

2021 Modern Slavery Statement



OCEANAGOLD

About this statement

Reporting Entities

This is a joint statement by OceanaGold Corporation (ARBN 50 124 980 187) (**OceanaGold**) and Oceana Gold Pty Ltd (ABN 56 107 488 200) (**OGPL**) (together the **Reporting Entities**). OceanaGold is the parent company of the OceanaGold Corporation Group and both OceanaGold and OGPL are Reporting Entities under the Modern Slavery Act 2018 (Cth) (**Australian Modern Slavery Act**).

This Statement covers the reporting period from 1 January 2021 to 31 December 2021.

All references in this statement to “we”, “us”, “the Group” and “OceanaGold”, refer to OceanaGold and its subsidiaries as a Group, unless otherwise stated.

Consultation

The drafting of this Statement was led by a drafting committee sub-group from OceanaGold’s Responsible Supply Chain Working Group. The Working Group is a cross-functional group including representatives from our operations and offices, across Commercial, Finance, Legal, Compliance and Governance, External Affairs and Social Performance and Health, Safety and Environment.

The Executive Leadership Team (ELT) of OceanaGold and Executive General Managers (EGMs) also reviewed this Statement. The ELT comprises the Executive Vice Presidents (EVPs) who are functional leads with key responsibility for the day-to-day management of the Group. The

Executive General Managers of our operating countries report to the Chief Operating Officer, a member of the ELT. Some of our ELT members and EGMs are appointed directors of our Reporting Entities and their operating subsidiaries. Accordingly, the ELT and EGMs have been used to facilitate consultation between the Reporting Entities and across our controlled entities.

Approval

This Statement was approved by the Board of *OceanaGold Corporation* on 20 May 2022 on behalf of itself and *Oceana Gold Pty Ltd*.



Gerard Bond, President and Chief Executive Officer

Contents

About this statement	2
A message from our CEO	4
Our structure and operations	5
Our supply chain.....	10
Our modern slavery risks	15
Actions to assess and address modern slavery risks	22
Assessing effectiveness.....	34
Looking ahead	36

Mandatory Criteria 1: Identify the reporting entity	About this Statement
Mandatory Criteria 2: Describe the structure, operations and supply chain of the reporting entity	Our structure and operations; Our supply chain
Mandatory Criteria 3: Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Our modern slavery risks
Mandatory Criteria 4: 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	Actions to assess and address modern slavery risks
Mandatory Criteria 5: Describe how the reporting entity assesses the effectiveness of such actions	Assessing effectiveness
Mandatory Criteria 6: Describe the process of consultation with any entities that the reporting entity owns or controls	About this statement
Mandatory Criteria 7: Any other information that the reporting entity considers relevant	A message from our CEO; Looking ahead

A message from our CEO

At OceanaGold our Purpose is mining gold for a better future.

The gold, copper and silver we produce help power the global economy, hold important historic and cultural significance and are essential to the renewable energy and transport sectors, life-saving medical devices and technology that connects communities around the world.

Our Vision is to be a resilient and dynamic gold miner, trusted to deliver enduring value through innovation, performance and sustainable growth. That Vision is brought to life by our Company Values – respect, one team, contribute and knowledge – that put the safety and wellbeing of our people, communities and environment at the forefront of the decisions we make.

Modern slavery exploits vulnerable people and abuses their basic human rights. It goes against our Values and our commitment to respecting the human rights of everyone impacted by our business and throughout our value chain.

This Modern Slavery Statement outlines our work during the 2021 calendar year, to better understand and manage and position us to reduce our possible exposures to modern slavery risks in our operations and our supply chain. It has been developed by members of our Responsible Supply Chain Working Group in consultation with external subject matter experts and reviewed by our Executive Leadership Team and approved by the Board of Directors.

I would like to thank all those involved in the ongoing work on our human rights and responsible supply chain programs. While we are pleased that we have achieved our stated goals for 2021, we recognise that addressing modern slavery risks is complex and that there is more work to be done.

The OceanaGold Board of Directors and Executive Leadership Team are committed to developing a framework that will help us better understand and reduce potential modern slavery risks in our operations and supply chains and guide us in responding to them.

In 2022 and over the next phase of our efforts, we will be focusing on strengthening the ways in which we set and communicate our expectations on human rights to our suppliers. As well as continuing to directly engage with suppliers, we also plan to develop our Supplier Code of Conduct and commence rolling out new contractual requirements on modern slavery risk management to a broader range of supplier contracts across our operations.

I look forward to sharing our continued progress with you in our future statements.



Gerard Bond

Chief Executive Officer

The background image shows an open-pit mine. In the foreground, two workers wearing white hard hats and high-visibility yellow safety vests are looking towards the right. In the background, a large yellow haul truck with "OCEANA GOLD" and the number "30" on its side is dumping material into a deep pit. The truck's body is marked with "730E" and "30". The pit walls are steep and rocky.

