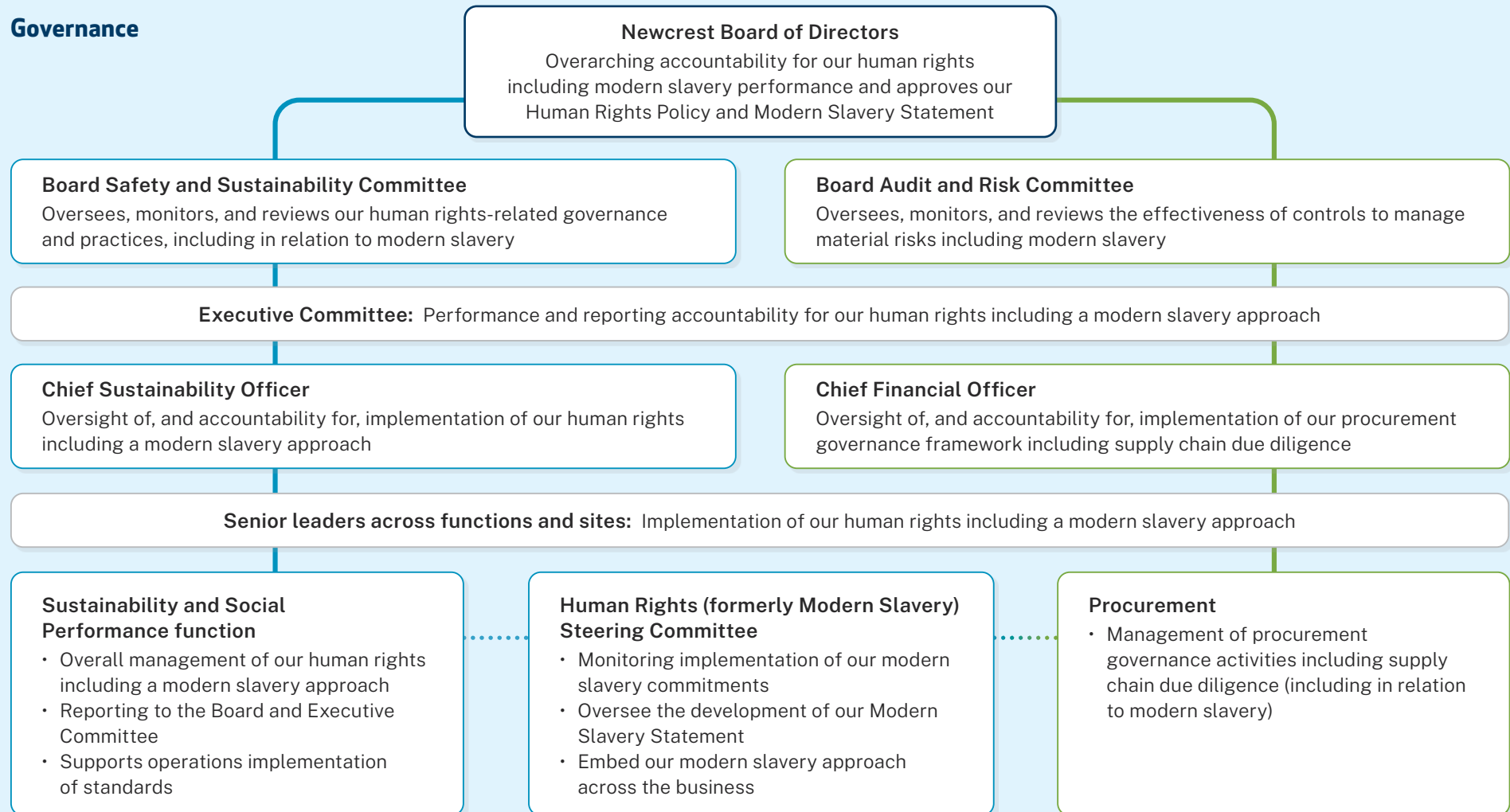
regarding human rights including modern slavery. All direct suppliers were screened using WorldCheck and no red flags for human rights or modern slavery were identified.

Through this risk review, we identified opportunities to build internal awareness of the potential risks in solar panel sourcing to assist in our supplier due diligence, purchasing decisions and ongoing contract management activities. We will monitor the purchases of solar panels to identify trends and opportunities to undertake further assessment and mitigation actions. If in the future we require a large quantity of solar panels, specific additional due diligence measures aligned to the project size and scope will be implemented as part of our market engagement strategy.

# 3. Our approach to assessing and addressing our modern slavery risks

## Governance and policies

### Governance



## Policies

We have a number of policies, standards, procedures and processes that set out our commitments – and expectations of our people, suppliers and other third parties we work with – in relation to human rights, including modern slavery.





