



**NORTHERN STAR**  
RESOURCES LTD

# Modern Slavery Statement

FY25



# FY25 Annual Reporting Suite

This Modern Slavery Statement (**Statement**) has been prepared by Northern Star Resources Ltd ABN 43 092 832 892 (**Northern Star**) to meet the requirements of the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2025 (**FY25**).

Unless expressly stated otherwise, all references to ‘our’, ‘we’, ‘us’, the Company or Northern Star refer to the Group, as detailed on pages 16 and 17 in Our Corporate Structure. Please refer to the Glossary for the definitions of the capitalised terms used in this Statement.

The percentage figures disclosed in this Statement are subject to rounding and may not add to 100%.

The full 2025 Annual Reporting Suite is available at [www.nsr ltd.com](http://www.nsr ltd.com)



[FY25 Annual Report](#)



[FY25 ESR Reporting Suite](#)



[FY25 Corporate Governance Statement](#)



[FY25 Modern Slavery Statement](#)

## Acknowledgement of Country

Northern Star would like to acknowledge and pay our respects to Traditional Owner groups, upon whose land in Australia we are privileged to work on.

- Darlot
- Kakarra
- Kariyarra
- Kariyarra Pirnthurruna
- Kultju
- Marlinyu Ghoorlie
- Ngarla
- Ngarluma
- Ngarluma (Mallina)
- Nyalpa Pirniku
- Nyamal
- Tjiwarl
- Wajarri Yamatji
- Warlpiri, Gurindji and Jaru
- Whadjuk Noongar
- the Wiluna Martu
- Yinhawangka

Northern Star would like to acknowledge and pay our respects to the Athabascan people, upon whose ancestral lands our Pogo Operation in Alaska, is situated.

We seek and value the guidance and input of these indigenous groups in the operation of our business. We acknowledge their strong and special physical and cultural connections to their ancestral lands and pay our respects to their Elders, past and present.

# Table of Contents

<b>Introduction</b>	<b>4</b>	<b>Modern Slavery Risks</b>	<b>24</b>
Highlights	4	Our modern slavery risks	24
Message from the Chair of the ESS Committee	4	<b>Action Taken to Address Risks</b>	<b>26</b>
<b>About this Statement</b>	<b>6</b>	Collaboration & engagement	26
This Statement	6	Training & awareness	27
Mandatory criteria	7	Risk identification and assessment	28
Consultation with Group entities	7	Supplier due diligence	30
Our progress	9	Case Study: Ongoing renewable energy supply chain assessment	33
<b>About Northern Star Resources Ltd</b>	<b>10</b>	Case Study: Supplier refusal to audit termination	34
Our Company	10	<b>Assessing Effectiveness</b>	<b>36</b>
Our Purpose	11	<b>Planned Actions for FY26</b>	<b>38</b>
Our STARR Core Values	11	<b>Glossary</b>	<b>40</b>
Our workforce	12		
Our Operations	13		
Our corporate structure	16		
Our supply chain	18		
<b>Modern Slavery Risk Management</b>	<b>20</b>		
Modern slavery risk	20		
Corporate governance	21		
Policies & frameworks	22		
Grievance mechanisms & remediation	23		



## Highlights

87%

of key accountable employees have completed awareness training.<sup>1</sup>

100% Completion

of our awareness training by the leadership team and all our Non-Executive Directors.

Tier 3

supplier SAQ pilot process completed. See case study page 33.

0

whistleblower reports related to modern slavery or other human rights abuses.

13

audits<sup>2</sup> completed on our Tier 1 suppliers' practices.

# Introduction

## Message from the Chair of the ESS Committee

I am pleased to present Northern Star's FY25 Modern Slavery Statement, which outlines our ongoing commitment to mitigating the risks of modern slavery across our Operations and supply chains.

We are proud of the progress we have made this year, including: conducting a comprehensive review of our supplier data and analysis processes, achieving a high compliance rate for our modern slavery awareness training among all required employees, and further strengthening our overall risk management approach to modern slavery.

In FY25, we focused on deepening our understanding of modern slavery risks within our supply chains. Notably, we continued a detailed assessment of Tier 2 and Tier 3 suppliers within the supply chain of our Tier 1 solar panel supplier, our FY24 case study. This year, we expanded our work to include a full Self-Assessment Questionnaire (SAQ) process for selected Tier 3 suppliers identified during our FY24 supply chain mapping project.

We collaborated closely with both Tier 1 and Tier 2 suppliers to uncover and address potential risks. Through this process, we gained valuable insights that we and our suppliers will apply across broader areas of our supply chain in the future.

While we did not identify any confirmed instances of modern slavery in FY25, we responded to a report concerning one of our suppliers potentially in breach of our Supplier Code of Conduct procedure regarding modern slavery. We

implemented our full modern slavery due diligence process and used this case to identify areas for improvement in our processes, which we plan to address in FY26. In an effort to try to ensure that human rights are not violated by suppliers in our supply chain, it is important to Northern Star to continue to try to engage with suppliers who attempt to disengage as a result of Modern Slavery concerns being raised with them.

We recognise that continuous improvement is essential to achieving meaningful and lasting impact. We remain supportive of the Australian Government's efforts to strengthen the Modern Slavery Act 2018 (Cth).

Looking ahead to FY26, we will prioritise improving supplier response rates to due diligence activities, enhancing the accuracy of risk identification through deeper supply chain analysis, and continuing to assess the effectiveness of our actions.



*Sally Langer*

**Sally Langer**

**Chair – Environmental, Social & Safety Committee**

Northern Star Resources Ltd  
20 August 2025

**Nadine Kupke - Dump Truck Operator**  
Thunderbox Operations  
Yandal Production Centre, Western Australia



<sup>1</sup> The total number of key accountable employees at 30 June 2025 is 368.

<sup>2</sup> Audits completed in FY25 were both initial supplier audits and follow-up audits of CAPs issued.



# About this Statement

### 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.

This Statement is available on our website at: [www.nsr ltd.com](http://www.nsr ltd.com) and via the Australian Government’s Online Register of Modern Slavery Statements at [www.modernslaveryregister.gov.au](http://www.modernslaveryregister.gov.au).

### Consultation with Group entities

This Statement has been approved for release by the Northern Star Board of Directors and is current as at 20 August 2025. 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 three 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 Legal, Company Secretarial and ESG Engagement teams, who engaged with key areas of the business (including human resources, procurement, and community).The Statement was approved by the Board following recommendations by the Environmental, Social & Safety (ESS) Committee.



*Stuart Tonkin*

**Stuart Tonkin**  
**Managing Director & CEO**  
Northern Star Resources Ltd  
20 August 2025

### Mandatory criteria

This table outlines where the mandatory reporting criteria required by the Act have been addressed in this Statement:

Criteria	Section of this Statement
Identify the reporting entity.	About this Statement page 6
	Our corporate structure pages 16-17
Describe the structure, operations, and supply chains of the reporting entity.	About Northern Star Resources Ltd pages 10-23
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.	Modern slavery risks pages 24-25
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.	Action taken to address risks pages 26-35
Describe how the reporting entity assesses the effectiveness of such actions.	Assessing effectiveness pages 36-37
Describe the process of consultation with any entities that the reporting entity owns or controls.	Consultation with Group entities page 7
Any other relevant information.	Introduction page 4
	Planned Actions for FY25 page 38

**Tim Smith - Principal - Environmental, Social & Corporate Governance**  
**Craig Winning - Geologist - Operations**  
Jundee Operations  
Yandal Production Centre, Western Australia





Pogo Gold Pour  
Pogo Operations  
Pogo Production Centre, Alaska

Our progress

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 mitigate modern slavery risks and maintain responsible and transparent supply chains.

Progress against the planned actions in FY25 committed to in our FY24 Statement is shown below:

- Complete

100% completion of our modern slavery awareness training by the leadership team and all our Non-Executive Directors.

See Training & awareness on page 27 for more detail.
- Complete

Audit at least four Tier 1 suppliers who are labour hire companies and long-term contractors providing services to Northern Star against governance aspects within the Supplier Code of Conduct and confirm progress against any corrective action plans issued.

See Audit and corrective action plans page 32.
- Complete

Refresh our Inherent Risk Assessment across all Tier 1 suppliers, to ensure the most up to date product and country risk profiles are considered.

See Inherent risk page 30 for more detail.
- Complete

Set goals for effectiveness, where applicable, and measure our performance against the key performance metrics detailed in Table 8.

See Table 8 page 37 for FY25 goals.
- Complete

Assess and enforce our Supplier Refusal to SAQ<sup>3</sup> Procedure in relation to continued non-responses or refusal to complete SAQs.

See SAQ page 31 for more detail.
- Complete

Utilising vendor management software to achieve enhanced assessment of ESG performance by our Tier 1 suppliers when awarding contracts via the tender process.

See Supply chain risk page 25 for more details.
- Complete

Complete supply chain mapping of our Tier 3 suppliers in the Jundee FY24 pilot assessment and investigate the modern slavery risk via a detailed SAQ process on a selection of ten of these suppliers.

See case study provided on page 33 for more detail.

<sup>3</sup> Supplier's own self-assessment questionnaire.