Our structure and operations

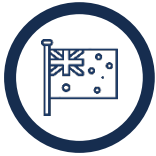
OceanaGold is a multinational gold mining and exploration company that has (taken together with OGPL) been publicly listed on the Australian Securities Exchange ('ASX') since 2004 and on the Toronto Stock Exchange ('TSX') since June 2007.

OceanaGold is incorporated in, and has its registered office address in Vancouver, Canada. OceanaGold's Australian registered office is located in Melbourne and OGPL's registered office is also in Melbourne.

Globally we have 2,319 employees (comprising 94.7% permanent employees) and 1,028 contractors (as at 31 December 2021). Our employees and contractors are based in Australia, Canada, New Zealand, the Philippines, Singapore and the United States.

Our structure

OceanaGold Corporation is the parent company of the Group. The Group's key operational assets are held under the following wholly owned entities:



Oceana Gold Pty Ltd (OGPL)

Incorporated in Australia and holds the Group's interests and operations in New Zealand



OceanaGold (Singapore) Pte. Ltd.

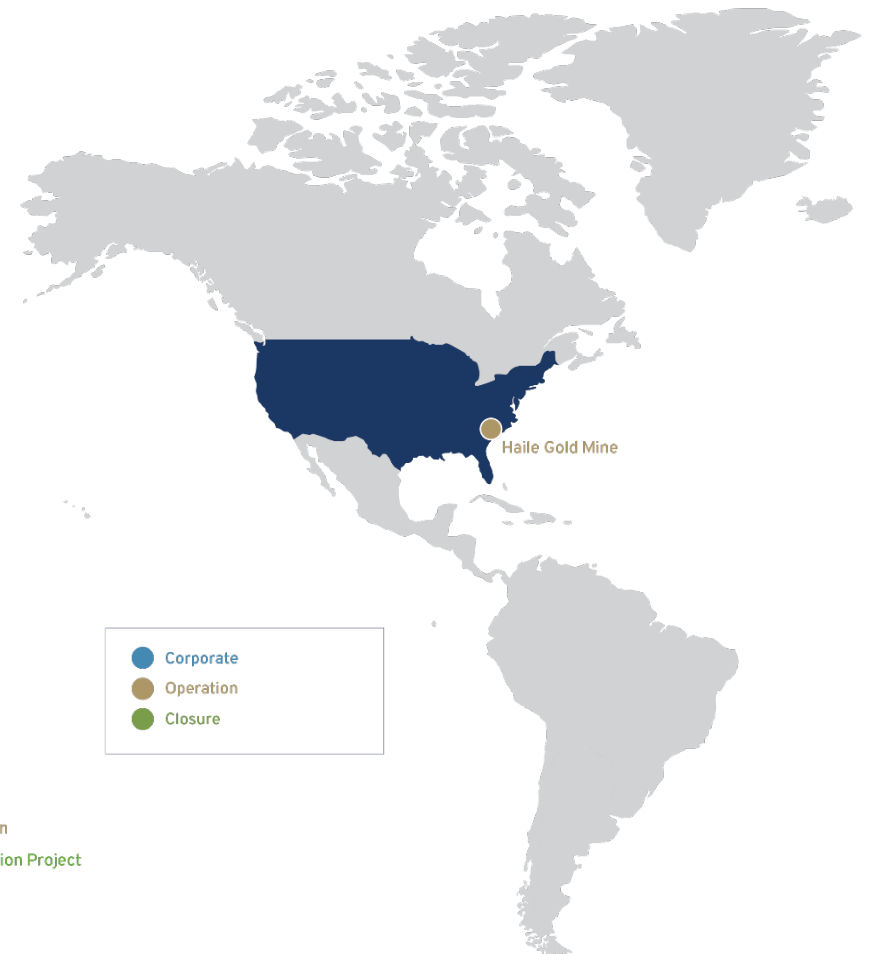
Incorporated in Singapore and holds the Group's interests and operations in the Philippines



Romarco Minerals Inc.

Incorporated in Canada and holds the Group's interests in the United States

There are a number of other entities in the OceanaGold Group including management companies, holding companies and subsidiaries. Our Annual Information Form on our website provides a full breakdown of the company structure.