The following table overviews key policies and standards relevant to our modern slavery approach. These apply across the Group including to all reporting entities, and to all of our majority-owned and Newcrest operated sites, including the exploration projects we operate.<sup>4</sup>

These policies and standards – and our human rights approach – are also supported by a range of other policies, standards, procedures and processes, for example, our Sustainability Policy, Security Policy and Anti-Bribery, Fraud and Sanctions Policy.

Policy / Standard	How it relates to our modern slavery approach	Key communication and implementation actions
<b>Code of Conduct</b>  <i>Publicly available</i>	<ul style="list-style-type: none"> <li>• Sets out expectations of personal and corporate conduct and the behaviour of our employees, contractors and other suppliers.</li> <li>• Sets out our commitment to respect human rights, and our expectation that suppliers will prevent child and forced or compulsory labour or other forms of modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>• All employees and contractors are made aware of our Code of Conduct.</li> <li>• Code of Conduct training is provided to all employees.</li> <li>• The Code of Conduct is communicated to suppliers through our Supplier Performance Commitments.</li> <li>• The Code of Conduct was updated during the reporting period and now includes more detailed human rights and specific modern slavery content. This includes our expectations of our people and suppliers, scenarios, contact people, and relevant escalation channels for human rights red flags.</li> </ul>
<b>Human Rights Policy</b>  <i>Publicly available</i>	<ul style="list-style-type: none"> <li>• Sets out our commitment to respect the human rights of all our stakeholders.</li> <li>• Specific commitment to not engaging in or condoning forced, compulsory or child labour, and working to ensure these are not present in our workforce or supply chain, with an express reference to modern slavery.</li> <li>• Sets expectations for employees, contractors and suppliers, and states that we seek to work with other third parties who respect human rights.</li> </ul>	<ul style="list-style-type: none"> <li>• Mandatory human rights training is provided for employees with key responsibilities related to managing human rights risks (including our human resources, security, health and procurement teams, and senior leaders including our Executive Committee). (Further information on training is on page 27.)</li> </ul>

<sup>4</sup> The policies, standards, procedures and processes do not apply to non-operated or non-controlled entities and investments including the Wafi-Golpu Joint Venture. Our general approach in relation to joint ventures and investments, including in relation to due diligence, is overviewed on pages 23 and 27; more detail is provided in relation to Wafi-Golpu on page 26.



Policy / Standard	How it relates to our modern slavery approach	Key communication and implementation actions
<b>Risk Management Policy</b>  <i>Publicly available</i>	<ul style="list-style-type: none"> <li>Sets out our approach to risk management, which applies to human rights including modern slavery risks.</li> </ul>	<ul style="list-style-type: none"> <li>Our Risk Management Policy informs our Risk Management Framework.</li> <li>We will work to strengthen how human rights, including modern slavery risks, are reflected in our risk controls and systems in FY23.</li> </ul>
<b>Speak Out Policy</b>  <i>Publicly available</i>	<ul style="list-style-type: none"> <li>Sets out our commitment to fostering a culture of trust in an environment that encourages reporting of misconduct and unethical behavior, and providing protection to those who speak out.</li> <li>Human rights-related concerns, including modern slavery, can be raised through the Speak Out channels.</li> </ul>	<ul style="list-style-type: none"> <li>Information on the Speak Out Policy and its implementation are on page 28.</li> </ul>
<b>Procurement Policy</b>  <i>Publicly available</i>	<ul style="list-style-type: none"> <li>Requires human rights considerations to be incorporated into supplier selection and contract management.</li> <li>Refers to not engaging in or condoning modern slavery and working to ensure it is not present in Newcrest's supply chain.</li> </ul>	<ul style="list-style-type: none"> <li>In FY22, we updated our Procurement Policy to align with Newcrest's vision and aspirations across five key pillars of Safety &amp; Sustainability, People, Operating Performance, Innovation &amp; Creativity and Profitable Growth.</li> <li>Commitments in our Procurement Policy relating to human rights, including modern slavery, are implemented through our supply chain due diligence activities.</li> <li>Our expectations are communicated to suppliers as part of our supplier onboarding and contracting processes.</li> </ul>
<b>Communities Policy</b>  <i>Publicly available</i>	<ul style="list-style-type: none"> <li>Outlines the principles that guide our engagement with communities.</li> <li>Specific commitment to respect community members' human rights and to establish and maintain accessible grievance processes.</li> </ul>	<ul style="list-style-type: none"> <li>We track and report stakeholder interactions, social impacts and grievances at all of our operations to assess the effectiveness of our Social Performance.</li> <li>Grievance procedures are established and available at all our operating sites.</li> </ul>
<b>Business Integrity Standard</b>	<ul style="list-style-type: none"> <li>Formally documents the integration of human rights risks into the due diligence we conduct on joint venture partners, associates, equity investments and recipients of donations and sponsorships, both prior to entering a new relationship with these parties, as well as ongoing due diligence activities.</li> </ul>	<ul style="list-style-type: none"> <li>We undertake risk-based due diligence in relation to key third parties. (Further information is on pages 22-23.)</li> </ul>

## Risk assessment

We require all suppliers to acknowledge our Supplier Performance Commitments at onboarding.