# About Northern Star Resources Ltd

[This section details Northern Star’s business, Operations and supply chains to provide context on potential interactions with modern slavery.](#)

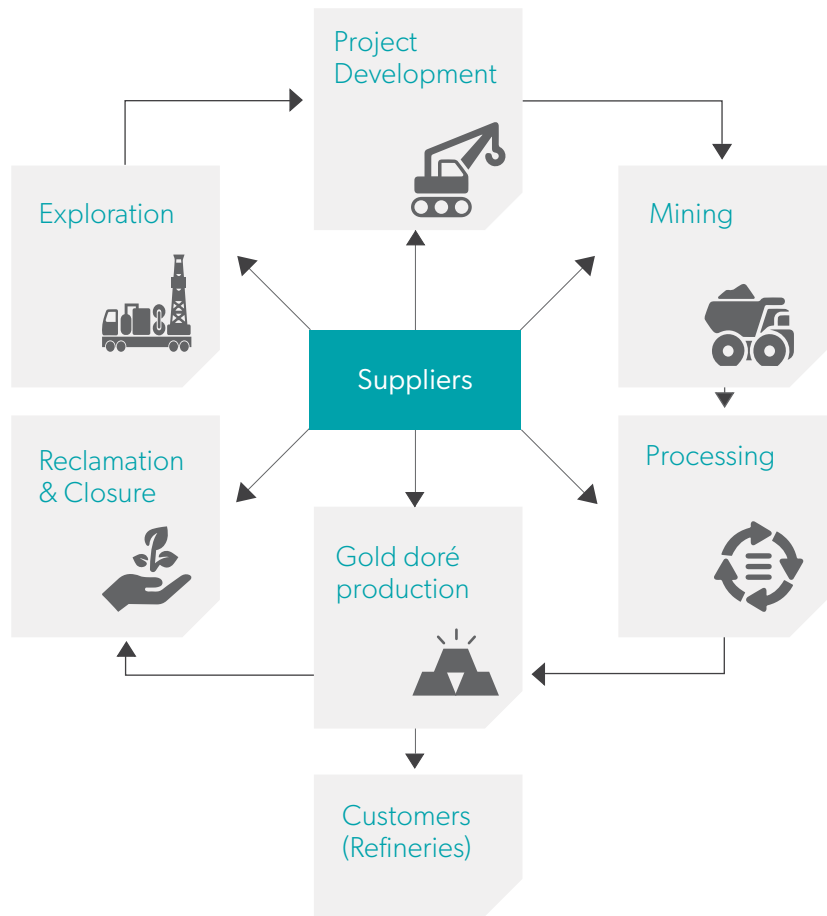
## Our Company

Northern Star is one of the world’s ten largest gold miners, with operating mines and exploration programs located in the two world class jurisdictions of Australia and Alaska in the United States of America. Northern Star operates three existing production centres and a development project in the Pilbara region of Western Australia (acquired on 5 May 2025 by Scheme of Arrangement with De Grey Mining Limited). Northern Star was incorporated in May 2000, and is a public Company limited by shares listed on the Australian Securities Exchange (ASX: NST).

Northern Star Resources Ltd is the parent Company for the Group. Full details of the organisational structure can be found on pages 16 and 17.

In our Operations we explore for, extract, process and sell gold, as illustrated below.

Figure 1 Northern Star’s Value Chain



## Our Purpose

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

## Our STARR Core Values

Our Core Values are integral to the working lives of all our workers and Operations.

**S** **AFETY**  
It matters and it starts with you

**T** **EAMWORK**  
Together we can

**A** **CCOUNTABILITY**  
The responsibility lies with you

**R** **ESPECT**  
To get it you must give it

**R** **ESULTS**  
We deliver on our promises



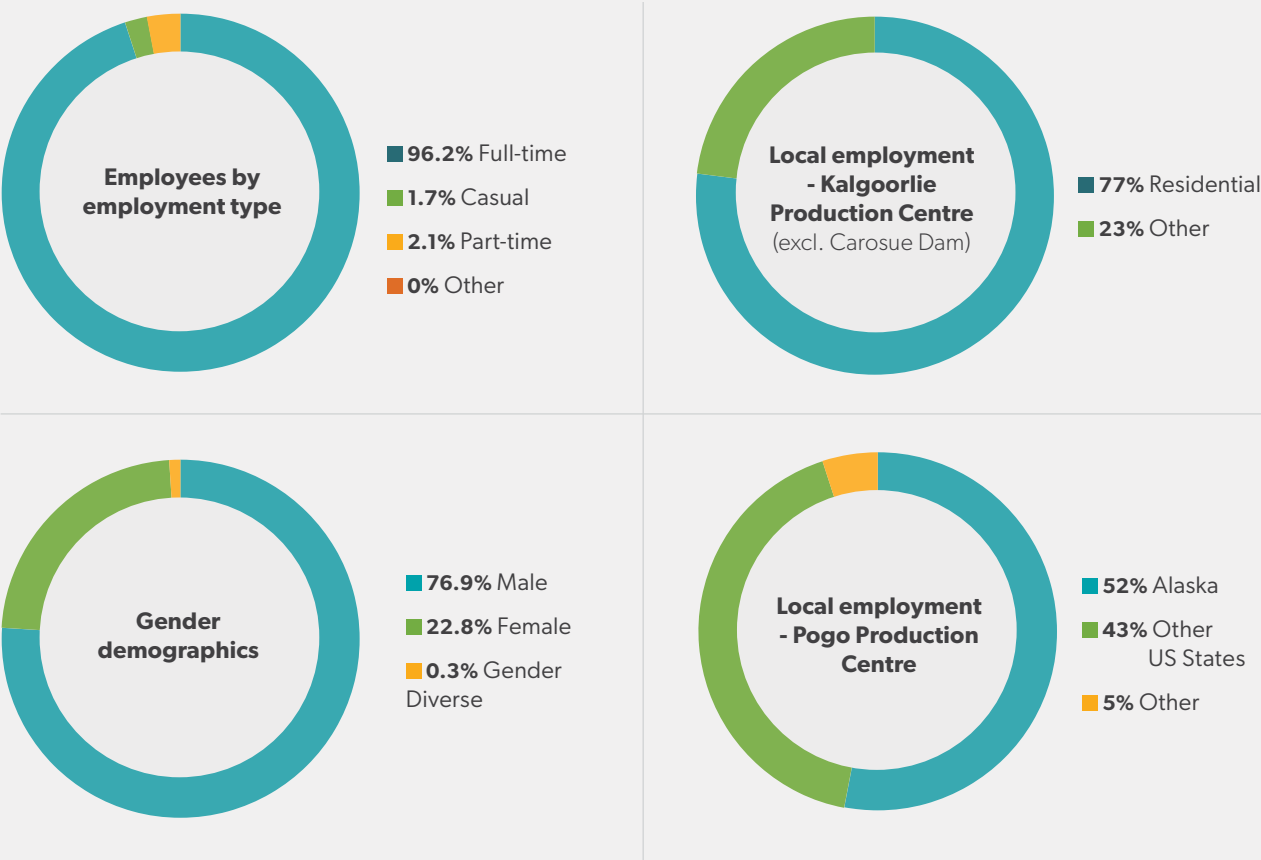
Our workforce

At 30 June 2025 our workforce comprised 8,728 workers, of which 4,744 were employees and 3,984 were contractors. Most of our workforce is employed on a permanent basis, with less than 1.7% engaged on casual contracts.

A detailed breakdown of our workforce information can be found in our [FY25 Environment & Social Responsibility - People & Culture Disclosure](#).

Ian McIntyre - All Round Operator  
Cheryl McIntyre - Dump Truck Operator  
Bronzewing Operations  
Yandal Production Centre, Western Australia

Figure 2 Northern Star Workforce Summary, as at 30 June 2025



Our Operations

Northern Star owns and operates three gold production centres: Kalgoorlie and Yandal in Western Australia and Pogo in Alaska, and the Hemi Development Project, located in the Pilbara region of Western Australia.

Figure 3 Worldwide Operations

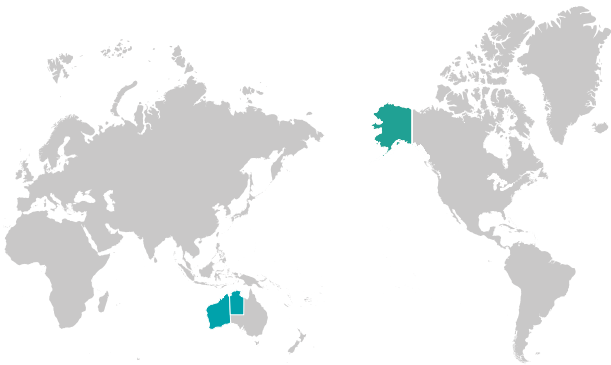
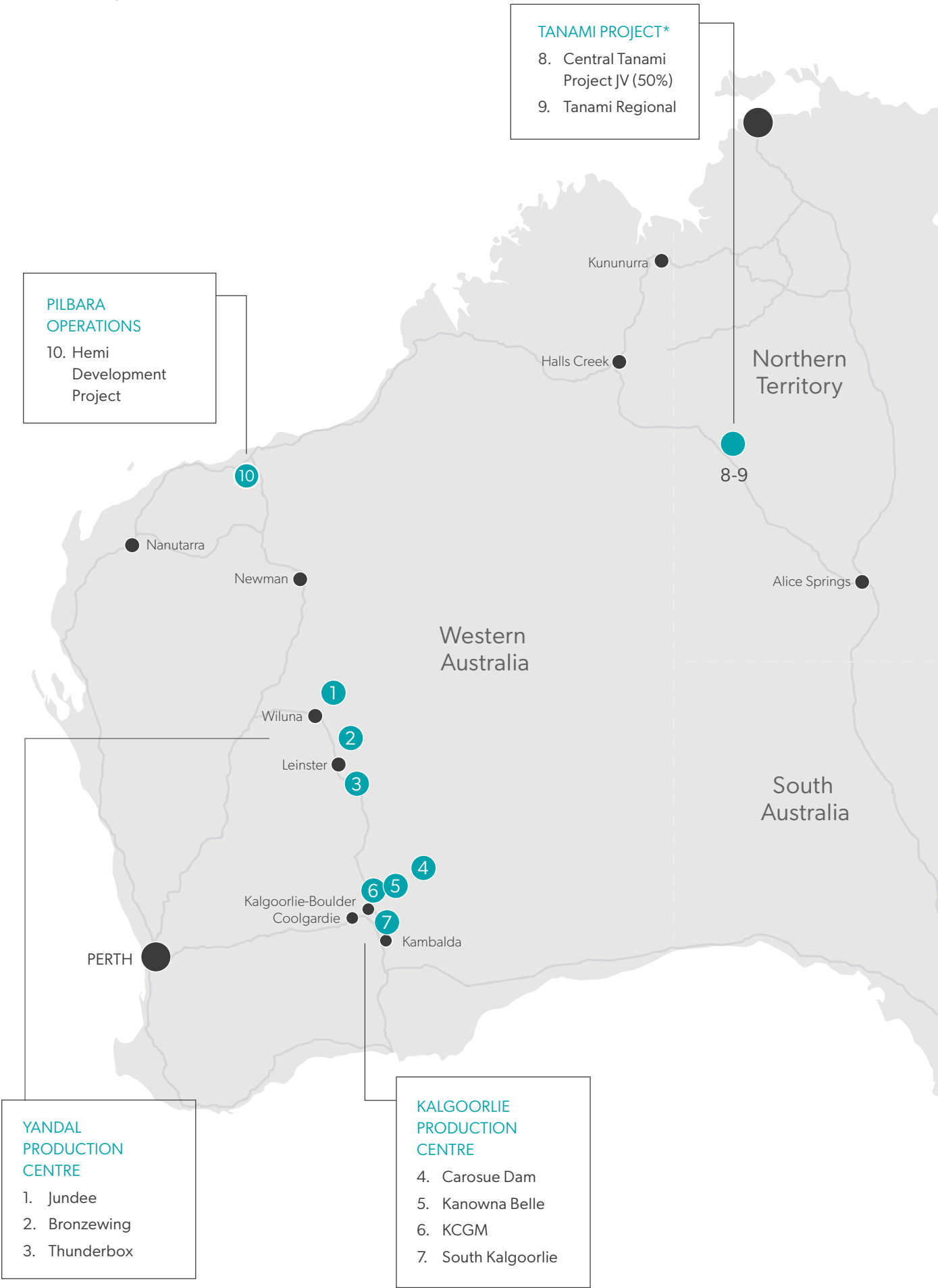


