



# Northern Star Resources Limited Modern Slavery Statement

11 February 2021

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# About this Statement

## What is modern slavery?

'Modern slavery' is an umbrella term used to describe serious exploitation and human rights violations. Practices that constitute modern slavery can include:<sup>1</sup>

- human trafficking;
- slavery;
- servitude;
- forced labour;
- deceptive recruiting for labour or services;
- debt bondage;
- forced marriage; and
- the worst forms of child labour.

The Global Slavery Index (2018) estimated that in 2018 around 40.3 million individuals are caught in modern slavery, with 71% of those being female, and 1 in 4 being children. It is understood 16 million modern slavery victims are exploited in private sector supply chains.<sup>2</sup>

Northern Star Resources Limited (**Northern Star** or the **Company**) condemns all human rights abuses, including modern slavery practices in all its forms. Modern slavery is a business risk for every industry and sector, which has severe consequences for victims. We recognise our role in protecting the human rights of all people involved in, or impacted by, our business practices. We take meaningful steps to identify and address our modern slavery risks, and maintain responsible and transparent supply chains.

## Annual Modern Slavery statements

Northern Star welcomed the Australian Government's introduction of the *Modern Slavery Act 2018* (Cth) (**Act**) which entered into force on 1 January 2019. The Act established a national modern slavery reporting obligation, applicable to organisations with annual consolidated revenue of A\$100 million or more.

As prescribed by the Act, this Statement sets out information on:

- the reporting entities covered by this Statement;
- our company structure, operations and supply chains;
- modern slavery risks in our operations and supply chains;
- the actions we have taken to assess and address those risks, including due diligence and remediation processes;
- how we assess the effectiveness of such actions;
- our process of consultation with our subsidiary entities; and
- other information that we consider relevant regarding our efforts to combat modern slavery in our operations and supply chains.

This Statement is available on our website at: <https://www.nsr ltd.com> as well as via the Australian Government's Online Register of Modern Slavery Statements at: <https://modernslaveryregister.gov.au>.

## Reporting entity & period

This Modern Slavery Statement (**Statement**) is the first mandatory modern slavery statement given by Northern Star under the Act, and is a joint statement of Northern Star on its own behalf and on behalf of its wholly-owned subsidiaries, under and in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) (**Act**).<sup>3</sup>

The Statement covers the financial year ended 30 June 2020 (**FY2020**).

Northern Star has also published:

- a voluntary modern slavery statement in its CY2018 Sustainability Report;
- an update on actions taken to address modern slavery risks in its CY2019 Sustainability Report; and
- simultaneous with the publication of this Statement, its CY2020 Sustainability Report which discloses further actions taken in the 6 months since the end of FY2020.<sup>4</sup>

These Reports are available here: <https://www.nsr ltd.com/investor-media/reports/annual-reports/>.

## Consultation with group entities

Northern Star developed this joint statement in consultation with each reporting entity covered by the Statement (which have common directors with Northern Star), in accordance with section 14(2)(c) of the Act.

Northern Star consulted with each reporting entity through our group-wide Procurement Social Responsibility Working Group (**Group**), which includes members of the legal, procurement and sustainability teams and meets regularly. The Group engaged with key areas of our business, including procurement, legal, risk management, sustainability, social responsibility and human resources to prepare this Statement. These teams operate across all sites for both Northern Star and all of its wholly-owned subsidiaries.

The consultation process involved assessment of modern slavery risks to the business and how they might vary across different sites, implementation of agreed actions to combat modern slavery risks (as detailed in this Statement), agreement on an action plan for the next reporting period, and review of the Statement text.

This consultation process has supported us to build a comprehensive, group-wide response to modern slavery currently led by the Procurement Social Responsibility Working Group.

## Board approval

This Statement has been approved for release by the Board of Northern Star on its own behalf and on behalf of its wholly-owned subsidiaries, and is current as at, 10 February 2021, in accordance with section 14(2)(d)(ii) of the Act.