In FY22, we engaged an independent expert third party to assess our salient human rights issues – that is, the human rights at risk of the most severe negative impact through our operations and business relationships. One of our salient human rights risks is labour rights, including modern slavery, which was assessed as most salient in our supply chain.

## Operations

In addition to our Group-wide salient human rights issue assessment, we assess modern slavery and broader human rights risks in our operations in two key ways: social and environmental impact assessments and risk-based due diligence.

Our Social Performance Standard requires all operations to complete community social baseline studies and impact assessments, which encompass relevant human rights risks.

During FY22, we adopted a new Regulatory Compliance Standard, which includes the risk of Newcrest causing or being complicit in a severe or major human rights impact (which would include modern slavery) as a material risk including modern slavery. Material risks require a risk assessment and development of a compliance program, such as appropriate controls, training, monitoring, reporting and periodic reviews of the effectiveness of controls. We will be finalising relevant guidelines and beginning our rollout of the Regulatory Compliance Standard's compliance program during FY23.





Under our Anti-Bribery, Fraud and Sanctions Policy, Business Integrity Standard and Business Integrity Guideline, we also undertake risk-based due diligence in relation to associates, third parties, entry into new jurisdictions, investments and counterparties to agreements including joint venture partners. This includes WorldCheck screening and specific due diligence on human rights risks where appropriate.

The due diligence process for joint venture partners, investments, agents, donations and sponsorships considers the third

party's human rights-related policies and frameworks, legacy human rights issues and any ongoing human rights impacts. Additional due diligence is conducted for high-risk parties in high-risk jurisdictions, usually with the support of external advisors. During FY22, we re-ran WorldCheck screening for all our joint ventures and associates to check for any red flags. No human rights concerns were identified.

### Supply chains

During FY22, we updated our Procurement Policy (previously our Supply Policy), which sets out our commitment to procure from suppliers who uphold our ethical, fair and sustainable expectations. We also formalised and consolidated our supplier due diligence program into our new Procurement Governance Guidelines.

We have a number of supplier due diligence processes at the accreditation stage, during onboarding and as part of ongoing supplier monitoring and engagement. All suppliers (at onboarding and ongoing while active in our system) are screened for sanctions, adverse media, global regulatory and law enforcement information, and human rights breaches.

We communicate our expectations – which include human rights (including specific modern slavery) expectations – to suppliers

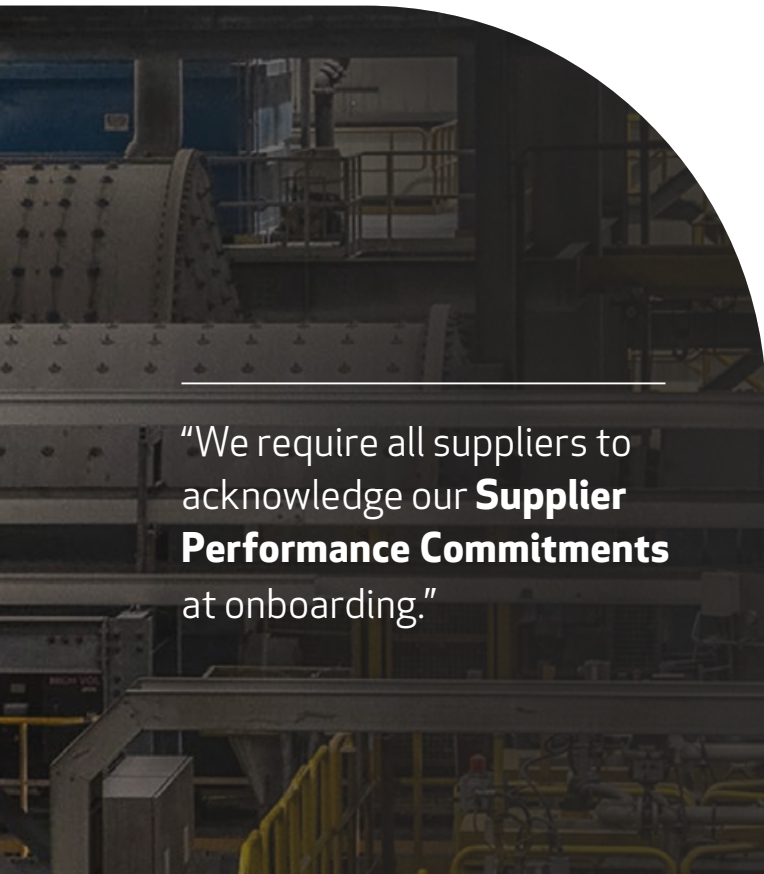
by requiring all suppliers to acknowledge our Supplier Performance Commitments at onboarding. Our standard contractual terms also include human rights provisions (discussed further on page 25).