Figure 4 North American Operations



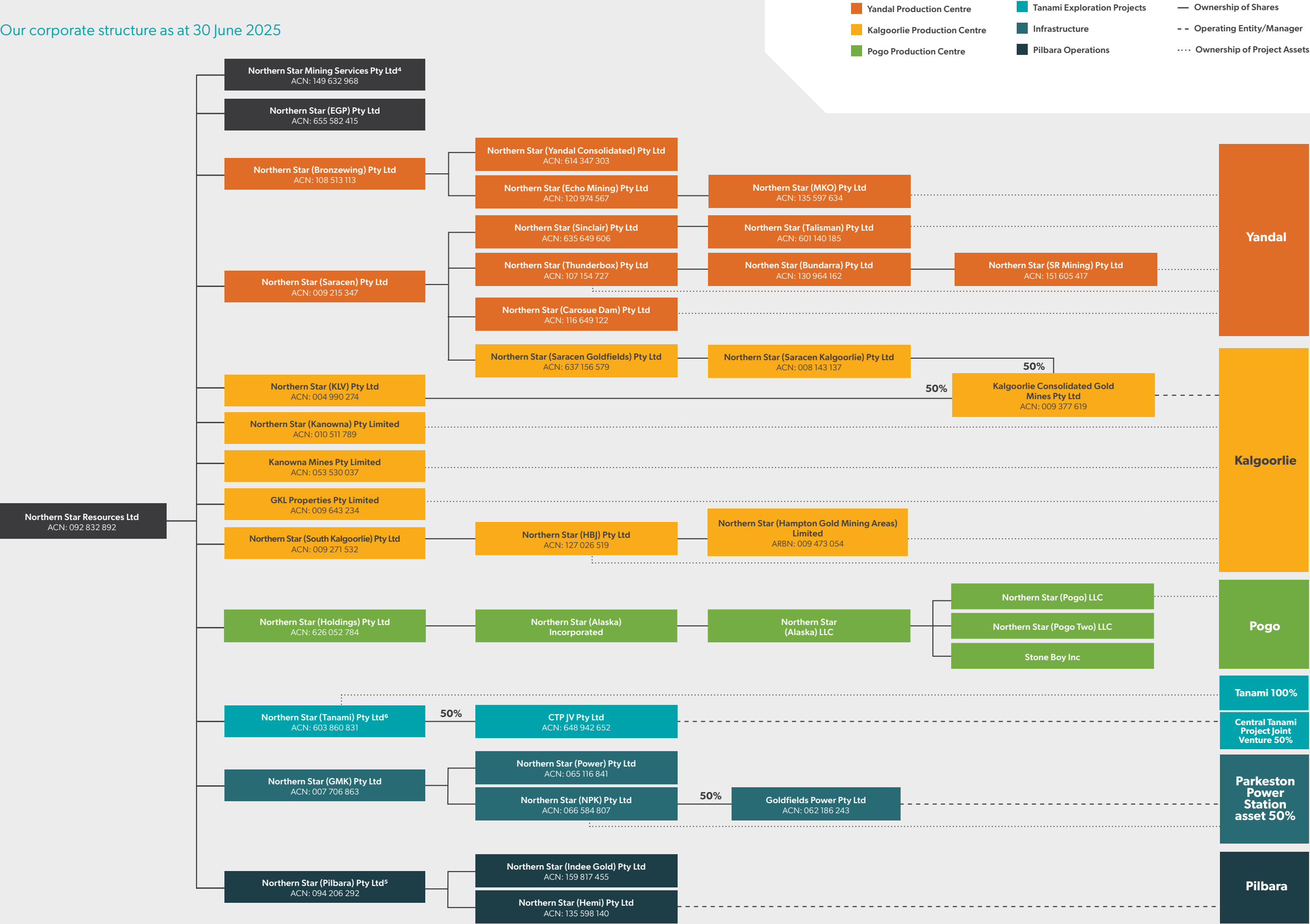
Figure 5 Australian Operations



\* Subject to a conditional sale agreement. See ASX Announcement dated 16 July 2025 at [www.nsrld.com](http://www.nsrld.com)



Our corporate structure as at 30 June 2025



<sup>4</sup> 1335088 BC Ltd voluntary dissolution 18 December 2024.

<sup>5</sup> Northern Star (Winterwhite) Pty Ltd, Northern Star (Domain Mining) Pty Ltd and Northern Star (Beyondie) Pty Ltd are in the process of voluntary deregistration.

<sup>6</sup> Subject to a conditional sale agreement, as announced on the ASX on 16 July 2025.



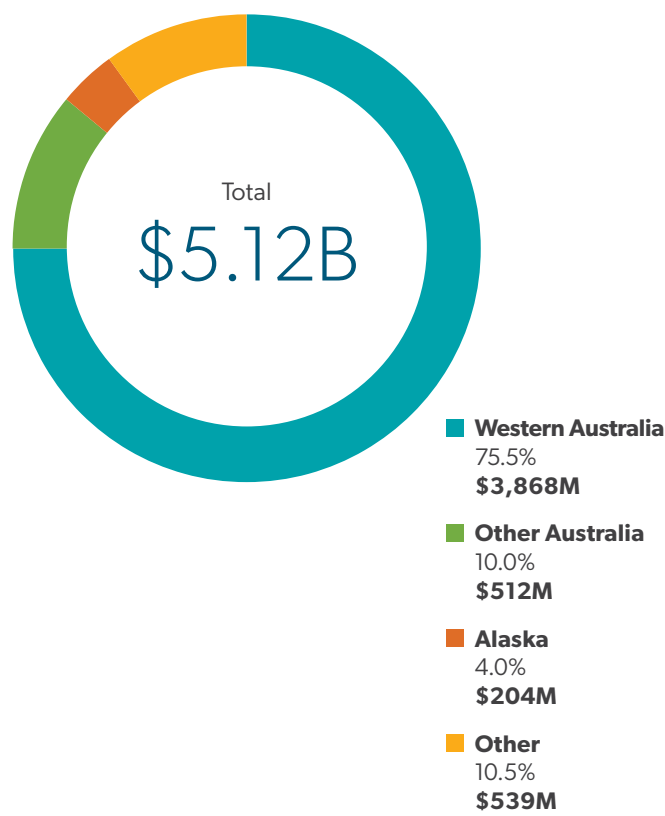
Our supply chain

Northern Star’s Operations are supported by a centralised Group procurement team that coordinates a global supply chain with 3,207 active<sup>7</sup> Tier 1 suppliers. We engage a network of Tier 1 suppliers both nationally and internationally with most of our Tier 1 suppliers located within Australia and the United States of America. In FY25, Northern Star spent a total of \$5.12 billion<sup>8</sup> with our Tier 1 suppliers. Of this spend, only 10.2% was in countries outside Australia.

We prioritise use of local suppliers where possible while ensuring our supply chain risks are mitigated through strong regional relationships and ongoing analysis of our supply chain. In FY25, \$929.6M representing 18% of total FY25 Group spend was to suppliers located locally to our Kalgoorlie, Yandal and Pogo Production Centres as well as our Pilbara Operations.

Northern Star is committed to partnering with suppliers who demonstrate alignment with the STARR Core Values of the Company. The procurement team remains focussed on reducing the number of Tier 1 suppliers where possible and appropriate, to improve efficiencies. A smaller number of suppliers assists in modern slavery due diligence processes, and further reduce this risk.