<sup>1</sup> As defined in the *Modern Slavery Act 2018* (Cth).

<sup>2</sup> Australian Border Force Modern Slavery Key Facts and Figures.

<sup>3</sup> Northern Star Resources Limited, and each of the following of its wholly-owned subsidiaries, are 'reporting entities' for FY2020 for the purposes of the *Modern Slavery Act 2018* (Cth): Northern Star (Kawonwa) Pty Limited, Gilt-

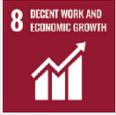
Edged Mining Pty Limited, Kundana Gold Pty Limited, Northern Star (HBJ) Pty Ltd, Northern Star (Holdings) Pty Ltd, Northern Star (South Kalgoorlie) Pty Ltd, and Northern Star (KLV) Pty Limited.

<sup>4</sup> Which will be addressed in greater detail in the Company's FY2021 Modern Slavery Statement, to be published before 31 December 2021.

# Highlights

## Prior to the reporting period

- Announced our alignment to the United Nations Sustainable Development Goals, which include:



**8.7** Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms



**16.2** End abuse, exploitation, trafficking and all forms of violence against and torture of children

- Established the Environmental, Social & Safety (ESS) Committee of the Board in July 2018, with delegated responsibility to identify modern slavery risks and oversee mitigating actions.
- Conducted our first modern slavery supplier survey.
- Released our first voluntary Modern Slavery Statement, which highlighted the results of our first modern slavery supplier survey.

## During the reporting period (covered in this Statement)

- Assessed the results of our 2019 modern slavery supplier survey and identified key risks to the business to be further evaluated.
- Adopted a Supplier Code of Conduct, including a commitment by our suppliers to undertake modern slavery due diligence.
- Trained key personnel to identify modern slavery risks.
- Identified opportunities to collaborate with suppliers to ensure our standards and expectations regarding advancement of human rights and reducing the risk of modern slavery in supply chains are met.

## Since the reporting period

- Adopted a KCGM Supplier Code of Conduct including a voluntary Modern Slavery Statement, together with our joint venture partner, Saracen Mineral Holdings Limited, for the Kalgoorlie Consolidated Gold Mines Ltd joint venture operations.
- Conducted 'deep dive' reviews of ~50 suppliers whose first modern slavery supplier survey responses raised risk flags.
- Promoted increased awareness of modern slavery with both our suppliers and our workforce.
- Conducted a second survey of all of suppliers (including KCGM) using the modern slavery supplier self-assessment questionnaire developed in collaboration with the Walk Free Foundation (SAQ).
- Published our CY2020 Sustainability Report, which summarises key findings from our second modern slavery supplier survey.

## Planned actions in CY2021

- Conduct a deep dive review of suppliers whose SAQ responses raised a high number of risk flags.
- Conduct an externally-facilitated on-site audit of major suppliers who raise the most significant risk flags in our latest survey.
- Train more employees to identify and take action to address modern slavery risks to our operations and supply chain.
- Review and update our procurement policies and processes to identify suppliers that present a modern slavery risk.
- Publish our second mandatory modern slavery statement, including trend data from our two supplier surveys to date.



# Modern slavery risks in our operations & supply chain

Northern Star does not discount the real possibility that instances of modern slavery could be present or occur in future in our supply chains, considering:

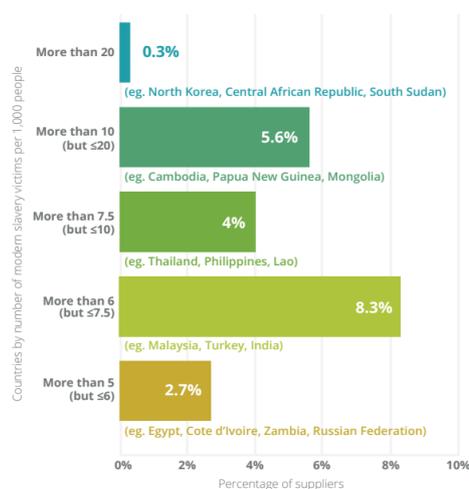
- the jurisdictions in which our operations and suppliers are located;
- the industries in which our suppliers operate; and
- the products which our business consumes.

