



**NORTHERN STAR**  
RESOURCES LIMITED

# Modern Slavery Statement 2022



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# Modern slavery summary

## Committed to

### UN SDGs

in 2018, including SDG:



**8.7** Eradicate forced labour, end modern slavery and human trafficking, and by 2025 end child labour



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

## Established

### Environmental, Social & Safety Committee

in 2018, with delegated responsibility for ESG disclosures, including modern slavery reporting

## Established

### Modern Slavery Working Group

in 2019, comprised of members of procurement, legal and ESG engagement teams

## Adopted

### Supplier Code of Conduct & Purchasing Policy

in 2020, requiring suppliers to undertake modern slavery due diligence

## Adopted

### Human Rights Policy

in 2021, committing to the UN Universal Declaration of Human Rights

## Adopted

### Modern Slavery Response Protocol

in 2021, which provides for supplier audits, corrective action plans and remedial action trigger responses

## Conducted

### inherent risk assessment

on 1,183 Group suppliers, and sent to the 136 suppliers considered to have the high inherent risk an SAQ

## Conducted

### five on-site audits of suppliers

in FY22, with corrective action plans put in place and follow up audits conducted/scheduled

## Implemented

### modern slavery training across the business

mandatory for all personnel with a direct responsibility for procurement

# 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
- child labour.

The Global Slavery Index (2018) estimates that around 40.3 million individuals are caught in modern slavery, 71% of those being female and 1 in 4 being children. It is understood that 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, that has severe consequences for victims. It is also an investment issue, given its potential to undermine shareholder value. 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.

Our focus on environment, social and governance risk and performance drove the Company's decision to operate exclusively in the low sovereign risk jurisdictions of Western Australia and Alaska, which are now ranked number one and four in terms of overall attractiveness for mining investment.<sup>3</sup> Australia and the United States are also ranked within the top 10 for lowest rates of human rights abuses and modern slavery cases.<sup>4</sup>

Despite these low risk rankings, neither Australia nor the United States are immune to modern slavery. On any given day in 2016 it was estimated 15,000 people in Australia and 403,000 people in the United States were living in conditions of modern slavery.<sup>5</sup>

Although modern slavery risks are considered to be greatest in sectors such as cleaning, hospitality, agriculture, textiles production and some types of manufacturing,<sup>6</sup> the mining industry has an inherent risk of modern slavery, particularly due to the reliance on imported equipment and products.

## Modern Slavery Act

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

This Modern Slavery Statement (**Statement**) is our third mandatory modern slavery statement under the Act, and covers the financial year ended 30 June 2022 (**FY22**).

## This Statement

As prescribed by the Act, this Statement covers:

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

The [Appendix](#) on page 15 sets out where each requirement of the Act is addressed in this Statement.

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

<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> Fraser Institute Investment Attractiveness Index (2021).

<sup>4</sup> Australia is ranked 5 and United States 10 (out of 167) in the GSI.

<sup>5</sup> Walk Free Foundation 2018 Global Slavery Index (2018) (**GSI**).

<sup>6</sup> Australian Border Force Modern Slavery Key Facts and Figures.

## Consultation with Group entities

This Statement has been approved by the Northern Star Board and is current as at 28 August 2022. The Statement is a joint statement by Northern Star for itself and all of its wholly-owned subsidiaries (the reporting entity), in accordance with section 14(2)(d)(ii) of the Act.

Northern Star prepared this Statement in consultation with each other reporting entity that this Statement covers (all of which have common directors with Northern Star), in accordance with section 14(2)(c) of the Act. Consultation was undertaken by our Group-wide Modern Slavery Working Group, which comprises members of the procurement, legal and ESG engagement teams, who engaged with key areas of the business (including human resources, procurement and social performance). The Statement was reviewed, and recommended to the Board for approval, by the Environmental, Social & Safety (ESS) Committee of the Board.



**Michael Chaney AO**

Chairman, Northern Star Resources Limited

28 August 2022

# Who we are

## Our Company

Northern Star is one of the world's ten largest gold miners, with operating mines and exploration programs located in world class jurisdictions of Australia and Alaska<sup>7</sup>.

Our STARR Core Values are integral to the working lives of all our workers, across all of our operations, and form the foundation of everything we do as a business,

Our Purpose is: To generate superior returns for our shareholders, while providing positive benefits for our stakeholders, through operational effectiveness, exploration and active portfolio management.

Northern Star was incorporated in May 2000, and is a public company limited by shares listed on the Australian Securities Exchange (ASX: NST). See page 6 for the Northern Star group (**Group**) organisational structure at 30 June 2022.