Figure 6 Supplier Spend by Location of Supplier

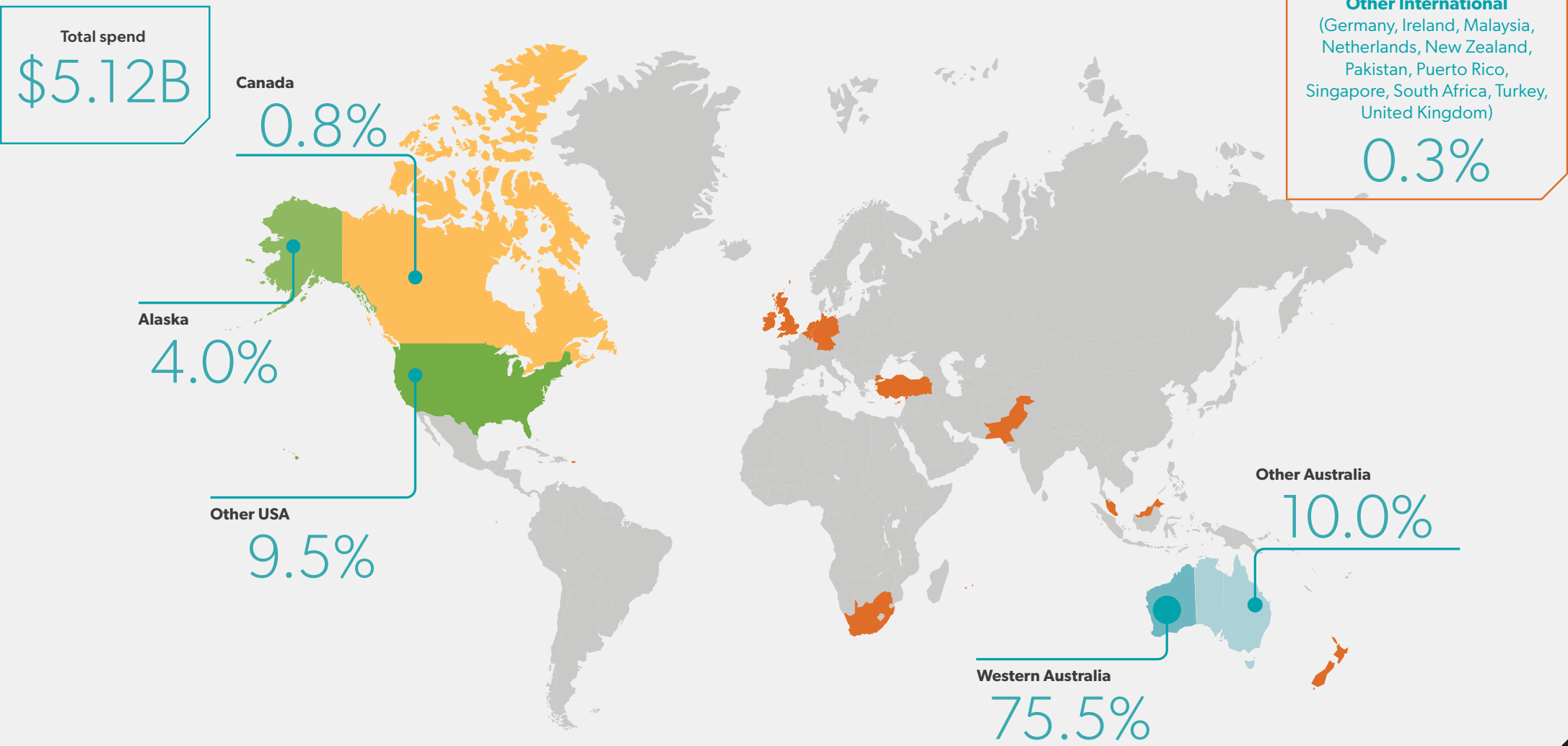


<sup>7</sup> Active suppliers, previously defined as those who have issued an invoice within the previous 24 months, has been aligned with our reporting suite and is defined as a supplier with any spend in the previous financial year only.

<sup>8</sup> Spend that is related to the provision of goods and services to Northern Star, under the direct influence and management of the procurement department. This excludes spend associated with matters such as royalties, taxes and employee salaries.



Figure 7 FY25 Procurement Spend by Supplier Location





# Modern Slavery Governance & Risk Management

This section provides an overview of Northern Star’s approach to modern slavery risk management practices.

Northern Star is committed to effective identification, monitoring and management of strategic risks presented by our operational and corporate activities. Our risk management activities are guided by Northern Star’s risk management framework, comprising a Risk Management Policy and Standard and an enterprise risk and assurance system.

The framework is aligned to ISO 31000 Risk Management Guidelines and provides a consistent approach to the assessment, management and reporting of risks across Northern Star.

The framework is overseen by the Audit & Risk Committee, which, as at 30 June 2025 comprised three of the Company’s independent Directors. Modern slavery risks are assessed within this risk framework and are subject to annual reviews by our Chief Financial Officer in leading the procurement and risk functions within Northern Star.

### Board oversight

Northern Star’s Board has standing sub- committees comprised of Non-Executive Directors that provide scrutiny and guidance on the oversight, monitoring, and review of modern slavery risk management, namely the Audit and Risk Committee (ARC), the Environmental, Social and Safety (ESS) Committee and the People and Culture Committee.

The ARC assists and makes recommendations to the Board in relation to the Company’s risk management framework, Risk Appetite Statement and the understanding of broad strategic risks to the Company achieving its strategic objectives. The ARC also monitors and reviews compliance with the Company’s Code of Conduct and Whistleblower Policy, which is part of our corporate governance framework for ensuring that human rights are respected across the Company.

The ESS Committee assists the Board in implementing the Company’s environmental, social and safety strategies and with the objective of ensuring that the Company conducts responsible and sustained business practices. In addition to overseeing the Modern Slavery Statement each year, the ESS Committee also has a standing 6-monthly action to review the progress of modern slavery due diligence practices, including SAQ and audit results.

The People and Culture Committee is responsible for assisting the Board in relation to the culture of the Company including initiatives and action plans to instil and embed the STARR Core Values (including Respect, a pillar of the UN Guiding principles in Business and Human Rights) across the business.

### Executive responsibility

Our Chief Financial Officer has executive responsibility for the procurement and risk functions, including managing human rights risks across the Operations, such as modern slavery risks. Our Chief Legal Officer and Company Secretary has executive responsibility for preparation of the Modern Slavery Statement and the Company’s Annual Reporting Suite available at [www.nsrld.com](http://www.nsrld.com)

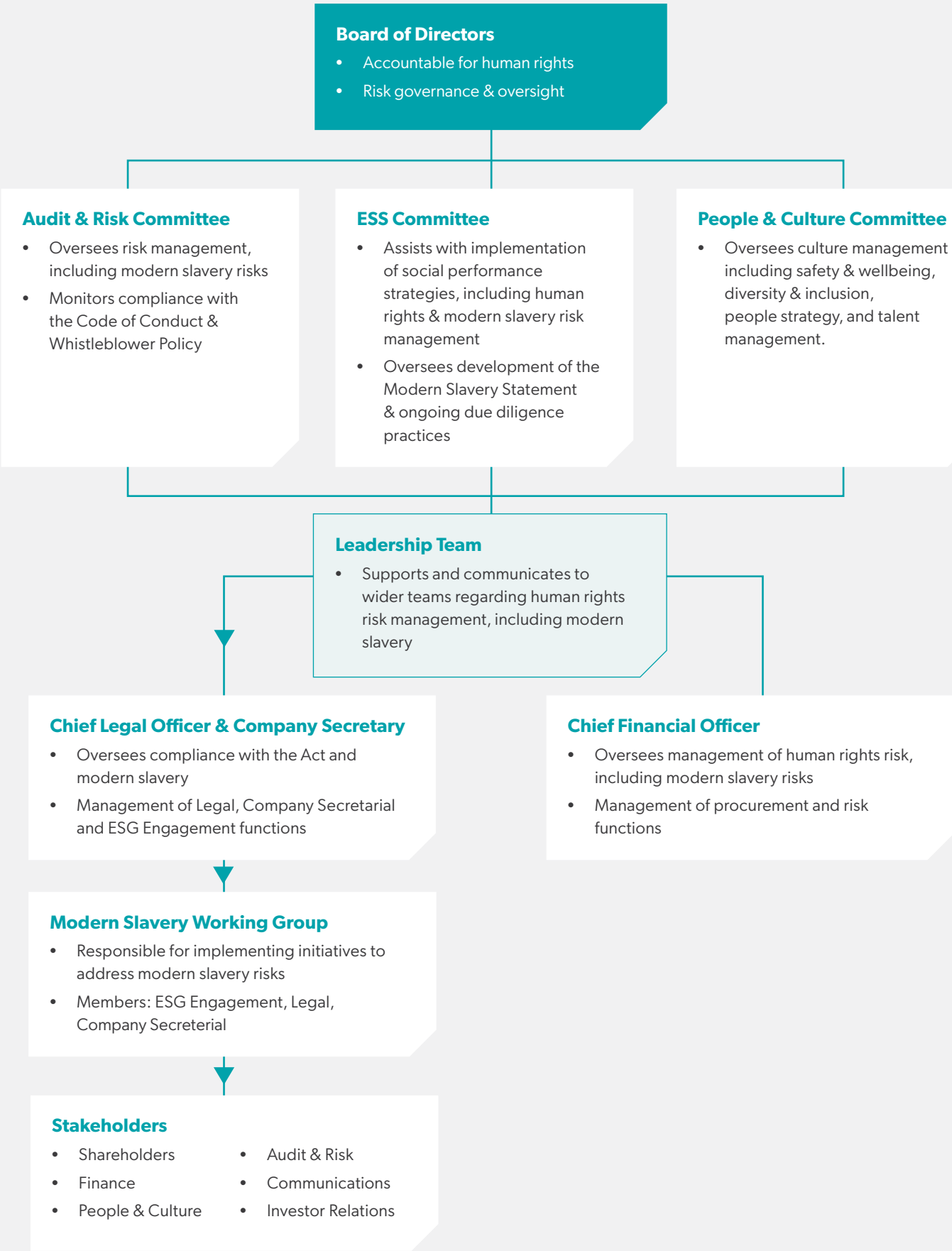
### Modern Slavery Working Group

Our internal Modern Slavery Working Group oversees the identification and assessment of modern slavery risks within our Operations and supply chains, and devises initiatives to address and mitigate these risks. This includes supplier due diligence practices, training and awareness initiatives, and effective data collection. The Modern Slavery Working Group comprises personnel from our Legal, Company Secretarial and ESG Engagement teams.

## Corporate governance

The Northern Star Board of Directors (Board) has ultimate responsibility for ensuring the appropriate processes are in place to assess, monitor, identify and manage any modern slavery risks to Northern Star’s business, as well as processes for remediating and reporting on suspected or actual instances of modern slavery.

Figure 8 Our Corporate Governance Framework





Policies & frameworks

Northern Star’s corporate governance policies provide the framework of standards required of our employees and suppliers, to ensure that across our Operations from the Board down, human rights are respected. Our Human Rights Policy together with the Code of Conduct form the basis for our approach to human rights management. Our

core corporate governance policies are annually reviewed and updated by the Board and the sub-committees of the Board to ensure any continual improvements including those related to Human Rights legislation are addressed. Employees are notified of these policies and refreshers via our online Learning Management System. They are required to complete training on any material policy updates.

Policy	Relevance to modern slavery	Communication & implementation
Human Rights Policy	The 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. It forms the basis for our approach to human rights risk management.	All employees and long-term contractors required to undergo our Company Induction are provided training on the Human Rights Policy during the employment onboarding process and every two years thereafter.
Code of Conduct	The Code of Conduct requires our employees and contractors to act fairly, honestly, transparently, with integrity and in compliance with all material applicable laws and regulations in fulfilling their duties and responsibilities.	All employees and long-term contractors required to undergo our Company Induction are provided training on the Code of Conduct during the employment onboarding process and every two years thereafter.
Supplier Code of Conduct	<p>The Supplier Code of Conduct sets out the expectations for our suppliers in relation to safety, environment, governance and business ethics, stakeholder engagement, human rights, and modern slavery.</p> <p>Northern Star will actively seek suppliers who partner with us in identifying and implementing a plan to remediate any modern slavery offences or risks of human slavery in the supplier’s supply chain.</p>	All suppliers can access the Supplier Code of Conduct via our website, alongside the purchase order standard terms and conditions.
Purchasing Policy	The Purchasing Policy promotes transparent, equitable and competitive purchasing practices, considering social considerations, such as modern slavery risk identification and management, in the overall value assessment.	All employees are provided training on the Purchasing Policy as part of their employment, refreshed every two years.
Whistleblower Policy	<p>The Whistleblower Policy allows for the reporting of actual or suspected cases of human rights abuse, including modern slavery, through a breach of the Code of Conduct.</p> <p>If a whistleblower report is made in relation to a supplier’s workforce, the allegation is investigated, and where substantiated, Northern Star would work with the supplier to ensure remediation occurs appropriately and promptly for the benefit of the workforce.</p>	All relevant employees and contractors are provided training on the Whistleblower Policy during the employment onboarding process and every two years thereafter.
Risk Management Policy	The Risk Management Policy frames how Northern Star manages and mitigates risks to our employees and contractors.	All employees and contractors are provided training on the Risk Management Policy during the employment onboarding process and every two years thereafter.