## Country risk

An increased focus on environment, social and governance risk and performance has driven the Company's decision to operate exclusively in Tier-1 jurisdictions, which are ranked top four in terms of attractiveness for mining investment<sup>5</sup> and generally have the lowest rates of human rights abuses and modern slavery incidences.<sup>6</sup>

Despite these low risk rankings, Australia is not immune to modern slavery, with an estimated 15,000 people in modern slavery on any given day in 2016.<sup>7</sup> Commercial sexual exploitation of children, forced labour and labour exploitation, domestic servitude, forced sexual exploitation and trafficking persons for sexual exploitation, forced and child marriage, is known to have occurred in Australia in recent years.<sup>8</sup> Equally, the United States has an estimated prevalence of 1.3 per 1,000 people experiencing modern slavery in 2016, or approximately 403,000 in total.<sup>9</sup>

In our 2019 modern slavery supplier survey, we asked suppliers to self-select all countries in which their business operates. We benchmarked these responses against the Global Slavery Index in terms of prevalence of modern slavery victims (per 1,000 people),<sup>10</sup> the results of which are indicated in the chart below.



<sup>5</sup> Fraser Institute Investment Attractiveness Index (2020)

<sup>6</sup> Australia is ranked 5 and United States 10 (out of 167 countries) in terms of lowest prevalence of modern slavery in the Global Slavery Index (2018)

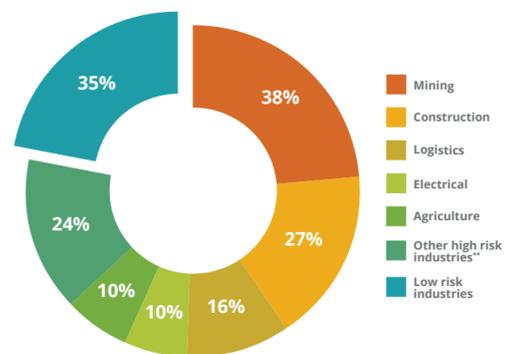
<sup>7</sup> Walk Free Foundation 2018 Global Slavery Index (2018)

<sup>8</sup> 'Murky Waters: A qualitative assessment of modern slavery in the Pacific Region' report by Walk Free Foundation, April 2020.

## Industry risk

Although modern slavery risks are considered to be greatest in sectors such as cleaning, hospitality, agriculture, textiles production and some types of manufacturing,<sup>11</sup> the mining industry and its various supply chains have been linked to modern slavery risks.

In our 2019 modern slavery supplier survey, we asked suppliers to self-select industries in which they operate out of the industries understood to present a significant risk of slavery and human trafficking,<sup>12</sup> the results of which are indicated in the chart below, with mining and construction being the largest proportion.



\*\* Other high risk industries' includes: fishing, forestry, healthcare, hospitality, cleaning and textiles.

## Product risk

The Global Slavery Index (2018) ranks the following products imported into the G20 as being at the highest risk of modern slavery (by US\$ value):

	1. Laptops, computers & mobile phones	US\$200.1B
	2. Garments	US\$127.7B
	3. Fish	US\$12.9B
	4. Cocoa	US\$3.6B
	5. Sugarcane	US\$2.1B

Northern Star considers the following categories of goods and services that we procure or that our suppliers procure to be potentially 'high risk' from a modern slavery perspective:

- transport and logistics (including ocean freight and warehousing);
- personal protective equipment (PPE) in particular, clothing;
- laptops, computers and mobile phones; and
- administrative and support services (such as facilities management services).