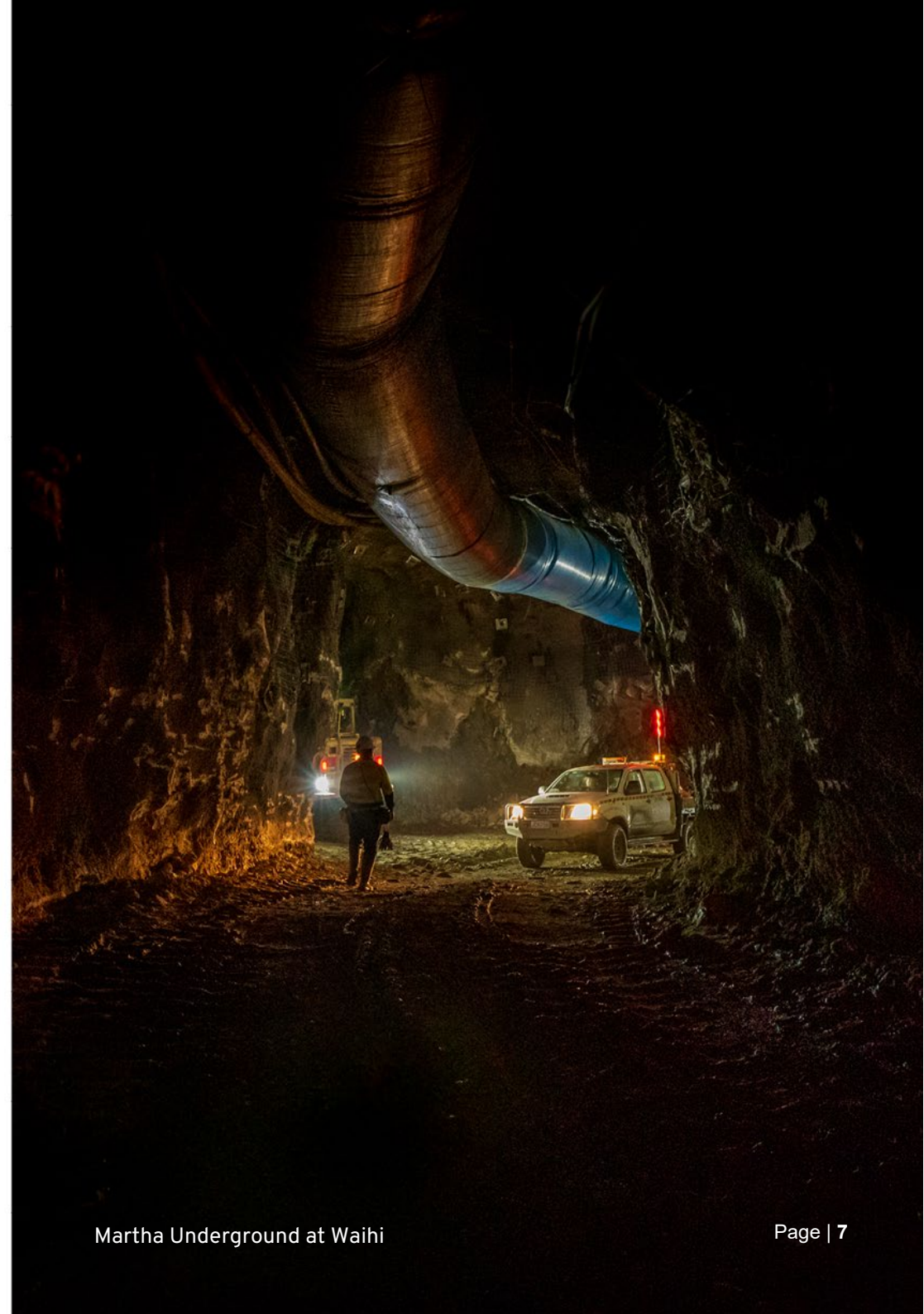


Our operations

Our core operations involve the exploration, development, extraction and processing of gold, copper and silver. We own and operate open pit and underground mines, the ore from which is processed at our on-site processing plants to produce gold and silver doré bars that are transported to refiners and then sold. The Didipio Mine also produces a copper-gold concentrate that is subject to an off-take agreement.

Our operations are supported by on-site Geology, Health & Safety, Environmental, People & Culture, Legal, External Affairs and Social Performance, IT and Commercial teams who manage procurement. Our corporate offices in Australia (Brisbane and Melbourne) provide governance over operations and these support functions as well as distribution and sales, with our regional offices providing localised legal, finance and IT support.

We currently have four operating assets, through which we contribute to economic growth, employment and skills development, and community and environmental partnerships.



Didipio, Philippines



Haile, United States of America



	Didipio	Macraes	Waihi	Haile
Mine Type	Gold, copper and silver mine	Gold mine	Gold and silver mine	Gold and silver mine
Location	Luzon Island, Philippines	South Island, New Zealand	North Island, New Zealand	South Carolina, United States of America
Employees*	645	653	355	598
Operation type	Underground operation producing gold and silver as doré bars and copper-gold concentrate	Open pit and underground operation producing gold as doré bars	Underground operation producing gold and silver as doré bars	Open pit operation producing gold and silver as doré bars

*As at 31 December 2021

Macraes, New Zealand



Waihi, New Zealand



Our other investments and projects

OceanaGold's operations also include a number of investments and development projects outside of our core assets. This includes participation in joint ventures and minor interests in other listed and unlisted companies.