Grievance mechanisms

Northern Star’s Whistleblower Policy facilitates and encourages the reporting of material violations (or suspected violations) of the Company’s Code of Conduct including the STARR Core Values or material legal or regulatory obligations, including actual or suspected cases of modern slavery.

Everyone working for or engaged by Northern Star receives training on the Whistleblower Policy in the form of a Company-wide or site-specific induction. All employees are responsible for reporting actual or suspected material breaches of the Code of Conduct, under the Policy. All safeguards in terms of confidentiality, anonymity, ongoing support and protection in that Policy will apply in these circumstances where possible.

Reports made through the Whistleblower process are promptly investigated in an impartial and confidential manner, the results of which are reported direct to the Chair of the ARC and to the Board. The Board reviews the Whistleblower Policy annually.

Northern Star’s External Complaints and Grievance Management Standard Procedure describes how external parties can lodge a grievance which can be escalated into complaint for remediation and resolution where possible and will be available on our website soon.

Modern slavery investigation & remediation

Northern Star’s Modern Slavery Response Protocol (Protocol) guides our response and actions should modern slavery be identified in our Operations’ supply chain. The Protocol outlines the key steps to be taken in responding to suspected or actual instances of modern slavery and includes template corrective action plans for unacceptable recruitment practices, inadequate working conditions, and penalties or threats.

One instance of suspected modern slavery was reported to the Procurement Manager in FY25, however it could not be substantiated. See Case Study: Supplier refusal to audit termination on page 31 for more details.



Jennifer Elder-Green - Warehouse Officer  
Thunderbox Operations  
Yandal Production Centre, Western Australia



# Modern Slavery Risks

## Our modern slavery risks

We use the UN Guiding Principles on Business and Human Rights (UNGPs) and its continuum of involvement (cause, contribute, directly linked) to inform our understanding of exposure to modern slavery risks within our Operations and supply chain.

As the global standard for preventing and addressing human rights impacts associated with business activity, they provide a three-pillar framework (Protect, Respect, Remedy) for the protection of human rights. We acknowledge that as a business, Northern Star has a responsibility to respect human rights and that we are expected to conduct human rights due diligence which involves identifying, preventing, mitigating and accounting for adverse impacts. We acknowledge our role in taking action to prevent and mitigate adverse impacts where Northern Star is at risk of causing or contributing to them. Respect is the minimum standard. Northern Star also recognises its opportunity to support human rights through action. Engagement with our suppliers to identify and address human rights risks is an example of such action.

Cause	A company can cause modern slavery where its actions directly result in modern slavery occurring.	<b>Hypothetical example in the extractive industry</b> A company exploits workers at their mine site by withholding pay.
Contribute	A company can contribute to modern slavery where its actions or omissions facilitate or incentivise modern slavery.	<b>Hypothetical example in the extractive industry</b> A company negotiates excessively low rates with a labour hire supply company that can only be met if the labour hire company exploits employees.
Directly linked	A company may be directly linked to modern slavery through the activities of another entity it has a business relationship with. For example, a joint venture partner or supplier.	<b>Hypothetical example in the extractive industry</b> A company purchases mobile phones or computers from a supplier that were produced by a sub-supplier with cobalt sourced from mines using forced labour.

**Thunderbox Mining Operations**  
Thunderbox Operations  
Yandal Production Centre, Western Australia

## Operations risk

Our corporate office, mine sites, and exploration projects are exclusively located in Australia or Alaska in the United States of America. The prevalence of modern slavery in these jurisdictions is a relatively low risk, in part due to companies being subject to robust labour laws protecting employees from being exploited by employers. Despite this, the potential for instances of modern slavery in the gold mining industry within these countries still exists. For example, we could contribute to modern slavery at our Operations if we were to negotiate excessively low rates with a labour hire supply company. This could lead to the employees of the labour hire supply company receiving exploitative pay rates. Northern Star does not conduct this practice.

An example of how we could be directly linked to modern slavery at our Operations is if a camp services supplier were to utilise forced labour or debt bondage over its employees. Northern Star has not observed any conduct or obtained any information through its experience on site or in discussion with its camp services supplier to suggest otherwise.

Our Operations are subject to legislation, human resources policies, management practices and procedures that govern labour hire practices across our business. This compliance is supported by access to training and grievance mechanisms.

## Supply chain risk

Our highest exposure to modern slavery risks exists in our supply chain, through which we procure a variety of goods and services. Some countries have a higher prevalence of modern slavery and where our supply chain exists within such countries, Northern Star is at risk of modern slavery occurring within its supply chain.

Modern slavery can also result in supply chains if companies put commercial pressure on suppliers to such a level that the supplier exploits its workers by requiring long hours and low rates of pay.

As an example of how we could contribute to modern slavery within our supply chain is if we were to place impractical expectations on a supplier regarding delivery timeframes for particular goods, that could only be met by exploiting workers. Northern Star does not conduct this practice.

We could be directly linked to modern slavery if we were to source uniforms or personal protective equipment, such as gloves, from a supplier who uses forced labour, even if this occurred within our deeper supply chain. Northern Star's continuing efforts in identifying risks and the selection of Tier 1 suppliers to be audited is intended to ensure that this risk in our supply chain is mitigated. To date no suspected or actual instances of modern slavery have been identified.

Understanding where modern slavery risks may exist in our supply chain is imperative to being able to identify any actual instances of modern slavery. To better understand our supply chain, we conduct due diligence practices with support from an independent external consultant on our Tier 1 suppliers and select Tier 2 and Tier 3 suppliers.

Additionally, our process for onboarding Tier 1 suppliers includes the requirement for all Tier 1 suppliers to confirm compliance with our Supplier Code of Conduct which reinforces our expectations on our Tier 1 suppliers with regards to safety, environment, and social performance governance, including modern slavery.

In FY25 we enhanced our vendor management software to allow for a more comprehensive screening process and assessment of the ESG performance of our of our Tier 1 suppliers when awarding contracts. For more information see the Supply Chain Management at Northern Star section of our ESR suite on our website: [Supply Chain Management at Northern Star](#).



# Actions Taken to Address Risk

This section details the actions we have taken to mitigate modern slavery risks during the reporting period, and our proposed response to any instances of modern slavery identified within our Operations or supply chain.

Northern Star takes a comprehensive, Group-wide, and multi-faceted approach to identifying and addressing modern slavery risks. This action is led by the modern slavery Working Group, with a view to continually improve the integrity and quality of our Operations and supply chains.



**New Small Binning Warehouse**  
KCGM Operations  
Kalgoorlie Production Centre, Western Australia  
**Photo Credit: Peter Fisher -**  
**Warehouse Supervisor - Operational Readiness**

## Collaboration & engagement

We continued to collaborate and share information with a variety of stakeholders throughout FY25. The purpose of our collaboration is to gain insights from our stakeholders that will allow us to continue to develop our process and improve our responses to mitigate modern slavery risk.

### Industry associations

We participate in industry groups and other initiatives that encourage the sharing of knowledge and experience to aid in building best practice approaches including the Human Rights Resources and Energy Collaborative; and the Gold Industry Group. These National groups facilitate the sharing of knowledge and working together with other organisations within the extractives industry to develop best practice approaches to human rights.

### Industry expertise

We continue to utilise an independent expert consultant in responsible sourcing and supply chain solutions to assist us with assessing modern slavery risks within our supply chain, including completing SAQs and on-site audits. The role of this independent external consultant continues to be an integral stakeholder in our modern slavery risk management, and their expert knowledge helps inform the continual improvement of our supplier risk management processes.

### Suppliers

We work with our Tier 1 suppliers to promote and develop a deeper understanding of Northern Star’s standards in relation to human rights and modern slavery risks. This includes providing educational resources, training, or support; collaborating on bespoke human rights or modern slavery projects; and issuing corrective action plans following SAQs or audits. The case study on page 33 details a specific example of collaboration and engagement with our suppliers.

### Investors

We provide responses to ad hoc investor queries on our approach to assessing and addressing modern slavery risks within our business and supply chain as well as participating in ESG benchmarking surveys covering modern slavery and human rights management.

## Training & awareness

Modern slavery awareness training is mandatory for all employees with a direct link to areas of our operation which may encounter modern slavery or carry higher than usual risks of modern slavery (key accountable employees). Mandatory training of key accountable employees occurs across the whole of Northern Star Operations.

Our Managing Director, Non-Executive Directors and the leadership team are required to complete this training every four years as well as people in our Human Resources, Procurement, Environment, Legal and Company Secretarial teams. The range of key accountable employees is regularly reviewed to ensure that all appropriate employees receive the training. The training module is available to all employees and contractors on a voluntary basis and we regularly promote the availability of this training module to our employees on the intranet and communications network.

The online training module was developed in collaboration with Anti-Slavery Australia, a specialist legal practice, research and policy centre committed to the abolition of modern slavery in Australia. The training comprises an introduction to modern slavery and the Act together with actions Northern Star is taking to address modern slavery risks. The training also details expectations for employees and where to seek additional information or guidance. Quiz questions are embedded throughout the training to test understanding of the content.

In FY25, 319 key accountable employees, for whom the training is mandatory, completed the training module out of a total 367 (87% completion rate). All Non-Executive Directors have also completed the training.

Further awareness of training availability and events such as Anti-Slavery day are communicated with employees via our online communication platforms and media screens throughout our Operations.

**Tim Smith - Principal - Environmental,  
Social & Corporate Governance**  
**Justin Liebeck - Mining Supervisor**  
Bronzewing Operations  
Yandal Production Centre, Western Australia





Risk identification & assessment

We assess the modern slavery risks in our Operations and supply chains using a comprehensive due diligence process.