As part of our market engagement process for more significant contracts, potential suppliers are also required to complete our Supplier Sustainability Questionnaire (SSQ). The SSQ is also issued annually to targeted high-risk suppliers that are identified based on a number of factors, including human rights risk (informed by category and country risks) and spend level.

The SSQ includes questions on the supplier's sustainability approach, business conduct, community, environment, workplace practices, workplace health and safety, human rights and modern slavery, and supply chain policies and practices.

In FY22, we issued 95 SSQs. Six suppliers ceased to supply goods and services within the period and were removed from the sample. We had a 100% response rate from the remaining suppliers. We did not identify any human rights including modern slavery concerns.

We do not currently undertake audits of suppliers in relation to modern slavery risks. As we continue to mature our supply chain due diligence approach, this remains under consideration.



“We require all suppliers to acknowledge our **Supplier Performance Commitments** at onboarding.”



## Recruitment and employment processes

We have several processes in place in relation to recruitment and employment to mitigate the risk of any labour rights violations – including the risk of modern slavery – in our workforce.

All employees are provided with a written contract of employment setting out the terms and conditions of employment, including remuneration, working hours, leave and other benefits.

Our employment contracts comply with applicable local laws.

Our remuneration is competitive, and employees receive above legislated minimum wages. We recognise the rights of all our people to join a union and collectively bargain.

Our hiring process aims to be comprehensive, non-discriminatory and non-coercive (e.g. we do not charge recruitment participation fees). Our process confirms that employees have the appropriate work rights and qualifications to perform their respective roles safely.

Where we work with third-party labour providers, including recruitment agencies, it is the responsibility of the labour supplier to ensure their employment arrangements comply with local laws applicable in the worker's jurisdiction and that wage arrangements meet or exceed the minimum standards set in the respective jurisdiction. We ensure through the tendering process that labour suppliers have compliance mechanisms in place to satisfy the labour requirements in their respective jurisdictions.

We recognise that a lack of reliable birth data in PNG can make it difficult to confirm workers' ages. We have controls in place at our operation in Lihir to mitigate the risk of employing underage workers, including a documented eligibility screening process for applicants. This confirms if an applicant is Lihirian and eligible for a Lihirian preferred role. These checks also confirm the applicant's birth date in the Village Population System (where Lihirian birth data is captured), with a requirement that workers have completed school (most roles

have a minimum entry requirement of year 12). Non-Lihirian job applicants are asked to provide evidence of their birth date that we seek to confirm with available records. Most positions open to non-Lihirians require qualifications that reduce the risk of workers being underage.

We also acknowledge that other labour rights risks are higher in PNG than in other countries we operate in, particularly in relation to contracted labour. See the case study on our deep dive risk review into labour providers at Lihir on page 16.

## Requirements for third parties

### Suppliers

Our [Supplier Performance Commitments](#) set out our expectations of suppliers, which are required to acknowledge that they will comply with these. This includes an expectation that suppliers will have policies and procedures in place to meet the expectations in our Human Rights Policy, prohibitions on the use of modern slavery and labour exploitation, protection of labour rights, including freedom of association, and effective grievance mechanisms. All suppliers that are new and/or have submitted an SSQ are required to acknowledge the Supplier Performance Commitments. We are working to extend this to all suppliers, including at contract renewal.

Our standard supplier contract templates also contain human rights clauses. Our standard major contract templates also include a right to audit suppliers in relation to their compliance with our human rights expectations. We also have the right to terminate a supplier's contract for breaches of its human rights clauses. To date, we have not terminated a supplier contract as a result of modern slavery issues. Our preference will generally be to engage and use our leverage with suppliers to encourage and support them to address issues should they arise.





## Standard major contract human rights clause

Our standard major contract templates include a human rights clause. The clause requires the supplier to:

- Agree it will not engage in conduct that is inconsistent with international human rights laws and standards including as outlined in the UN Guiding Principles, Universal Declaration of Human Rights and international humanitarian law, and applicable local laws;
- Take reasonable steps to ensure it and its own suppliers have adequate policies and procedures in place to prevent modern slavery;
- Record and report to Newcrest all credible allegations against it of human rights abuses, including instances of modern slavery.

The clause also specifically references child labour, modern slavery, the legitimate activities of trade unions and workers' representatives, wages and benefits, and health and safety.

The clause contains termination rights if the supplier breaches the human rights clause.

Our standard purchase order terms and conditions also contain a human rights clause with similar provisions.



## Wafi-Golpu Joint Venture

The Wafi-Golpu Joint Venture is an advanced exploration project in the permitting phase which is jointly managed by Newcrest and Harmony, but is not controlled by Newcrest. The main activities of the Wafi-Golpu Joint Venture currently involve community engagement and programs, environmental monitoring and activities related to the permitting process.