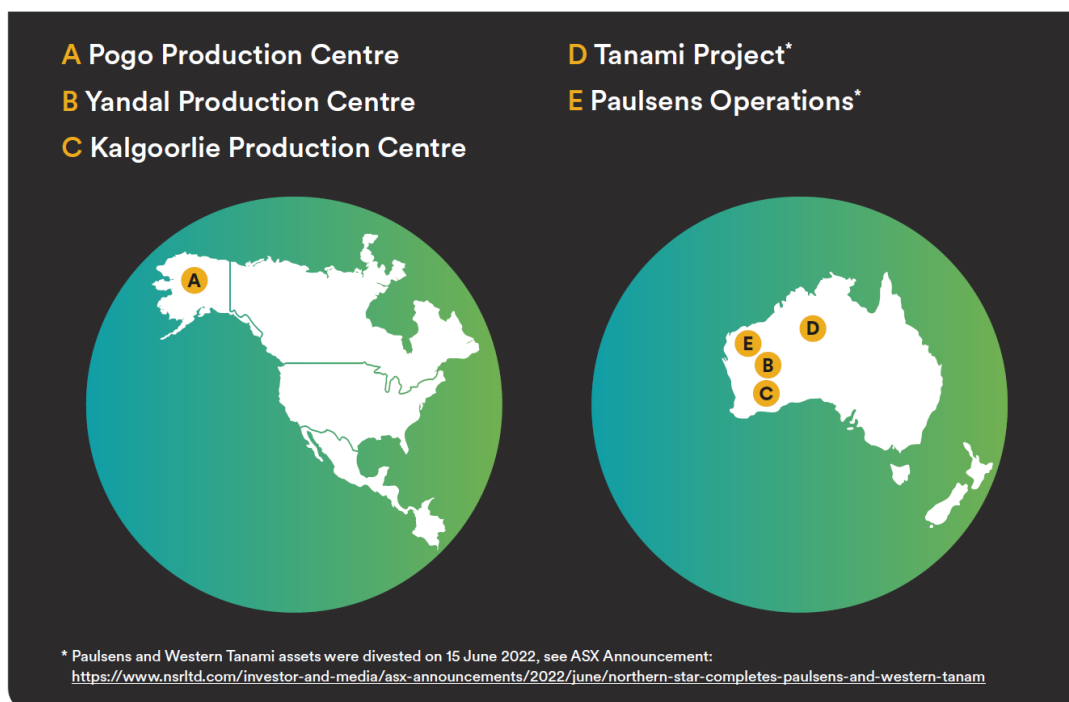
Figure 1 STARR Core Values:



## Where we operate

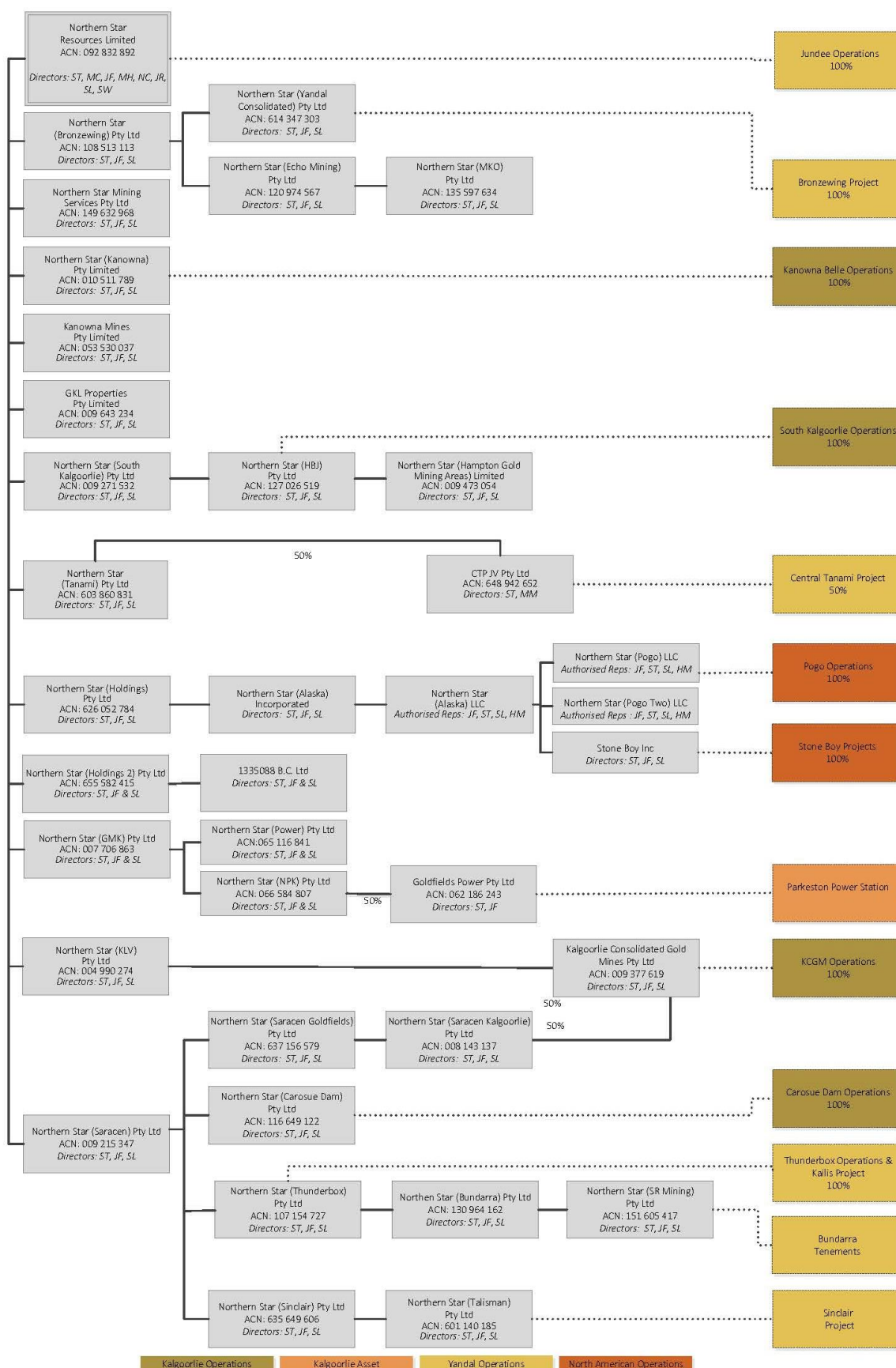
Northern Star owns and operates three high quality gold production centres: Kalgoorlie and Yandal in Western Australia, and Pogo in Alaska.

During FY22, the Company divested its Kundana, Paulsens and Western Tanami assets.



<sup>7</sup> Ranked #1 and #4 respectively in the Fraser Institute Investment Attractiveness Index (2021).

## Our corporate structure<sup>8</sup>



<sup>8</sup> As at 30 June 2022. In FY22, Northern Star completed the sale of its Kundana Assets to Evolution Mining Limited (including the shares in Kundana Gold Pty Ltd, Gilt-Edged Mining Pty Ltd and EKJV Management Pty Ltd) and the sale of its Paulsens and Western Tanami assets to Black Cat Syndicate Limited (including the shares in Northern Star (Western Tanami) Pty Limited). These subsidiaries are covered by this Statement to the extent they formed part of the Group during FY22.

## Our workforce

At end of FY22 our workforce comprised just over 6,000 workers, of which 3,400 were employees and 2,600 contractors. 93.4% of our employees are engaged on a permanent full-time basis, 2.7% on fixed term basis and 1.5% on casual contracts. In addition, we employed 326 graduate students and trainees, plus 73 apprentices in FY22.

Northern Star's female participation rate was 23.1% at 30 June 2022, which was above the previous year's percentage and the metal ore mining industry average<sup>9</sup>.

Geographically, we have:

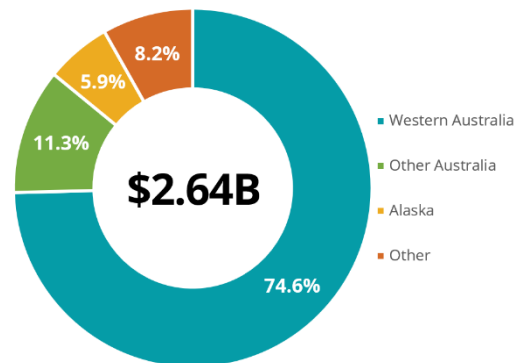
- 90% local employment in Kalgoorlie, Western Australia; and
- 60% local employment at our Pogo Operations in Alaska.