<sup>9</sup> Walk Free Foundation 2018 Global Slavery Index (2018)

<sup>10</sup> 'Strengthening Protections Against Trafficking in Persons in Federal and Corporate Supply Chains' report by Verité, January 2015

<sup>11</sup> Australian Border Force Modern Slavery Key Facts and Figures.

<sup>12</sup> 'Strengthening Protections Against Trafficking in Persons in Federal and Corporate Supply Chains' report by Verité, January 2015

# Action taken to address key modern slavery risks

Northern Star takes a multi-faceted approach to identifying and addressing modern slavery risks in our operations and supply chains, with a view to continually improving the integrity and quality of our supply chains.

## Policies and Procedures

The Northern Star Code of Conduct requires Directors, officers, employees and contractors to act fairly, honestly, transparently, with integrity and in compliance with all applicable laws and regulations in fulfilling their duties and responsibilities.

Our Supplier Code of Conduct adopted in 2020 (or in the case of suppliers to our KCGM Operations, the KCGM Supplier Code of Conduct<sup>13</sup>), mandates all individuals and organisations which supply goods or services to Northern Star to:

- confirm in their contract there is no deceptive recruiting, forced or bonded labour, employment of underage workers or underpayment of worker entitlements in their business;
- conduct their own annual supply chain enquiries to understand better the potential for risks of modern slavery breaches in their supply chain, and to identify any known or suspected modern slavery breaches in their supply chain;
- remediate any modern slavery breaches, if any are identified;
- respond in a transparent, honest manner to any request for information about its supply chain, and disclose to Northern Star the results of enquiries, upon request; and
- disclose to Northern Star any confirmed or suspected breaches of human rights in the Supplier's supply chain as soon as is practicable upon the Supplier becoming aware.

In addition, other Northern Star core corporate governance policies that address human rights matters apply to suppliers, including our:

- Anti-Bribery & Anti-Corruption Policy, which states the Company's committed opposition to all forms of bribery and corruption, prohibits the making of bribes and improper payments, and places appropriate controls on the giving and receiving of gifts and donations;
- Whistleblower Policy, which encourages reporting of material violations (or suspected material violations) of the Company's Code of Conduct, STARR Core Values or material legal or regulatory obligations; and
- Risk Management Policy, under which Northern Star commits to "ensuring the safety and wellbeing of all our employees and contractors".

These policies highlight the Company's commitment to acting lawfully, ethically and responsibly, instilling appropriate behaviours to foster the creation of long-term sustainable value, and further detail what the Company regards as acceptable business practices.

Our core corporate governance policies and procedures are available at <https://www.nsrld.com/about/corporate-governance/>.

## Risk management

Modern slavery risks are assessed within Northern Star's broader risk management framework, overseen by the Audit & Risk Committee.

Our General Counsel & Company Secretary would be the 'risk owner' for assessing modern slavery risks to our business, implementing agreed mitigating practices, devising future mitigation actions and reporting to the Audit & Risk Committee and ESS Committee on an ongoing basis, should modern slavery risks be included on the corporate risk register. Based on the supplier survey responses to date, modern slavery is not currently identified as a key risk comparative to other operational risks identified in Northern Star's business.

## Training

The following employees who have direct responsibility for procurement and supply chain management have completed the Anti-Slavery Australia course, conducted by the Faculty of Law at the University of Technology, Sydney, which is focused on helping build skills identify, assess and manage the risk of potential modern slavery practices infiltrating our supply chain:

- key procurement personnel in Australia and North America;
- our internal legal team;
- external relations and social responsibility manager;
- sustainability team; and
- relevant General Managers.

Members of the Procurement Social Responsibility Working Group have also attended externally run information sessions and industry working group meetings on modern slavery.

## Due diligence – new suppliers

As part of all tender processes and in on-boarding new suppliers, a prospective supplier is required to disclose their key occupational health & safety (OHS), environmental and other relevant standards and practices.