We conducted due diligence when we invested in the joint venture in 2008 which included consideration of social and human rights related risks. We also monitor risks relating to our investment in the joint venture on a regular basis.

A services company, owned equally by subsidiaries of Newcrest and Harmony, operates the joint venture including engagement of the joint venture's employees and leasing the joint venture's office space. The services company has a range of policies and procedures in place including in relation to employment, community engagement, and grievance mechanisms.

Newcrest does not have any employees working in the joint venture. While we have a services agreement in place with the Wafi-Golpu services company, we do not currently provide any services under that agreement. Newcrest provides reimbursement of 50% of Wafi-Golpu's costs, but does not manage Wafi-Golpu's procurement process. However, as indicated above, following a review of the modern slavery approaches of our various joint ventures (Newcrest operated and jointly operated), we aim to engage further with Harmony (which provides support for the joint venture's procurement) to share knowledge in relation to identifying and managing modern slavery risks.





## Joint venture partners and investments

Newcrest aims to build leverage with our joint ventures by setting expectations at the outset of a relationship. Our Human Rights Policy states that we seek to work with joint venture partners who respect human rights. Our standard joint venture contract contains a human rights clause which includes our expectation that joint venture partners respect human rights.

In line with our Business Integrity Guideline, we seek to conduct or share materials for training with joint ventures, including in relation to human rights, modern slavery and whistleblowing (annually for higher risk countries, every two years for medium and lower risk countries). We also undertake at least one communication each year with joint ventures about ethics and compliance issues.

During FY22, we commenced a review of our joint ventures – in particular, the jointly operated Wafi-Golpu Joint Venture, and our Newcrest-operated joint ventures Havieron, Red Chris and Namosi – to consider their approaches to modern slavery. The review was completed between the end of the reporting period and the date of this Statement. We plan to respond to the findings and the opportunities for knowledge sharing and capacity building to support continuous improvement during FY23.

Where we have a minority investment in an entity, we monitor their human rights performance through public disclosures, WorldCheck and adverse media screening. Where we hold a Board position, we brief our nominee directors about issues that arise so that they can raise them in Board meetings.

## Training, capacity building and awareness raising

We undertake various awareness-raising and capacity-building activities to help embed our human rights, including the modern slavery approach.

We have a human rights page on our intranet, where employees can access information and resources on human rights, including modern slavery, our human rights governance architecture and internal contact people.

We have human rights FAQs, including questions specifically on modern slavery, which are available to anyone with access to our intranet.

Employees with key responsibilities related to managing human rights risks are required to complete mandatory human rights training when they join and then every two years. This includes people in our human resources, security, health and procurement teams, and senior leaders including our Executive Committee.

The online training is available in English and Spanish, and includes specific modern slavery content, including an explanation of what modern slavery is, relevant expectations of employees and where employees can go if they have concerns. At the end of the training, participants complete an assessment and are asked to provide feedback.

Other human rights related training includes our Code of Conduct training, mandatory for employees to complete at induction and then every two years, and security and human rights-related training for security employees and contractors.

During FY22, our Group Procurement team engaged with the Commercial (including Procurement) team at Lihir to help build awareness around human rights, including with regard to modern slavery risks with local suppliers. We plan to continue building the capacity of our Lihir team through additional role specific training.

We have also continued to build awareness and capacity within the Procurement team more broadly through sharing our deep dive risk review outcomes.

During FY22, we continued to distribute a human rights information sheet to new suppliers reiterating our expectations of them with links to further information and resources, including our [human rights training video](#). We also continued to engage with our gold refinery partners to share knowledge and expertise about modern slavery risk management.

In FY23, we plan to update our human rights training and identify capacity-building opportunities.

## Grievance mechanisms and remediation processes

We recognise that trusted, effective grievance mechanisms play a key role in identifying and remediating modern slavery. We have a global Speak Out Policy as well as site-level grievance mechanisms to provide channels for stakeholders to raise concerns.

Where we identify that we have caused or contributed to an adverse human rights impact, we are committed to providing for or cooperating in its remediation.

### Speak Out

Our [Speak Out Policy](#), supported by our Speak Out Standard and Procedures, outline a number of channels including an independent hotline, to encourage the reporting of concerns relating to unethical, illegal or any other inappropriate behaviour, such as modern slavery or any other human rights matter, in good faith and to receive protection from any negative consequences that could otherwise result from making a report. This channel is available to employees, contractors, ex-employees, officers, suppliers (including their employees) and their relatives.

The Speak Out hotline is accessible by website, phone or a mobile app (launched during FY22) and can be used confidentially and anonymously. It is available in all jurisdictions where we operate and is operational 24/7 through an independent third-party provider, Navex Global, which provides services through their platform EthicsPoint. In addition to English, the hotline also operates in Tok Pisin, Fijian and Spanish to account for those in and around our operations in PNG, Fiji, Chile and Ecuador.