## Our supply chain

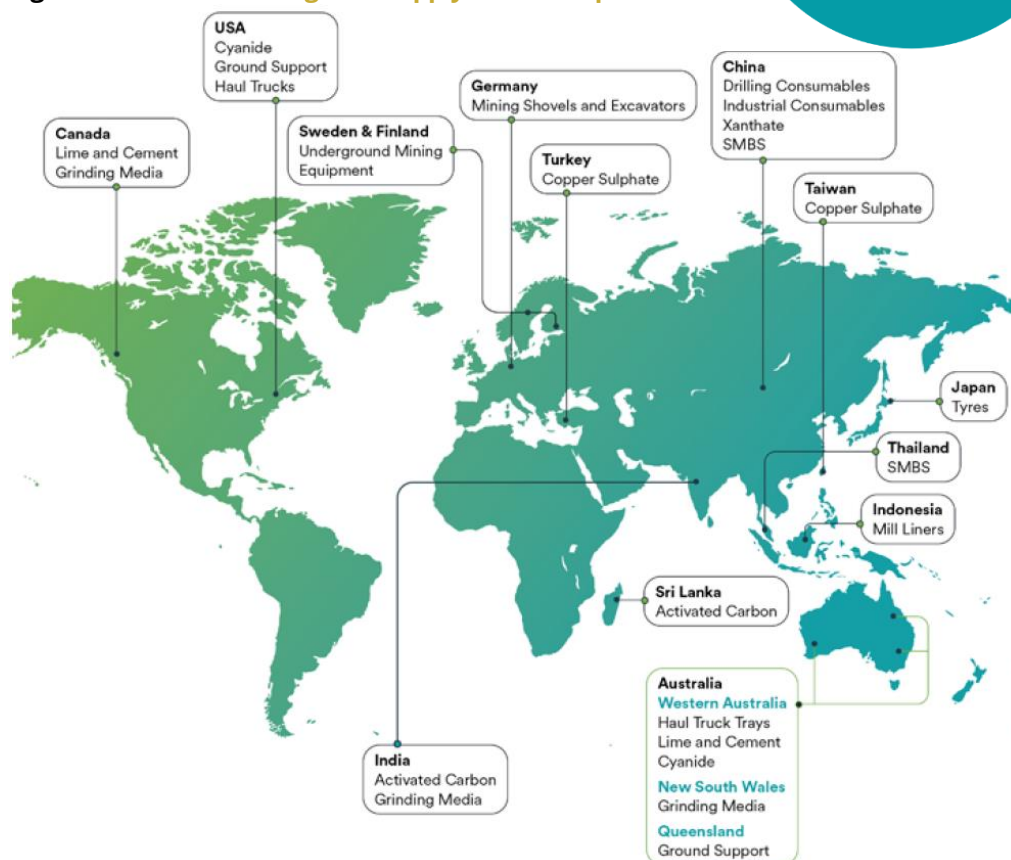
Northern Star's operations are supported by a centralised Group procurement team that coordinates a global supply chain of over 4,000 suppliers. We prioritise the use of local suppliers where possible, while ensuring our supply chain risks are mitigated through strong regional relationships and ongoing analysis of our sustainability goals.

We procure certain goods and services identified in the Global Slavery Index (2018) as potentially high risk of modern slavery, including personal protective equipment (PPE), transport and logistics (e.g. freight and warehousing), laptop computers and mobile phones, and facilities management (e.g. camps, cleaning).

**Figure 2 FY22 procurement spend by location**



**Figure 3 Northern Star's global supply chain sample**



<sup>9</sup> Compared with 20.7% Industry at 31 March 2021 (WGEA Metal Ore Mining with 100+ employees for 2020-2021)



# Modern slavery risks in our supply chain

## Risk assessment

Previously, Northern Star assessed its exposure to modern slavery risks in our operations and supply chains by benchmarking responses to our supplier self-assessment questionnaires (SAQ), as follows:

- **country risk** – location of supplier operations against prevalence of modern slavery victims per country (per 1,000 people) from the GSI<sup>10</sup>;
- **industry risk** – industries in which suppliers operate against industries identified as being ‘high risk’ of modern slavery;<sup>11</sup>
- **product risk** – goods and services they supply benchmarked against those ranked as having the highest risk of modern slavery from the GSI; and
- **inaction risk** – supplier inaction on modern slavery, such as the absence of policies, training and due diligence, or poor worker conditions.

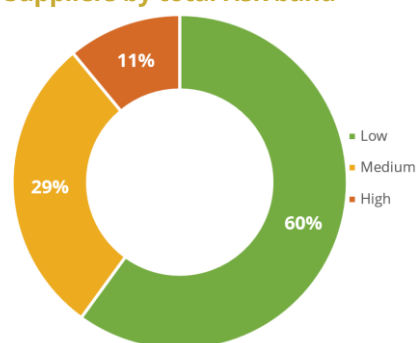
To enhance the reliability of how we assess modern slavery risks, in FY22 we engaged an expert external consultant in responsible sourcing and supply chain solutions<sup>12</sup> to conduct an inherent risk assessment on our supply chain. 1,183 Group suppliers were included in the inherent risk assessment, being all suppliers with annual spend over \$20,000 in the previous 12 months.