An Inherent Risk Assessment based on a combination of country risk, product risk, and total spend, with relative weightings appropriate to our risk profile, is performed. The assessment targets our Key Tier 1 suppliers and assesses the risk of modern slavery based on the prevalence of modern slavery within the supplier’s country of operation and primary product/service provided by the supplier. Risk ratings received for the suppliers are classified as low, medium, high and critical.

Once determined, we use processes including SAQs and Audits to investigate further the suppliers’ modern slavery risks and determine their overall risk rating. Material findings are addressed with corrective action plans which we engage with and assist the supplier to complete.

Refer to figure 10 for steps taken in our modern slavery due diligence process to identify and mitigate the risk of modern slavery within our Operations.

Figure 9 Risk Classification Criteria

Classification Criteria	
Critical	Supplier with high exposure to country, brand and reputational risks
High	Supplier with significant exposure to country, brand and reputational risks
Medium	Supplier with moderate exposure to country, brand and reputational risks
Low	Supplier with low exposure to country, brand and reputational risks



Robert Currell - Process Technician  
Thunderbox Operations  
Yandal Production Centre, Western Australia

Figure 10 Modern Slavery Risk Assessment and Due Diligence Practices

Inherent risk

- Step 1:** The active suppliers in the Northern Star database are identified through supply chain analysis.
- Step 2:** Database housekeeping is performed to ensure all spend data and contact details are up to date in the database we use.
- Step 3:** Key Tier 1 suppliers are identified from the active suppliers to take part in the upcoming due diligence campaign.
- Step 4:** Key Tier 1 suppliers undergo an Inherent Risk Assessment where risk criteria including current country risk, supplier spend, and product risk (with appropriate weightings) are applied.
- Step 5:** Suppliers with a risk rating of high or critical are selected to take part n the SAQ process.

SAQ

- Step 6:** SAQs are sent out to eligible suppliers by our external consultant.
- Step 7:** Returned SAQs with suppliers' responses are verified by an independent auditor for final risk rating.
- Step 8:** Suppliers who fail to return an SAQ are contacted and requested to complete or will become eligible for the Refusal to SAQ process.
- Step 9:** Initiate the Refusal to SAQ process for eligible suppliers<sup>9</sup>.
- Step 10:** Suppliers are reviewed during the Refusal to SAQ process. The CFO determines if the supplier will receive a waiver and automatic eligibility for the next SAQ process or if the supplier will be suspended.
- Step 11:** Suppliers are selected for audit based on the analysis of their verified SAQ results.

Audits

- Step 12:** Suppliers are notified of their selection for audit by Northern Star followed by written instruction of next steps from our external consultant.
- Step 13:** A pre-audit meeting with the external consultant takes place to explain next steps.
- Step 14:** An external auditor performs the audit as discussed with the supplier and issues Northern Star with a detailed report upon completion.
- Step 15:** Suppliers who fail to participate in an audit will initiate the Refusal to Audit process.
- Step 16:** Suppliers are reviewed during the Refusal to Audit process. The CFO determines if the supplier will receive a waiver, and an audit performed at a later date or if the supplier will be suspended.
- Step 17:** Suppliers with an audit risk score of low require no further action and are exempt from the following SAQ campaign.
- Step 18:** Suppliers with an audit risk score of medium undergo a follow up audit at the discretion of the Company which is dependent on the audit findings.
- Step 19:** Suppliers with an audit risk score of high or critical are automatically subject to a follow-up audit. A corrective action plan is issued with a specific timeframe to complete the actions.
- Step 20:** The Company will continue to engage with suppliers until their risk ratings are satisfactory.

<sup>9</sup> In FY25, eligible suppliers were defined as a suppliers with an inherent risk of medium or above as well as a \$1,000,000 or more spend.



Supplier due diligence

Supplier due diligence processes undertaken by Northern Star consist of multiple stages including an Inherent Risk Assessment, SAQs and Audits of our suppliers. The decisions as to which suppliers are required to undergo which processes depends on their individual risk ratings received from these processes. See the steps involved in the due diligence process outlined in the Risk identification and assessment section page 29.

In previous years we concentrated our assessment of modern slavery risks on Tier 1 suppliers only. As modern slavery can exist at any point in our supply chain, including Tier 2, Tier 3 or any other suppliers deeper into our supply chain, it is important that we understand the risks of potential modern slavery at Tier 2 and below. This ensures we are taking all reasonable measures to identify any instances of modern slavery within our supply chain.

In FY24, we worked with one of our Tier 1 suppliers in our Jundee solar panels pilot assessment of our Tier 2 and Tier 3 suppliers to better understand the risk and how Northern Star may apply a similar assessment across our wider supply chain.

In FY25, we continued to work with our Tier 1 supplier to better understand the modern slavery risk across multiple stages of our supply chain. We took a deeper dive into our Tier 2 and Tier 3 suppliers as part of the pilot assessment. A similar SAQ process used by Northern Star was applied to the Tier 2 and Tier 3 suppliers to gain a greater knowledge of any risks that may exist.

Further information of the case study is provided on page 33.

Inherent risk

Following the Inherent Risk Assessment, Northern Star uses the results to understand the modern slavery risks associated with our supply chain. The inherent risk ratings applied to a Key Tier 1 supplier determines the form of due diligence undertaken to further explore the risk associated with a Tier 1 supplier.

In FY25, we extensively analysed the supplier base of Northern Star to identify gaps that existed in our database and identify potential improvements to increase supplier engagement with our due diligence processes. We defined clearly the suppliers required to participate in the due diligence process (Key Tier 1 suppliers) and ensured decisions were made based on the most up to date and accurate data. This involved a full review of all existing supplier risk data included in their previous inherent risk results to determine if it was representative of their current business with the Company. In the case of some existing suppliers, the most recent Inherent Risk Assessment performed did not include updates to their spend data or had the most recent country risk applied. As a result, all inherent risk data for suppliers was refreshed in the system to ensure no gaps exist.

As per our FY24 commitment, all additional suppliers who had not previously been added to the database were reviewed and uploaded. An Inherent Risk Assessment was performed on these suppliers to ensure all suppliers in FY25 had current spend, product and country risks considered.

A total of 1,147 suppliers were assessed, with 10 returning a critical risk rating, 186 returning a high risk rating, 694 returning a medium risk rating, and 257 returning a low risk rating.

SAQ

To improve supplier participation in the SAQ exercise, a data cleansing initiative was undertaken at the start of the FY25 campaign. This ensured that SAQs were distributed to the correct supplier contacts. SAQ participation then increased from 51% to 58%.

Upon review of non-responding suppliers, it was noted that several Key Tier 1 suppliers included in the FY25 SAQ process had ceased doing business with Northern Star. In response, the definition of an active supplier was revised to include only those with spend in the previous financial year. This adjustment will improve the relevance and efficiency of future SAQ campaigns.

As part of the analysis, a sample of non-responsive Key Tier 1 suppliers was selected for review under the Supplier Refusal to SAQ procedure. Selection criteria included an inherent risk rating of medium or higher and a minimum FY24 spend of \$1,000,000. 13 suppliers met these criteria and were issued a final notice to comply with the Company's SAQ requirement. This notice also outlined the next steps in the Supplier Refusal to SAQ process.

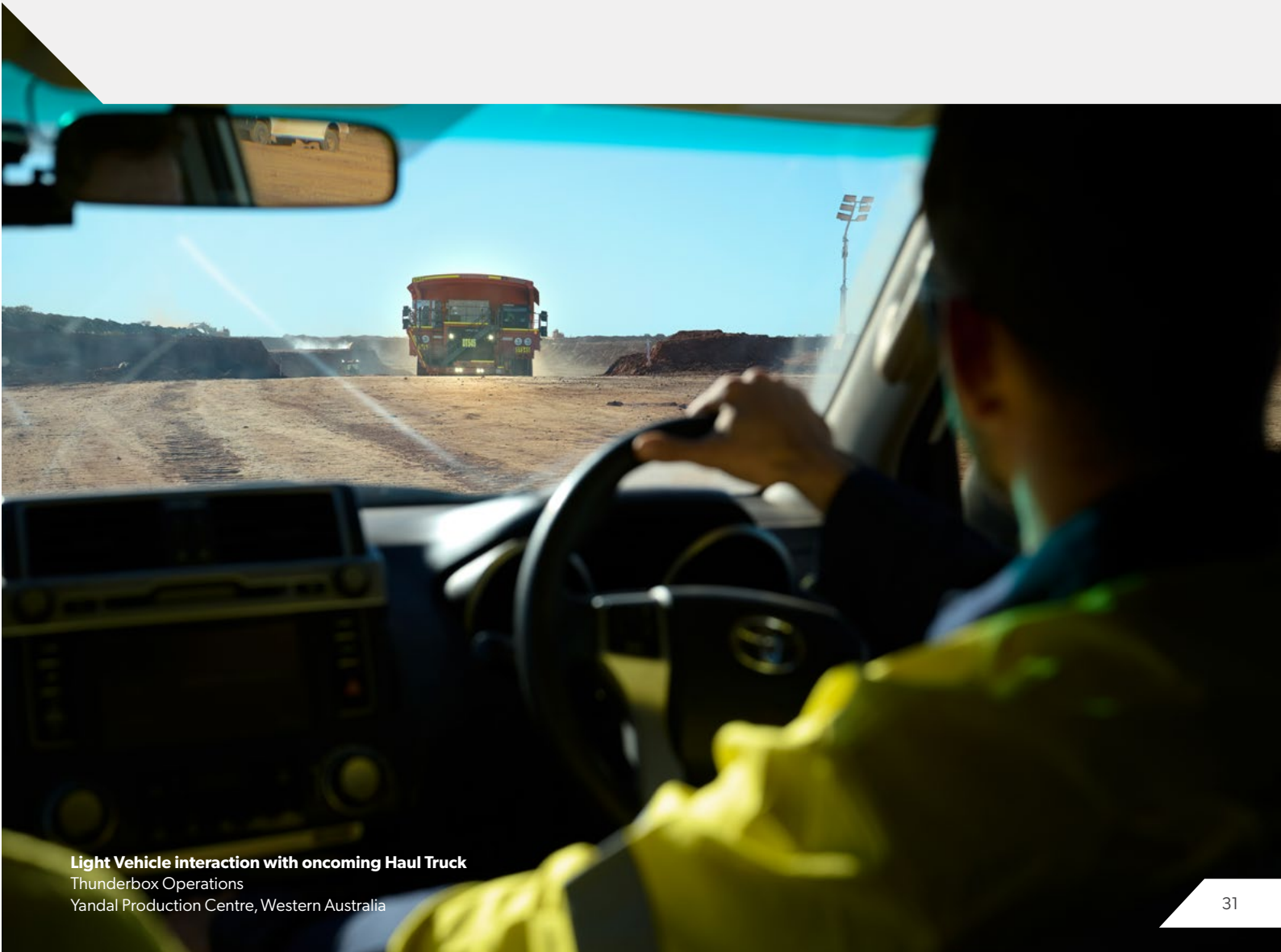
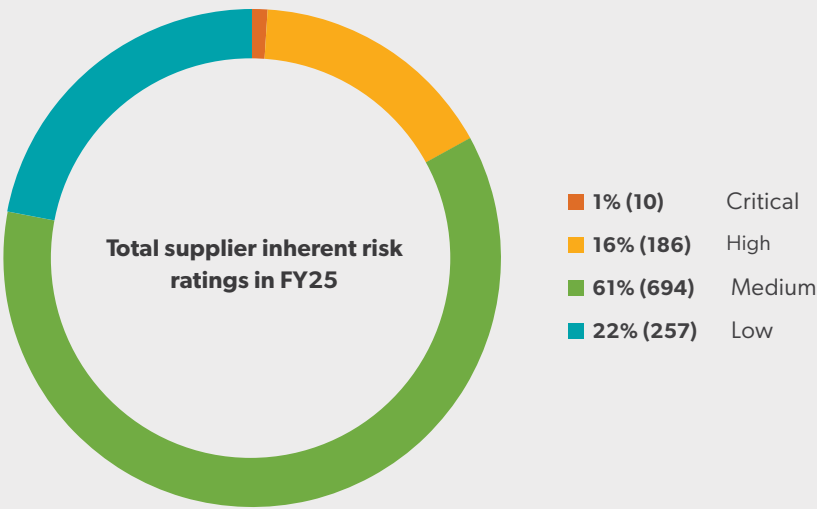
Of the 13 suppliers, nine did not comply. These cases were reviewed by the CFO and Procurement Manager to determine the appropriate outcome:

- a waiver for exclusion from the FY25 campaign, with automatic inclusion in the following year's SAQ campaign (subject to approval by the CFO); or
- supplier services put on hold.

Six suppliers were granted a waiver for FY25 as a result of their criticality to business operations. They will be expected to participate in the FY26 campaign. The other three suppliers did not have current or consistent business with Northern Star and with the risk of modern slavery unable to be determined, were put on hold (suspended).

In FY26, we will further review and strengthen the Supplier Refusal to SAQ procedure. We intend to engage directly with non-responding suppliers to understand the reasons behind their non-compliance. Where no satisfactory explanation is provided, we will continue to apply and enforce the procedure to uphold the integrity of our due diligence framework.

Figure 11 FY25 Total Supplier Inherent Risk Ratings



Light Vehicle interaction with oncoming Haul Truck  
Thunderbox Operations  
Yandal Production Centre, Western Australia





Audits & corrective action plans

As part of the audit campaign in FY25, Northern Star continued its commitment to supplier oversight by conducting audits through an independent external consultant. The consultant has access to certified auditors in over 100 countries, each with local knowledge of relevant legislation and regulations with which our suppliers, and their sub-suppliers, must comply. These auditors carry out in-person audits on selected Tier 1 suppliers.

A key objective of the campaign was to identify suppliers for audit who present a higher inherent modern slavery risk, either by operating in high-risk industries or in regions with increased reported instances of modern slavery. In alignment with our FY24 commitments, four labour hire suppliers were selected to participate in a comprehensive human rights audit. This audit included a premises inspection, a review of relevant policies and wage records, and in-person interviews with labour hire employees.

All four labour hire companies completed their audits successfully. Required corrective actions were communicated to each supplier, with the expectation that these actions will be implemented prior to follow-up audits.

However, one labour hire supplier contacted during the campaign was resistant to the audit process and failed to comply with the timelines set by Northern Star. As a result, the Supplier Refusal to Audit procedure was initiated, and the supplier’s services were subsequently put on hold. (See the case study on page 34 for further details.)

The remaining suppliers selected for audit were chosen based on their inherent risk rating and their verified results from the Supplier Assessment Questionnaire (SAQ) process. All remaining audits were successfully completed and corrective action plans issued as required.

Another key activity in the FY25 campaign was the completion of outstanding follow-up audits from FY24, while also progressing toward our FY25 performance targets. A total of six follow-up audits were conducted, with all suppliers demonstrating a satisfactory reduction in modern slavery risk. This positive risk reduction confirms the effectiveness of our current audit practices and supports the identification of any emerging gaps, allowing us to continuously improve our due diligence processes.

Photo:  
**Jundee Wind Turbine**  
Jundee Operations  
Yandal Production Centre, Western Australia

Case Study: Ongoing renewable energy supply chain assessment

In FY25, Northern Star continued our development and implementation of clean energy transition projects. The global demand for solar panels and other renewable energy infrastructure is a concern for Northern Star in relation to the risk of modern slavery.

We have continued to work with our Tier 1 supplier who is responsible for our solar array installation at Jundee and further expand the scope of our deep dive into their supply chain, our Tier 2 suppliers. The aim of this pilot assessment was to gain an understanding of the modern slavery risk in a subset of the total supply chain related to the production, supply and delivery to our Operations of the solar panels.

As part of the pilot assessment in FY24, we completed supply chain mapping and the Inherent Risk Assessment of our Tier 1 production suppliers using our independent external consultant. We further examined their Tier 2 distribution suppliers (our Tier 3 suppliers) by completing a similar exercise on the manufacturing companies involved in their solar panel supply chain. This year we were committed to completing the supply chain mapping of our Tier 2 supplier’s transportation and shipping companies, again with full support of both our Tier 1 and Tier 2 distribution suppliers. Three additional companies responsible for the transportation and delivery of solar panels to Australia, all based in China, were identified as part of this process. They all had their Inherent Risk Assessment performed by our independent consultants completing the full supply chain mapping and Inherent Risk Assessment of our Tier 3 suppliers responsible for our solar panel supply chain.

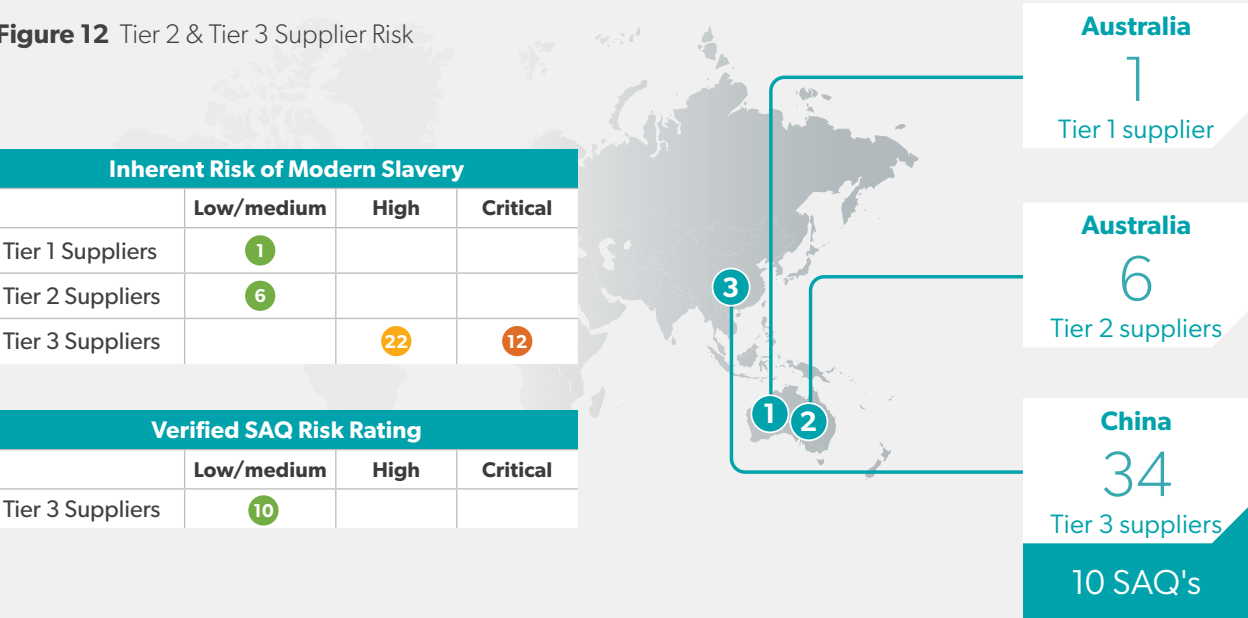
A second objective of FY25 was to complete a detailed SAQ process of the previously identified manufacturing Tier 3 suppliers all based in China. We identified a sample set of ten suppliers which covered a range of both critical Inherent Risk Assessment results and the manufacturing type the companies were involved in at their individual plants such as components or chemicals. This allowed us to gain a greater

understanding on all aspects of the solar panel supply chain. Our SAQ questionnaire was shared with our Tier 1 supplier who in turn initiated the SAQ process in conjunction with the Independent consultant and our Tier 2 supplier. The requests were received well by our Tier 3 suppliers who all agreed to take part in the process. Once all the SAQs were completed it was observed that all but one supplier returned a critical risk. Our Tier 1 supplier notified us of the initial results however it was observed by the consultants that the SAQs returned had omitted required paperwork and policies which resulted in the critical result. After further analysis of the questionnaires the Tier 3 suppliers were approached to explain the necessity of completing the SAQ in full to obtain an accurate risk rating that reflects their actual operations. The Tier 3 suppliers then resubmitted their SAQs with all the required documentation, resulting in all the risk ratings reducing to low.

After the completion of this exercise and once all results were verified, we were able to analyse the outcomes of the pilot assessment. One observation that stood out was the importance of our risk-based activities and the need for our suppliers to complete their SAQ as fully and comprehensively as possible to allow further risk-based decisions to be made. This has resulted in Northern Star and our Tier 1 and Tier 2 suppliers involved in this pilot assessment to review our SAQ processes and continue to improve them. It has also highlighted the need to review SAQs individually and consider implementing SAQ corrective action plans for suppliers who incorrectly complete their SAQs. This will help to avoid the recurrence of incorrect risk ratings of our suppliers taking part in the process and allow suppliers to accurately reduce their modern slavery risks.