We raise awareness about our Speak Out channels with employees and contractors on our website, during induction training, on posters around our offices and sites, on our intranet, through Ethics and Compliance Champions at our sites, and via Group-wide awareness sessions. We raise awareness with suppliers through any specific engagement with them, our Supplier Performance Commitments and our supplier Human Rights Information Sheet.

A detailed graphic of our investigation process is set out in our [2021 Modern Slavery Statement](#).

Reports received via Speak Out channels during FY22 by category



\*None of the Speak Out reports in the “Social, cultural, community or human rights” category were human rights complaints.

During FY23, we plan to review the Speak Out Policy, Speak Out Standard and related procedures to identify how we can continue to improve this channel, including against the UN Guiding Principles’ effectiveness criteria for non-judicial grievance mechanisms.

## Site-level grievance mechanisms

Our Social Performance Standard requires each operating site to have a grievance mechanism tailored to the local context. The Standard is supported by our Community Concerns, Complaints and Grievances Guideline, which references the UN Guiding Principles' effectiveness criteria for non-judicial grievance mechanisms.

During FY22, we reviewed these mechanisms for effectiveness against the UN Guiding Principles and have incorporated the implementation of recommendations into our human rights work program (see the case study on page 30). During FY23, we intend to develop a Modern Slavery Response Plan to ensure we have a robust process in place in case a modern slavery incident or allegation arises in our operations or supply chains, and to support the development of a remediation approach as appropriate.

No modern slavery issues were raised through our Speak Out channels or operational-level grievance mechanisms during FY22. However, we recognise that this does not necessarily mean no such issues exist, and we will continue to look for ways to strengthen the effectiveness of our mechanisms.

## Supplier grievance mechanisms

Our Supplier Performance Commitments include an expectation that suppliers have their own effective grievance mechanism in place to consider, manage and remedy complaints. We provide human rights training material to high-risk suppliers on a case-by-case basis.





## Reviewing the effectiveness of our site-based grievance mechanisms for community members

During the reporting period, we reviewed the site-based grievance mechanisms for community members at our Cadia, Paterson Province (Telfer and Havieron), Lihir, Red Chris and Brucejack sites, as well as the Group approach to handling community grievances for our Exploration projects.

The review considered the extent to which each mechanism met each of the UN Guiding Principles' 'effectiveness criteria' for non-judicial grievance mechanisms, which highlight that grievance mechanisms

should be legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning and based on engagement and dialogue. The review was undertaken by expert business and human rights advisory firm, Pillar Two. It included a desktop review of the site grievance procedures and interviews with each site and a member of the Explorations team to understand how each mechanism works in practice.

Strengths identified include the solid foundation that our Community Concerns, Complaints and Grievances Guideline (Guideline) provides for sites to develop their community grievance mechanisms, and various elements of individual site-level grievance mechanisms which support the reporting and resolution of grievances.

The review also identified a range of opportunities for improvement, including updating the Guideline to align it more closely with the UN Guiding Principles and to ensure site grievance mechanisms are utilising the Guideline. There are also opportunities for various sites to strengthen how they communicate information about their mechanisms to communities, update their grievance procedures to provide guidance on how to support vulnerable stakeholders to access their mechanisms, and increase consultation with community stakeholders on the design and performance of the mechanisms.

We will begin to address the recommendations from the review during FY23, including identifying required updated to relevant procedure documents and building the capacity of key staff responsible for managing and communicating these mechanisms.



# 4. Assessing the effectiveness of our approach

We consider an effective response to modern slavery is one where, through our policies, processes and other actions, we identify the modern slavery risks in our value chain (including emerging risks), mitigate those risks and respond appropriately to any identified instances of modern slavery or other labour exploitation issues that could lead to modern slavery.

Assessing the effectiveness of our actions to assess and address our modern slavery risks is an important element in helping us drive continuous improvements in our approach and supports our understanding of what is and is not working and why. However, there are complexities and challenges in assessing effectiveness in this area. For example, the often-hidden nature of modern slavery can make it difficult to accurately determine the full impact of actions and initiatives. We also understand that quantitative indicators used to measure effectiveness must be carefully interpreted. For example, although we may have high levels of compliance with modern slavery clauses in our supplier contracts, this does not necessarily reflect a change in practice of the suppliers below tier one, or an effective reduction in the prevalence of modern slavery overall.

The following outlines the range of ways we assess the effectiveness of our approach.

## **Assurance review and audit**

Our Human Rights Audit Protocol sets out the process for internal human rights assurance and independent human rights audits.

During FY22, we undertook an internal human rights assurance of our Red Chris site in Canada, which assessed the site's implementation of our Human Rights Policy. The review identified strong practices, including a focus on rights-holders, a well-documented procedure

for community grievances and a clear process for onboarding local suppliers. Opportunities for improvement include refining governance and accountability frameworks, and developing and delivering human rights training tailored to the local context.