Assessment was conducted against the following pillars, with relative weightings appropriate to our risk profile:

- **country risk** – based on the World Bank Governance Indicators, UN Human Development Index, Transparency International Corruption Index and US State Department Human Trafficking Report (with appropriate weightings applied);
- **product risk** – based on business activities that may give rise to environmental and social risks and impacts associated with them, and the extent to which the supplier has technical or financial means to manage them (ranked according to statistical classification codes NACE Rev. 2); and
- **total spend** – to ensure additional scrutiny was placed on suppliers who make up a greater proportion of total Group procurement spend.

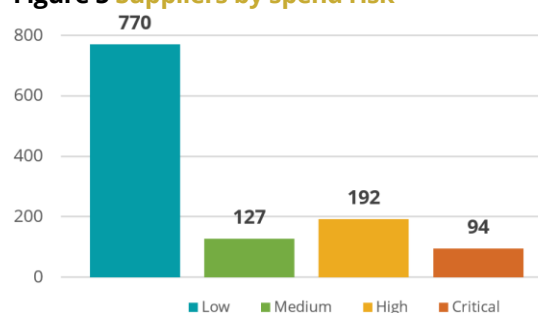
The chart below depicts the percentage of our suppliers assessed as having overall low, medium and high risk of modern slavery from our inherent risk assessment. We are undertaking further due diligence on the 11% (or 136) suppliers identified as high risk, in the form of SAQs (see page 10 below for further details).

**Figure 4 Suppliers by total risk band**

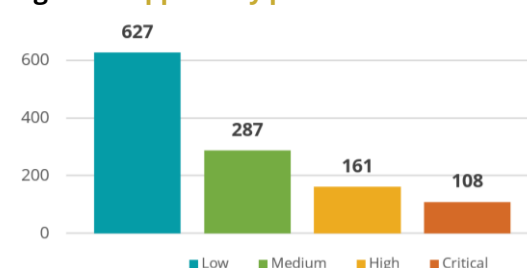


The country risk filter was applied based on where the supplier's product/service is procured (mainly Australia or Alaska, where known prevalence of modern slavery is relatively low), as we don't currently capture other location data.<sup>13</sup> As a result, country risk was generally low. Supplier spend and product risk is depicted below.

**Figure 5 Suppliers by spend risk**



**Figure 5 Suppliers by product risk**



<sup>10</sup> Walk Free Foundation 2018 Global Slavery Index (2018) (GSI).

<sup>11</sup> 'Strengthening Protections Against Trafficking in Persons in Federal and Corporate Supply Chains' report (Verité 2015).

<sup>12</sup> Social Accountability 8000 and WRAP accredited.

<sup>13</sup> Enhancing supplier data collection is a FY23 planned action (see page 14).

# Action taken to address risks

Northern Star takes a comprehensive, Group-wide and multi-faceted approach to identifying and addressing modern slavery risks led by the Modern Slavery Working Group, with a view to continually improving the integrity and quality of our operations and supply chains.

In FY22 we continued our focus on developing a deeper understanding of our suppliers and supply chain, including by expanding our data collection utilising a new online portal to map our supply base, screen for inherent risks, prioritise risks for selecting suppliers to audit, and managing the close out of corrective action plans put in place as a result of audit findings.

We take the following actions to ensure our standards and expectations regarding advancement of human rights and reducing modern slavery risks are met:

- policies and procedures that apply to our workers and all suppliers, aimed at preserving human rights;
- training programs, and promoting general awareness of modern slavery risks to our employees, contractors and suppliers;
- conducting supplier due diligence to identify high risks;
- undertaking audits to investigate potential modern slavery incidences;
- establishing, and ensuring the closeout of, corrective action plans where supplier audits reveal issues with working conditions; and
- collaboration with our peers, our suppliers and industry working groups,

as further detailed in the sections below.

## Policies and procedures

Northern Star's policies highlight the Company's commitment to acting lawfully, ethically and responsibly and define the Company's expectations of acceptable business practices. They are embedded and regularly reinforced to instil appropriate behaviours within our business and supply chain that foster the creation of long-term sustainable value for our shareholders.