Our procurement team also specifically request details of a prospective supplier's approach to modern slavery risks in their business, on a discretionary basis. We are particularly concerned to ensure our approach to modern slavery is aligned with a particular supplier in tenders for significant contracts (meaning large annual value, long term or high risk).

Our standard purchase order terms and conditions for the supply of goods and services, including temporary personnel, are requirements communicated to our suppliers and available on our website.

<sup>13</sup> Northern Star provides the procurement function to KCGM and in doing so, implements the KCGM Supplier Code of Conduct for KCGM.

## Due diligence—existing suppliers

Northern Star periodically conducts surveys of all of its existing direct suppliers of goods and services,<sup>14</sup> to:

- identify any known or suspected modern slavery breaches in our supply chain, or particular risk areas; and
- understand what action is being taken by suppliers in relation to modern slavery risks or breaches.

Some insights from the results of our modern slavery supplier survey:

- in 2019 are disclosed in our 2018 Sustainability Report; and
- in 2020 are disclosed in our 2020 Sustainability Report.

Northern Star has not been made aware of any instances of modern slavery or other human rights violations through survey feedback.

Survey responses are analysed to identify ‘risk flags’ based on:

- the jurisdictions in which they operate – benchmarked against the Global Slavery Index;
- the industries in which they operate – benchmarked against industries identified as being ‘high risk’ in ‘Strengthening Protections Against Trafficking in Persons in Federal and Corporate Supply Chains’ report by Verité (2015); and
- what steps suppliers themselves are taking to address modern slavery risks to their businesses – eg. putting in place policies, training their workers, conducting due diligence on their supply chains and ensuring adequate and legal worker conditions.

Northern Star then conducts ‘deep dive’ reviews of suppliers whose survey responses raised the highest number of risk flags. We have also engaged external consultant to provide a due diligence report based on their global risk database on one such supplier with whom we have a substantial annual spend in order to check whether there were any documented human rights or other violations committed by, or adverse media relevant to, that supplier.

We analyse trends and track progress of our supplier base in taking steps to identify and address modern slavery risks over time.

## Collaboration with our suppliers

We endeavour to collaborate with our suppliers to promote and develop within our supply chain a deeper understanding of Northern Star’s expectations and standards in relation to human rights and the risks of modern slavery breaches.

As part of the ‘deep dive’ review of suppliers who modern slavery survey responses raised significant risk flags, we have requested:

- the CEO, Board and procurement department of these suppliers review and adhere to our Supplier Code of Conduct; and
- the procurement department and senior management of these suppliers complete training focused on identifying and managing modern slavery risks.

We take a collaborative approach with its supply chain, preferring alignment with suppliers and business partners who share Northern Star’s values, ethics and sustainable business practices – including their commitment to eradicating modern slavery.

## Collaboration with industry peers

Representatives of Northern Star attended the WA Modern Slavery collaborative (WAMSc) industry group<sup>15</sup> workshop in 2020 as an observer, and intends to monitor the group’s initiatives with a view to collaborating on further projects such as the modern slavery supplier self-assessment questionnaire which was designed by WAMSc in collaboration with the Walk Free Foundation.

Northern Star is also a member of various industry groups including the Gold Industry Group, and recognises the value of collaborating with our industry peers to share experiences, resources and build best practices in our approach to human rights and sustainable business practices more broadly.

<sup>14</sup> All suppliers who have issued invoices in the past 12 months

<sup>15</sup> Comprising representatives of AngloGold Ashanti, Fortescue Metals Group, Gold Fields, Iluka, Mineral Resources and South32

# Our response to COVID-19

The COVID-19 pandemic has had a profound effect on communities, individuals, businesses of all sizes in all places, and on the predictability of business continuity globally. Our priority continues to be: keeping our people safe and healthy, whilst maintaining operations, and commitments to our valued business partners.