We also undertook an internal Modern Slavery Act compliance and reporting audit of our 2021 Modern Slavery Statement. Recommendations included the development of a long-term modern slavery strategy and work plan (addressed as part of the development of our FY23-FY25 Human Rights Action Plan) and development of a plan for managing potential instances of modern slavery in our supply chain (which is planned to be addressed in FY23).

We also engaged an independent third party, Ndevr Environmental, to conduct an audit of our corporate-level human rights maturity and governance, systems and controls. The audit found that our governance and policy commitments are mature, although there is room to continue strengthening them. The audit made recommendations regarding building understanding and engagement with key business partners, such as strategic investments, in relation to modern slavery risk management; linking human rights including modern slavery initiatives to executive incentives; more tailored training about modern slavery for relevant employees; and reviewing how human rights are integrated into our enterprise risk management system. Our FY23-FY25 Human Rights Action Plan seeks to address these recommendations.

## **Human rights training**

We track the number of people who complete our human rights training. Participants also complete a quiz at the end of the training to indicate their understanding of the content and gather feedback.

## Grievance mechanisms

We monitor and review complaints raised in accordance with our Speak Out Policy and site-level grievance mechanisms to identify any systemic issues and opportunities to strengthen our approach. Internal audits are also conducted in relation to the management of Speak Outs in accordance with our Speak Out Policy and Investigation Standard, most recently during FY20.

In FY21, we set ourselves a target for FY22 to formally respond to all community grievances raised through our site-level grievance mechanisms within 30 days, which we achieved.

In FY22, we engaged a third party to review our site-level community grievance mechanisms against the UN Guiding Principles' effectiveness criteria for non-judicial grievance mechanisms. We intend to do the same in relation to Speak Out in FY23.

## Supplier due diligence

Our Procurement function tracks key data from our supplier due diligence activities to confirm the implementation of our processes. This includes the number of suppliers: assessed as high risk; that complete an SSQ; and that are followed up for additional information. We maintain an open dialogue with our suppliers and engage them to discuss any concerns that arise.

We recognise that certain key performance indicators can potentially increase human rights (including modern slavery) risks, for example, those that focus heavily on procurement cost reductions. Our procurement team recognises that a range of risk management factors, including human rights risks, must be appropriately considered as part of our supplier evaluation and selection process before cost savings are considered.

## Human Rights Steering Committee

Our Human Rights Steering Committee also helps us to assess the effectiveness of and drive continuous improvement in our modern slavery approach. In particular, the committee oversees, drives and monitors the implementation of our modern slavery actions during the year, which supports accountability for those actions and helps to identify and address implementation challenges as they arise.

## Reviewing our SSQ program

During the reporting period, we reviewed the effectiveness of the SSQ program by assessing the quality and maturity of our suppliers' responses. 76% of suppliers provided adequate responses; 14% did not meet our expectations (either their responses were weak or documentation was missing); and 10% provided insufficient responses. Our plan is to further engage with the suppliers that did not meet our expectations to provide tailored feedback, reiterate our human rights expectations and links to additional information, including our human rights training video.

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"Assessing the effectiveness of our actions to assess and address our modern slavery risks is an important element in **helping us drive continuous improvements in our approach.**"





## 5. Consultation with owned and controlled entities

All of our owned and controlled entities operate under Newcrest's Group policies and processes, including in relation to human rights.

The development of this Statement was led by our cross-functional Steering Committee, with inputs being provided by Social Performance, Procurement, Legal, Risk and Compliance, Human Resources and Marketing.

In finalising this Statement, our internal consultation process involved writing to the Newcrest Directors of all the reporting entities covered by this Statement. We also contacted our other owned and controlled entities to ensure they are aware of our modern slavery related responsibilities and commitments and to provide a opportunity for their review of and input into the Statement. We also engaged with the General Managers of each site to seek input into the Statement.

## 6. Engagement and collaboration

We have a broad range of stakeholders reflecting the diversity of our operations, activities and industry. Our aim is to involve our stakeholders in decisions that affect them and to understand their points of view. To achieve this, we build and maintain open, inclusive and constructive relationships with our stakeholders.

We are members of the International Council of Mining and Metals, Minerals Council of Australia, Human Rights Energy and Resource Collaborative, and the World Gold Council. Each of these organisations' frameworks incorporates human rights expectations. We engage with peers and other stakeholders through these and other organisations to learn from their experiences in tackling modern slavery.

We will continue to identify opportunities for external engagement and collaboration concerning human rights, including modern slavery.

### **External feedback**

We engaged with a small number of civil society, investor and academia representatives who provided feedback on a draft of this Statement. We have incorporated several points of their feedback into both our modern slavery continuous improvement action plan and this Statement.