The following policies together form a framework of standards required of our Directors, officers, employees and suppliers to ensure human rights are respected, and to identify and appropriately address risks and instances of modern slavery in our business operations and supply chain:

- **Human Rights Policy** – outlines the Company's commitment to be a responsible business and comply with the United Nations Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights.
- **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.
- **Supplier Code of Conduct\*** – requires all suppliers:
  - confirm there is no deceptive recruiting, forced labour, underage employment or underpayments in their business;
  - conduct their own supply chain due diligence to identify modern slavery risks and breaches;
  - disclose to Northern Star and remediate modern slavery breaches if identified; and
  - cooperate transparently with our supply chain due diligence enquiries and requested actions.
- **Purchasing Policy** – promotes transparent, equitable and competitive purchasing, taking into account environmental and social considerations in the overall value for money assessment.
- **Anti-Bribery & Anti-Corruption Policy** – prohibits the making of bribes and improper payments, and places appropriate controls on the giving and receiving of gifts and donations.
- **Whistleblower Policy** – requires reporting of actual or suspected material violations of the Code of Conduct, STARR Core Values or material legal or regulatory obligations.
- **Risk Management Policy** – sets out the framework of how we manage risk to ensure the safety and wellbeing of all our employees and contractors.

Copies of these policies are available on our website (at <https://www.nsrld.com/about/corporate-governance/>).

\*A material breach of our Code of Conduct or Supplier Code of Conduct constitutes an event of default, triggering a remedy process and potential termination of the supplier's engagement if the breach remains unremedied, under our Purchase Order Standard Terms and Conditions (available on our website at <https://www.nsrld.com/supplier-policies>).

## Training and awareness

We developed a bespoke modern slavery training module in collaboration with Anti-Slavery Australia, which is integrated into our online Learning Management System. The training helps to build skills to identify, assess and effectively manage the risk of modern slavery practices infiltrating our supply chain.

This training is available to all employees and contractors, and promoted throughout the year and on International Human Rights Day on 10 December.

Training is mandatory for all employees with a direct responsibility for procurement, supply chain management and human resources including:

- human resources personnel;
- procurement personnel including warehouse staff;
- relevant General Managers;
- sustainability team;
- our internal legal team;
- external and community relations teams; and
- key Executives, such as the Chief Financial Officer who oversees the Company's risk portfolio.

In FY22, 120 personnel completed the training module (and a further 26 personnel to 28 August 2022).

Our multidisciplinary in-house Modern Slavery Working Group oversees initiatives to tackle modern slavery in our business, including modern slavery training and awareness initiatives. Members of the Modern Slavery Working Group have also attended externally run information sessions and contributed to industry working group meetings on modern slavery in FY22.

## Risk management

Northern Star is committed to the adequate identification, monitoring and management of strategic risks presented by our operational and corporate activities. Modern slavery risks are assessed within Northern Star's broader risk management framework. Our framework is overseen by the Board of Directors, as supported by the Audit & Risk Committee and the Group Manager - Audit & Risk. See pages 36 to 39 of the FY22 Annual Report for details of how we continuously monitor, assess, review and manage risk, including our exposure to environmental and social risks.

The Environmental, Social & Safety Committee has oversight of how we assess and respond to modern slavery risks to the Company's business, including how we disclose our progress in mitigating those risks.

## Due diligence – new suppliers

As part of all tender processes, we require prospective suppliers to disclose key details of their occupational health & safety (OHS), environmental, social responsibility and other relevant practices. In addition, we may ask a prospective supplier to provide specific details on how they approach modern slavery risks, depending on the nature of the supply contract but always for significant contracts (meaning either high annual value, long term or high risk).

As part of the enhanced new supplier on-boarding process, suppliers must confirm compliance with both the Code of Conduct and Supplier Code of Conduct (summarised above on page 9), which reinforce our expectations with regards to safety, environment and social governance.

Enhancing new supplier ESG screening processes is a planned action for FY23 – for further details see the Planned actions for FY23 section on page 14.

## Due diligence – existing suppliers

Northern Star conducts due diligence on existing direct suppliers of goods and services, in order to:

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

We improved the way we conduct due diligence on our supply chain, from a blanket to a targeted approach.

In late FY22, we issued Self-Assessment Questionnaires (SAQs)<sup>14</sup> to the 136 suppliers who were considered to have a high modern slavery risk profile based on our inherent modern slavery risk assessment (see Risk assessment section on page 8). We have received and validated 75 responses so far. The data collected from both our inherent risk assessment, and the SAQ responses, will inform our FY23 audit plan.

See the Audits section on page 11 below for details of audits conducted in FY22.