Northern Star moved quickly with risk assessment, scenario planning and implementation of significant controls and requirements at all its sites to protect the health and safety of its workforce, their families, local suppliers and neighbouring communities. We are proud and fortunate that we experienced zero disruptions to our supply chains, made zero pay cuts and zero redundancies/lay offs/furloughs. We did not apply for or receive government assistance in the form of JobKeeper or similar support to employers.

Detailed disclosure on Northern Star’s COVID-19 response, including a timeline of our actions, are in pages 16 to 19 of our FY2020 Annual Report available at: <https://www.nsrld.com/investor-media/reports/annual-reports/>.

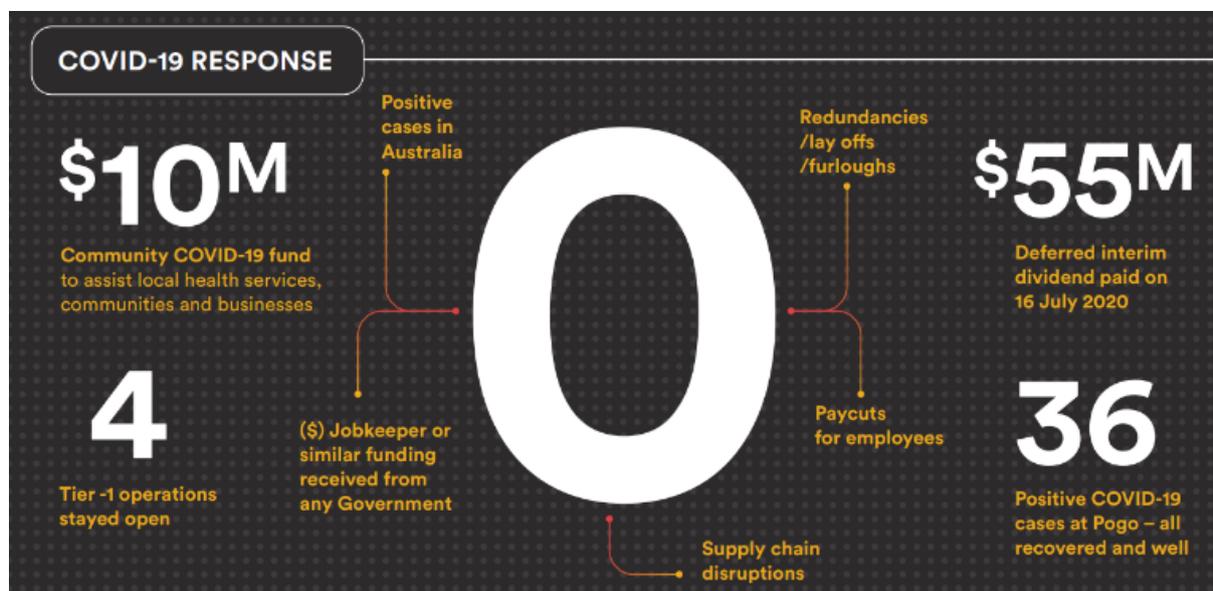
Key details are summarised in the infographic below.

We recognise that the vulnerability of workers to modern slavery and other forms of exploitation may have increased as a result of the COVID-19 pandemic, due to factory shutdowns, order cancellations, workforce reductions and sudden changes to supply chain structures.

In response to the increased risk of modern slavery practices brought about by the global COVID-19 pandemic, we have:

- brought forward our industry standard ‘SAQ’ second modern slavery supplier survey, to identify any suppliers which appear to be particularly ‘high risk’ to investigate further; and
- increased our due diligence on ethical and responsible sourcing of goods and services where there is a heightened risk, such as when procuring medical PPE for our workers and for donation as outlined in the case study which appears below.

As the COVID-19 pandemic continues, through 2021 we will continue to prioritise efforts to ensure the health, safety and wellbeing of our workers is maintained, and support provided to the communities in which we operate.