# 7. Looking forward

We are committed to building on our work to date to further embed our human rights policies and processes across the Group, and to continue strengthening our management of modern slavery risks.

In FY23, we intend to:

Continue building our **human rights due diligence** activities, including our understanding of the risks beyond our direct suppliers

- Targeted supply chain deep dive risk reviews: cleaning, chemicals, tyres and road transportation

Enhance the **integration** of our human rights (including modern slavery) approach across the business

- Convene the Human Rights Steering Committee
- Update human rights training

Improve the **effectiveness of our grievance mechanisms** and approach to investigating and remedying human rights (including modern slavery) incidents

- Review Speak Out Policy for effectiveness in line with the UN Guiding Principles
- Implement recommendations from our effectiveness review of our site-level grievance mechanisms
- Develop a Modern Slavery Response Plan



## APPENDIX 1:









# Progress against 2020 and 2021 commitments




### Our continuous improvement roadmap

The following roadmap shows our key actions over the last three years.

FY20	FY21	FY22
<ul style="list-style-type: none"> <li>Established our Modern Slavery Steering Committee</li> <li>Undertook a modern slavery risk assessment to identify key modern slavery risks in our operations and supply chains</li> <li>Modern slavery gap analysis to assess opportunities for strengthening current policies and processes to better assess and address our modern slavery risks</li> <li>Continued implementation of our Supplier Risk Framework, including additional due diligence on high-risk suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Updated our Human Rights Policy and Human Rights Audit and Performance Protocol for greater alignment with the UN Guiding Principles and Modern Slavery Act</li> <li>Strengthened our Supplier Performance Commitments concerning modern slavery</li> <li>Launched a human rights training program for key personnel</li> <li>Developed internal FAQs to raise employee awareness of human rights, including modern slavery</li> <li>Updated our standard supplier contract templates to include a right to audit our suppliers' compliance with applicable modern slavery laws</li> <li>Strengthened our due diligence process in relation to joint venture partners</li> <li>Conducted deep dive modern slavery risk reviews into our PPE and apparel, ocean freight and office cleaning supply chains</li> </ul>	<ul style="list-style-type: none"> <li>Strengthened the governance documentation suite for our supplier due diligence approach.</li> <li>Identified our salient human rights issues, which include labour rights (including modern slavery)</li> <li>Conducted a deep dive modern slavery risk review into solar panels, and Papua New Guinea-based suppliers, including labour hire, at Lihir</li> <li>Completed a review into the effectiveness of our site-level grievance mechanisms against the UN Guiding Principles on Business and Human Rights</li> <li>Undertook an independent third-party audit of our corporate-level human rights approach, including governance, systems and controls</li> </ul>

The following table sets out our progress against the commitments we made in our 2021 Modern Slavery Statement.

Commitment	Status as at date of this Statement	
Strengthen the governance documentation suite for our supplier due diligence approach (standard, procedure, guideline and training material for improving process execution)		In progress (see page 23)
Complete modern slavery deep dive risk reviews into local suppliers at Lihir (commenced during FY21) and third-party labour services at Lihir		Complete (see page 16)
Build awareness of modern slavery with key personnel at Lihir including in the Procurement function		In progress (see page 27)
Complete our first independent third-party human rights audit		Complete (see page 31)
Conduct a risk assessment on grievance management processes at each site to identify opportunities to strengthen processes		Complete (see page 30)
Continue our actions to raise awareness of our grievance mechanism with key stakeholders, including suppliers and workers in our supply chains		In progress (see page 29)
Reviewing our partners and JVs approaches to modern slavery risk management, including reviewing managed JVs' implementation of Newcrest's modern slavery risk management framework		Complete (see page 27)
Engage with key stakeholders on our 2022 Modern Slavery Statement		Complete (see page 34)

 Completed  In progress  Not commenced

## APPENDIX 2:

# Modern Slavery Act Mandatory Criteria Index

Modern Slavery Act mandatory criteria	References in this Statement
<b>Mandatory Criteria 1:</b> Identify the reporting entity	Disclosure Notes (see page 2)
<b>Mandatory Criteria 2:</b> Describe the structure, operations and supply chains of the reporting entity	Our structure, operations and supply chains (see page 6)
<b>Mandatory Criteria 3:</b> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Our modern slavery risks (see page 12)
<b>Mandatory Criteria 4:</b> Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Our approach to assessing and addressing our modern slavery risks (see page 19)
<b>Mandatory Criteria 5:</b> Describe how the reporting entity assesses the effectiveness of such actions	Assessing the effectiveness of our approach (see page 31)
<b>Mandatory Criteria 6:</b> Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation with owned and controlled entities, (see page 33)
<b>Mandatory Criteria 7:</b> Any other information that the reporting entity considers relevant	Engagement and collaboration (see page 34) Looking forward (see page 35)







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