<sup>14</sup> Developed by WAMSc (now known as the Human Rights Resources and Energy Collaborative) industry group in collaboration with the Walk Free Foundation.

## Audits and corrective action plans

In FY22, we developed and adopted a modern slavery response protocol (**protocol**) that:

- outlines the actions to be taken in responding to suspected or actual instances of modern slavery identified within our direct or indirect supply chain;
- includes template remediation actions relevant for various circumstances, such as:
  - inadequate workplace conditions;
  - unacceptable recruitment practices;
  - inadequate working or living conditions;
  - impossibility of leaving; and
  - penalties or threats; and
- is designed to complement specific corrective action plans put in place in response to issues identified during supplier audits.

In early FY22, we appointed an expert responsible sourcing and supply chain consultant to conduct third-party on-the-ground audits of identified high-risk suppliers within our supply chain. The consultant has certified auditors located in over 100 countries, enabling in-person audits to be conducted on our suppliers wherever they are based globally.

As disclosed in our FY21 Modern Slavery Statement, in July 2021 we selected three suppliers on whom to conduct audits, based on their FY21 SAQ responses, modern slavery due diligence reports and observations made during facility tours.

Two of the suppliers were based in Australia and audits were conducted virtually due to COVID-19 related travel restrictions in place at that time. One of the suppliers was based in India and three separate facilities in India were inspected in person by our appointed consultant. Workplace conditions assessment reports were prepared by the auditors, and corrective action plans were agreed with the relevant supplier to appropriately remediate the issues identified.

Ongoing monitoring and assistance have been provided to these suppliers, to ensure their continued improvements in conditions for their workers. See the Case Study on page 12 for details of the positive impact made with our supplier based in India.

Later in FY22, we completed another two supplier audits using our consultant's auditors, with COVID-19 restrictions preventing us from auditing a third supplier's facility in China until August 2022 when COVID-19 related travel restrictions were lifted.

One audit was performed against the Workplace Conditions Assessment (WCA) audit standard, and another against the SEDEX Members Ethical Trade Audits (SMETA) guidelines, before being converted to a

WCA audit standard for internal consistency. The SMETA alternative audit standard was applied in this case to accommodate the methodology already utilised by the supplier, to ensure internal consistency for them.

While these audits found no instances of modern slavery breaches, they nonetheless identified various areas for improvements including in management systems, worker health and safety, living wages and benefits, and working hours. In all cases, Corrective Action Plans have been put in place outlining timelines for remediation based on the severity of findings.

We also undertake follow-up audits, to ensure that all actions are closed out are an important aspect of remediating issues identified. In FY22 we completed the follow up audit for the SMETA audit referred to above, which confirmed all non-conformances identified had been closed out. One new minor non-conformance was identified, which is being addressed by the supplier and to be closed out with a further desktop audit review. Follow up audits with the other two suppliers are scheduled for early FY23. Ongoing monitoring and support will be provided, as we assist these suppliers to increase their modern slavery awareness and make improvements to their overall working conditions.

No contracts with suppliers were terminated in FY22 as a result of either inherent risk assessment or audits.

## Collaboration with our suppliers

We preference suppliers and business partners who share Northern Star's values, ethics and sustainable business practices – including a commitment to eradicating modern slavery. We collaborate with our suppliers to promote and develop within our supply chain a deeper understanding of Northern Star's standards in relation to human rights and modern slavery risks, through our corrective action plans and providing resources, training and support.

## Collaboration with industry peers

We collaborate with a number of organisations including peers and industry associations. We are part of the Human Rights Resources and Energy Collaborative (HRREC), previously referred to as the WA Modern Slavery collaborative (WAMSc). Northern Star is also a member of various industry groups including the Gold Industry Group. Our participation in industry associations is another avenue through which we collaborate on emerging issues and risks, including modern slavery. We do so by sharing experiences and resources, and building best practice approaches to human rights and sustainable business practices more broadly.



## Case study: Positively impacting our supply chain with audits

We utilise modern slavery audits to effect positive change in our supply chain, through corrective action and improvement plans that lift workplace condition standards, and that promote awareness on modern slavery risks, to the benefit of facility workers.

Through our modern slavery inherent risk review, an existing supplier was identified as a potential high risk for modern slavery based on key risk factors including geographical location, industry and spend. The supplier had also provided vague responses to our modern slavery self-assessment questionnaire (SAQ).