## Case study: Responsible sourcing of medical PPE for donation to Alaska

In response to the national shortage of medical personal protective equipment (PPE) in the United States reaching crisis point in early 2020 as COVID-19 cases in the country surged, Northern Star leveraged its procurement and logistics expertise to responsibly source and fly to the State of Alaska US\$1.5 million of donated medical gowns and masks for its public health workers.

**Scope and Technical Specification Development:** We engaged a well-regarded medical doctor from the General Emergency Medicine Department at Fairbanks Memorial Hospital, to advise which PPE items were required as a matter of priority for the State of Alaska's health system. The doctor also worked with us to ensure the PPE we sourced met all relevant technical requirements, including medical grade standards and approval from relevant certification agencies.

**Approval of Products:** All products supplied to Alaska were approved by the doctor we consulted. Information relating to both the manufacturer and product including multiple photo images of the specific product were sent to the doctor for review and approval prior to Northern Star placing the order.

**Quality Assurance:** The supplier provided a dedicated project manager to physically visit the manufacturing facilities and inspect the specific medical PPE stock that was to be purchased, prior to its shipment. This enabled a virtual inspection of the PPE stock and facilities they were sourced from, to be conducted by Northern Star's Procurement Projects Lead for every product category, via video conference.

**Selection of Suppliers:** We sourced quotations from a total of 3 suppliers who could supply appropriate PPE items. Of these, we selected a Chinese state-owned organisation which manufactured and supplied materials handling equipment to the global mining industry as our preferred supplier. This procurement decision was based on the following key considerations:

- **Market Intensity:** The PPE market was extremely heated, with global business and government procurement teams scrambling to quickly secure PPE from China as the key source for all global supply amid unprecedented demand. In particular, the medical PPE that met US and EU standards was in extremely high demand and limited to a narrow set of accredited suppliers.
- **State Owned Entity Strengths:**
  - Reputation and influence of a Chinese State-owned enterprise.
  - Ability to source and secure the required volume and type of PPE items.
  - Ability to prioritise supply (lead times were constantly being pushed out).
  - Insight to medical PPE export policy changes<sup>16</sup> including early insights.
  - Ability to secure and prioritise air-freight. Availability of air freight declined significantly over this time. We were also concerned about the potential delays in the delivery of the PPE, so it was critical to have the goods shipped from Asia directly to Alaska.
- **Proven credible option:** The supplier, engaged by other Australian mining peers, had a sound ethical and business reputation.

<sup>16</sup> Note that the policy changes occurred regularly during April to June 2020.

# Assessing the effectiveness of our actions

Northern Star recognises the importance of evaluating the effectiveness of all of the actions we take to combat modern slavery.

We have found the modern slavery supplier surveys to be an effective tool to identify potential risks in our supply chain that may not otherwise be apparent through our tendering and supplier onboarding processes. This has resulted in follow up with a number of suppliers deemed to be at high risk from a human rights perspective, to promote their understanding of modern slavery risks and encourage their key personnel to undertake online training programs.

We are also able to track performance through our complaints and grievance mechanisms that capture issues related to suppliers. We have not to date received whistleblower reports or other complaints relating to modern slavery or other human rights abuses at our operations or in our supply chain, however we continue to encourage our workers and business partners to do so should a concern ever arise. In any instances of issues raised with suppliers, we would work closely with the suppliers to fully, appropriately and quickly resolve issues within their workforce.

## Planned actions for the next reporting period

We are committed to continuous improvement in all aspects of our business operations and this extends to our commitment to take meaningful steps to identify and address our modern slavery risks, and maintain responsible and transparent supply chains.

Following implementation of Northern Star's merger with Saracen Mineral Holdings Limited on 12 February 2021, Northern Star will evaluate and refresh the Company's ESG strategy, including our approach to addressing modern slavery.

Notwithstanding this, in CY2021 Northern Star has committed to:

- Conduct a deep dive review of suppliers whose SAQ responses raised a high number of risk flags.