Through the collaboration with all supplier stages of our solar panel supply chain and the ability to work directly with them, we have gained insights into the gaps in our current processes. It has also heightened the focus by our suppliers to continue to improve and increase the scope of their modern slavery due diligence to deal with any future risks they encounter.

Figure 12 Tier 2 & Tier 3 Supplier Risk





Contract termination

Northern Star’s preference is to work collaboratively with any Tier 1 supplier who continues to engage in our modern slavery due diligence practices. We aim to identify the underlying reasons for the lack of engagement and share our knowledge and resources to assist our suppliers to participate. This proactive effort will address the risk of modern slavery more than terminating contracts, which we believe is unlikely to modify a supplier’s business practices.

If a Tier 1 supplier continues to disengage, an assessment is conducted to determine if we will continue to procure from the supplier in the future. Our Chief Financial Officer has the discretion to terminate contracts following this assessment.

Alternative Tier 1 suppliers who willingly collaborate with Northern Star on modern slavery risk will be shown preference for procurement contracts.

Case Study: Supplier refusal to audit termination

In FY25, the Procurement Manager was informed by a General Manager at a Northern Star site that, via word-of-mouth, employees of one of our Tier 1 suppliers working onsite had allegedly not been paid superannuation as part of the remuneration provided by the supplier. Although the complaint was not formally submitted or made directly to Northern Star, it was acknowledged as a potential modern slavery risk. As such, it was decided to investigate the supplier as part of our due diligence process to assess and mitigate any associated risks.

Initially, our third-party consultant was notified of the supplier’s inclusion in the campaign, and an Inherent Risk Assessment was conducted. The supplier received a medium inherent risk rating and was therefore included in our Supplier Assessment Questionnaire (SAQ) process. The supplier was asked to self-assess and provide evidence where required for each section of the questionnaire. The SAQ groups questions into two primary categories: labour and management systems, both of which are individually scored and weighted.

Upon submission of the SAQ, an independent auditor reviewed the documentation and verified compliance with each question. The verification resulted in an overall high-risk rating for the supplier. Notably, the labour category received a high-risk score, indicating poor compliance across several findings of varying severity. As a result, it was determined that a formal audit would be the next step to further investigate the supplier’s operations and better understand the risks involved.

Once Northern Star deemed an audit appropriate, the supplier was notified of our intent to proceed. Initially, the supplier agreed to cooperate with the audit process. We engaged our consultants, who then contacted the supplier to request the completion of a pre-audit questionnaire and to attend a pre-audit meeting outlining the next steps. However, after some time, our consultant reported that the supplier had failed to respond to any follow-up communications regarding the audit.

Consequently, the Procurement Manager initiated the preliminary steps of the Supplier Refusal to Audit procedure. Northern Star reached out directly to the supplier to understand the reason for their non-responsiveness and to remind them of their obligation to comply with our Supplier Code of Conduct. A final deadline for cooperation was issued but passed without any action from the supplier.

As part of the Supplier Refusal to Audit procedure, the Procurement Manager reviewed and assessed the potential risk of modern slavery within the supplier’s operations. Due to the supplier’s ongoing lack of engagement and refusal to participate in the audit process, the risk could not be mitigated. As a result, the supplier’s services were placed on hold, and they were formally notified of this decision.

In an effort to try to ensure that human rights are not violated by suppliers in our supply chain, it is important to Northern Star to continue to try to engage with suppliers who attempt to disengage as a result of modern slavery concerns being raised with them.

Figure 13 Supplier Life Cycle Management



Robert Mills – Projects Superintendent  
Carosue Dam Operations  
Kalgoorlie Production Centre, Western Australia



# 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 risk management practices.

We consider an effective response to modern slavery to be the ability to detect and address modern slavery risks within our Operations and supply chain. We continually review and assess our processes to ensure that any gaps that may exist are identified and actioned where possible.

In FY25, the Modern Slavery Working Group identified a number of key due diligence and training performance targets for some of the metrics reported in Table 1. The committee recognises that measuring performance against goals assists in assessing the effectiveness of our actions. These goals were considered and decided upon based on what the committee considered to be an effective result.



Maxwell Osae - Mining Technician  
Thunderbox Operations  
Yandal Production Centre, Western Australia

Table 1 Performance Metrics proposed for use from FY25

Category	Metric	Indicative past performance			FY25 Performance Targets	FY26 Performance Targets
		FY25	FY24	FY23		
Training	% of key accountable employees who have current modern slavery awareness training	87%	81%	61%	75%	80%
	% Non-Executive Directors and leadership team who have current modern slavery awareness training	100%	100% <sup>10</sup>	100% <sup>10</sup>	100%	100%
Supplier due diligence	# SAQs issued to suppliers for completion	205	166 <sup>11</sup>	86 <sup>12</sup>	N/A	N/A
	% responses received for SAQs issued	58%	57% <sup>13</sup>	34% <sup>13</sup>	70%	70%
Audits	# Initial audits completed	7	10	1	8 per annum	8 per annum
	# corrective action plans issued	3	4	1	N/A	N/A
	# follow up audits conducted, verifying CAP actions have been satisfactorily completed <sup>14</sup>	6	1	2	N/A	N/A
Corporate governance	# of Refusal to Audit suppliers	1	0	0	0	0
	# of whistleblower reports received that concerned alleged modern slavery	0	0	0	0%	0%

<sup>10</sup> FY23 and FY24 results are based on the % ESS & ARC Board Committee members trained only.  
<sup>11</sup> Number of SAQs issued has been restated due to the database cleansing undertaken in FY25. Data has been corrected and is reflected in the update.  
<sup>12</sup> Typographical error in FY24 report. See FY23 modern slavery statement for reference to original number.  
<sup>13</sup> % Response has been restated to reflect the database cleansing undertaken in FY25. Data has been corrected and is reflected in the update.  
<sup>14</sup> This metric looks at follow up audits completed on suppliers who may have been audited in previous years, pending the timeframe given to complete corrective actions. For example, a supplier audited in FY24 may have received a corrective action plan with 12 months to complete actions, so the follow up audit occurred in FY25.



# Planned Actions for FY26

In FY26, in addition to striving to meet our FY26 performance targets, we intend to complete the following actions:

- Review the categories of the key accountable employees required to receive mandatory modern slavery awareness training to ensure all employees with a direct link to areas of our Operations which may encounter modern slavery or carry higher than usual risks of modern slavery are identified.
- Review our modern slavery awareness training and incorporate any changes required with Anti-Slavery Australia.
- Work with the procurement team to improve the integrity of our existing data in our internal database.
- Review and assess our due diligence processes to determine their suitability for our increasing number of Key Tier 1 suppliers.
- Review the quality and integrity of the data in our external database.
- Aspire to gain independent limited assurance certification for data contained within our FY26 Modern Slavery Statement.

We will report our progress against these actions in the FY26 Modern Slavery Statement.

Photo:  
**Janelle Felfar - Apprentice - Fitter - LV**  
**Mere Ana Holley-Wall - Light Vehicle Mechanic**  
Thunderbox Operations  
Yandal Production Centre, Western Australia





# Glossary

**The Act**  
Australian Modern Slavery Act 2018 (Cth).

**Active supplier**  
Any Tier 1 supplier that had a spend with Northern Star in the previous financial year only.

**ARC**  
Audit & Risk Committee.  
The Audit and Risk Committee, a sub-committee of the Board.

**Board**  
Board of Directors.

**CAP**  
Corrective action plan.

**Employees**  
Total number of Group employees including permanent, fixed term and part-time.

**ESR Disclosure Suite**  
Refers to the nine separate disclosures related to environment and social responsibility information available on the Northern Star website.

**ESG**  
Environment, Social & Governance.

**ESS Committee**  
Environmental, Social & Safety Committee, a sub-committee of the Board.

**FY**  
Financial year ended 30 June.

**Group**  
Northern Star Resources Ltd and all of its wholly owned subsidiaries.

**ISO 31000**  
The ISO 3100 Risk Management Guidelines, an international standard prescribing a structured approach risk management.

**key accountable employees**  
Group employees with a direct link to areas of our Operations which may encounter modern slavery or carry higher than usual risks of modern slavery.

**Key Tier 1 supplier**  
Any active supplier with a spend of \$100,000 or more in the previous financial year making them eligible for the Modern Slavery due diligence process.

**KPI**  
Key Performance Indicator.

**Limited Assurance**  
Audit and assurance undertaken by an external auditor on whether the data or statements made in this report have been prepared in accordance with GRI.

**Local Supplier**  
A supplier from a defined area surrounding our Operations, established by selected postcode boundaries for Western Australia or State boundaries for Alaska and Northern Territory.

**modern slavery**  
An umbrella term used to describe serious exploitation and human rights violations. Practices that constitute modern slavery can include:

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

**Modern Slavery Statement**  
The disclosure prepared by Northern Star to meet the requirements of the Australian Modern Slavery Act 2018 for the financial year ending 30 June.

**Modern Slavery Working Group**  
The internal group that oversees the identification and assessment of modern slavery risks within the Operations.

**Non-binary**  
Includes gender identities that demonstrate a diversity of expression beyond the binary framework. In addition, purely for the purposes of the data disclosed in this document, we have included the expression “Non-binary” the individuals who, when invited to identify their gender, responded with either “prefer not to say” or “prefer to self-describe”.

**Northern Star**  
Northern Star Resources Ltd ABN 43 092 832 892.

**P&C Committee**  
People and Culture Committee, a sub-committee of the Board

**Risk Appetite Statement**  
The risk appetite statement was adopted by the Board in FY25 and is reviewed annually.

**SAQ**  
Self-assessment questionnaire.

**stakeholders**  
An individual, group or organisation that is impacted by the Company, or has an impact on the Company. Examples of stakeholders are investors, employees, suppliers and local communities.

**Tier 1 supplier**  
Suppliers that Northern Star engages directly to provide goods or services to our Operations. Suppliers and contractors are interchangeable expressions throughout this Statement.

**Tier 2 supplier**  
Suppliers that are engaged by Northern Star’s Tier 1 suppliers to provide goods or services. Suppliers and contractors are interchangeable expressions throughout this Statement.

**Tier 3 supplier**  
Suppliers that are engaged by Northern Star’s Tier 2 suppliers to provide goods or services. Suppliers and contractors are interchangeable expressions throughout this Statement.

**UNGP**s  
United Nations’ Guiding Principles on Businesses and Human Rights.

**Workforce**  
Northern Star employees, Contractors and Contractor’s employees.

**\$**  
Australian dollars, unless the context says otherwise.