We engaged a third-party auditor to conduct a Workplace Conditions Assessment of the supplier, as part of our annual audit plan. In July 2021, on-site audits were conducted at three of the supplier's facilities located across India. One facility received an overall facility audit score of 60%, which is classified as low and ranks below the average global, country and industry audit scores. The audit identified a total of 23 findings of varying severity, which raised a number of red flags.

Notable audit findings included:

- no signed employment contracts for any interviewed employees;
- regular hourly work paid to employees did not meet minimum/agreed wages;
- employees were not given sufficient legally mandated time off;
- wages not being paid regularly or on time; and
- a fire alarm not installed at a facility.

We required the supplier to implement a corrective action plan and commit to timeframes to remediate the adverse findings (with major issues to be rectified within 30 days). In November 2021, a follow up on-site audit was conducted which verified most non-conformances had been rectified, resulting in a revised facility score of 95% which ranks well above the average global, country and industry scores.

Suppliers receive a copy of audit reports, to demonstrate modern slavery compliance to their other customers.

# Assessing effectiveness

Northern Star recognises the importance of evaluating the effectiveness of all the actions we take to ensure continuous improvement of our modern slavery management practices.

The main way we track effectiveness is through follow up audits confirming previous non-conformances have been duly addressed by suppliers, resulting in significant improvements in their workers' conditions.

We continually embed our focus on preserving human rights across the business, through our core corporate governance policies training and modern slavery training, as well as by reinforcing with our suppliers the expectations set out in our Supplier Code of Conduct.

By the end of FY22, we achieved the following commitments to improve our modern slavery approach, that we made in our FY21 Modern Slavery Statement:

- included greater detail on our risk profile based on our current supply chain;
- removed reliance on self-reporting from suppliers, by instead targeting high inherent risk suppliers and ensuring they participate in our SAQ (which responses are verified by our expert consultant);
- conducted on-site audits to identify and put in place corrective action plans to improve any inadequate working and living conditions; and
- reported on how we have effectively remediated issues identified in our supply chain.

We also track performance through our complaints and grievance mechanisms that capture all issues related to suppliers. In FY22 we did not receive any whistleblower reports or other complaints relating to actual or threatened 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.

If a whistleblower report is made in relation to a supplier, we would work closely with them to investigate the allegation made and where substantiated, we would assist them to fully, appropriately and quickly resolve issues within their workforce in accordance with our corrective action protocol.

We regularly seek out stakeholder feedback:

- from our employees through confidential culture surveys;
- from our suppliers mainly through their dealings with our purchasing and procurement teams; and
- through conversations with key investors on the Company's performance, both generally and on our sustainability and human rights commitments.

# Planned actions for FY23

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

Enhancing our supplier ESG data that we collect and maintain, both in relation to prospective suppliers (which is proposed to be a factor incorporated into the overall assessment) and existing suppliers, is a key focus for our Modern Slavery Working Group in FY23. We believe that having more detailed data, particularly around all jurisdictions in which a supplier operates and from which it sources goods and services, will allow us the ability to better assess potential exposure to modern slavery risks.

We will continue all current actions that we have in place to address modern slavery risks to our business and supply chain, such as modern slavery training,

reinforcement of our human rights related policies, risk management and risk register review processes, and assessing our supply chain annually with the SAQ.

In addition, as mentioned throughout this Statement, we also commit to:

- Follow up on outstanding corrective action plans to address and remediate the issues identified in all third-party audits we conducted, and work with those suppliers to achieve better workplace standards at their facilities; and
- Conduct further external on-site and desktop audits of high risk suppliers, identified out of both the inherent risk assessment conducted and SAQ responses received in FY22.

We look forward to sharing our future progress in our next FY23 Modern Slavery Statement, to be published in August 2023 (together with our FY23 Annual Report and FY23 Sustainability Report).

# Appendix:

## Mandatory criteria

This table outlines where sections 14(2) and 16(1) & (2) of the *Modern Slavery Act 2018* (Cth) disclosures appear in this Statement:

Section of Act	Criteria	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 4
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="#">Consultation with group entities</a> on page 4
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="#">About this Statement</a> on page 3
16(1)(a)	Identify the reporting entity.	<a href="#">This Statement</a> on page 3
16(1)(b)	Describe the structure, operations and supply chains of the reporting entity.	<a href="#">Who we are</a> on pages 5 to 7
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 supply chain</a> on page 8
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 risks</a> on page 9
16(1)(e)	Describe how the reporting entity assesses the effectiveness of such actions.	<a href="#">Assessing effectiveness</a> on page 13
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 4
16(1)(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	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="#">Consultation with group entities</a> on page 4

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/).





<https://www.nsr ltd.com/about/corporate-governance>