- Conduct an externally-facilitated on-site audit of major suppliers who raise the most significant risk flags in latest survey.
- Train more employees to identify and take action to address modern slavery risks to our operations and supply chain, including new procurement personnel.
- Review and update our procurement policies and processes to ensure they more accurately flag suppliers for training that present a high risk from a human rights perspective.
- Publish our second mandatory modern slavery statement, including trend data from our two supplier surveys to date.

We look forward to sharing our progress in the effectiveness of our efforts in the 2021 Modern Slavery Statement.

This Statement was approved by the Board of Directors of Northern Star Resources Limited on 10 February 2021, on behalf of the Company and its wholly-owned subsidiaries covered by this Statement.



**Bill Beament**  
Executive Chair  
Northern Star Resources Limited

10 February 2021

# Appendix: Mandatory criteria for modern slavery statements

For ease of review, the following table indicates in which section of the Statement each of the mandatory criteria for modern slavery statements under section 16(1) of the *Modern Slavery Act 2018* (Cth) is addressed:

Section	Criteria	Refer to Section of this Statement
14(2)(c)	The entity giving the statement must ensure that it is prepared in consultation with each reporting entity covered by the statement.	<a href="#">Consultation with group entities</a> on page 2
14(2)(d)	The entity giving the statement must ensure that it is approved by the principal governing body of: <ul style="list-style-type: none"> <li>(i) each reporting entity covered by the statement; or</li> <li>(ii) an entity (the higher entity) which is in a position, directly or indirectly, to influence or control each reporting entity covered by the statement, whether or not the higher entity is itself covered by the statement; or</li> <li>(iii) if it is not practicable to comply with subparagraph (i) or (ii)—at least one reporting entity covered by the statement.</li> </ul>	<a href="#">Board approval</a> on page 2
14(2)(e)	The entity giving the statement must ensure that it is signed by a responsible member of: <ul style="list-style-type: none"> <li>(i) if subparagraph (d)(i) applies—each reporting entity covered by the statement; or</li> <li>(ii) if subparagraph (d)(ii) applies—the higher entity; or</li> <li>(iii) if subparagraph (d)(iii) applies—each reporting entity to which the subparagraph applies.</li> </ul>	<a href="#">Signature</a> on page 10
16(1)(a)	Identify the reporting entity.	<a href="#">Reporting entity &amp; period</a> on page 2
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity.	<a href="#">Where we operate, Company structure and Our workforce and supply chain</a> on page 4
16(1)(c)	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.	<a href="#">Modern slavery risks in our operations &amp; supply chain</a> on page 5
16(1)(d)	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.	<a href="#">Action taken to address key modern slavery risks</a> on page 6
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions.	<a href="#">Assessing the effectiveness of our actions</a> on page 10
16(1)(f)	Describe the process of consultation with: <ul style="list-style-type: none"> <li>(i) any entities that the reporting entity owns or controls; and</li> <li>(ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.</li> </ul>	<a href="#">Consultation with group entities</a> on page 2
16(1)(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Other relevant information has been included throughout this Statement.
16(2)(a)	For a statement to be given under section 13 (modern slavery statements for single reporting entities)—details of approval by the principal governing body of the reporting entity	Not applicable
16(2)(b)	For a statement to be given under section 14 (joint modern slavery statements): <ul style="list-style-type: none"> <li>(i) details of approval by the relevant principal governing body or bodies; and</li> <li>(ii) if subparagraph 14(2)(d)(iii) applies—an explanation of why it is not practicable to comply with subparagraph 14(2)(d)(i) or (ii).</li> </ul>	<a href="#">Board approval</a> on page 2

For further information on Northern Star’s environmental social responsibility and governance performance, and other sustainable business practices, see our latest Sustainability Report via the Sustainability dropdown menu on our website at: [www.nsrld.com/sustainability/](http://www.nsrld.com/sustainability/).