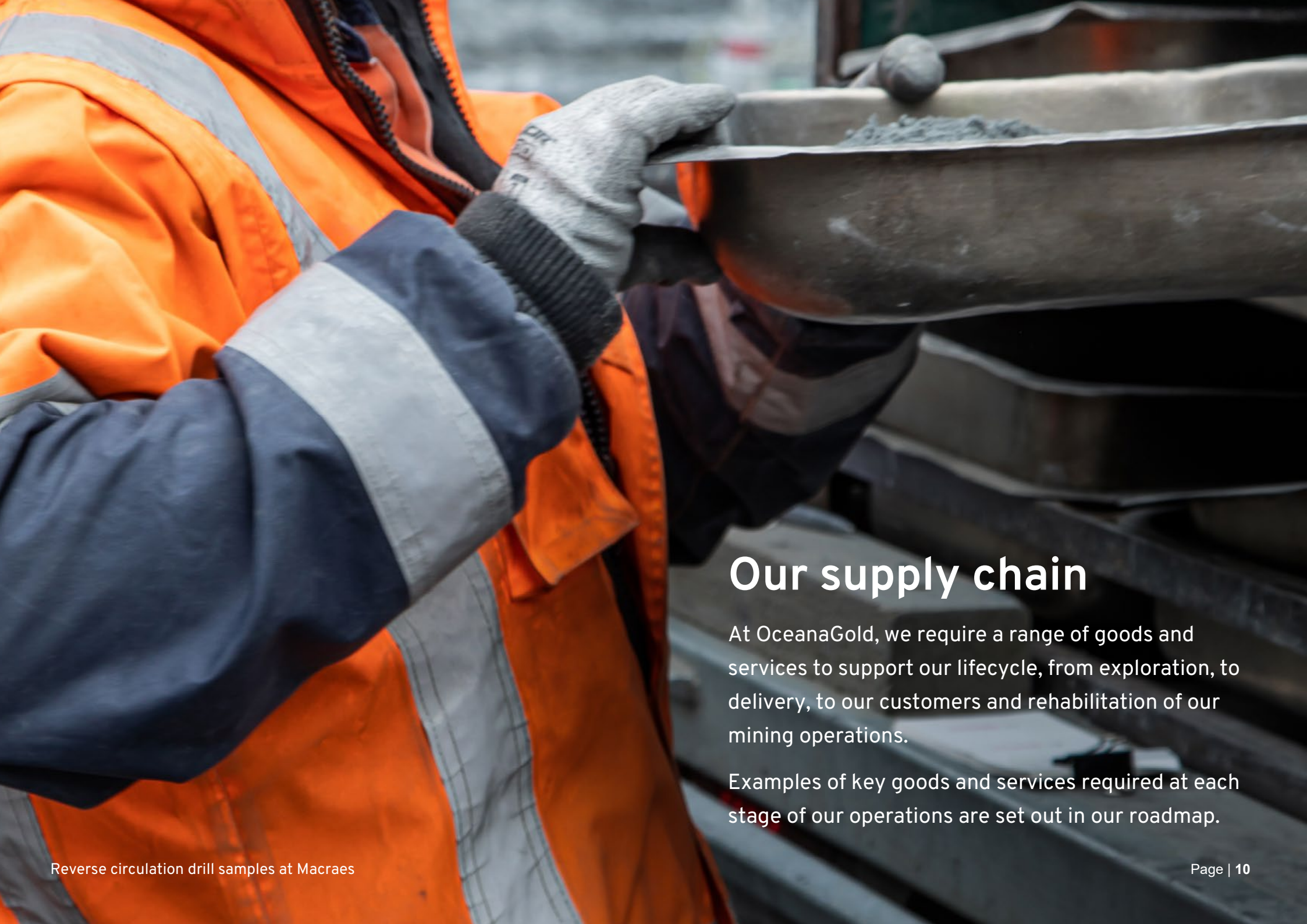
Our portfolio of investments and projects includes:

- Minor interests in NuLegacy and TDG Gold Corp publicly listed gold exploration companies conducting exploration activities in Canada and Nevada;
- Approximately 20% interest in Sam's creek project in New Zealand's South Island; and
- The Blackwater project in the South Island of New Zealand.

Our projects include; the Reefton Restoration Project (New Zealand) and Junction Reefs (Australia).

Further information in relation to OceanaGold's portfolio is contained in our 2021 Annual Information Form, available on our website.





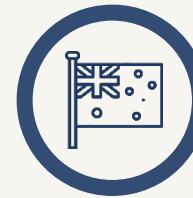
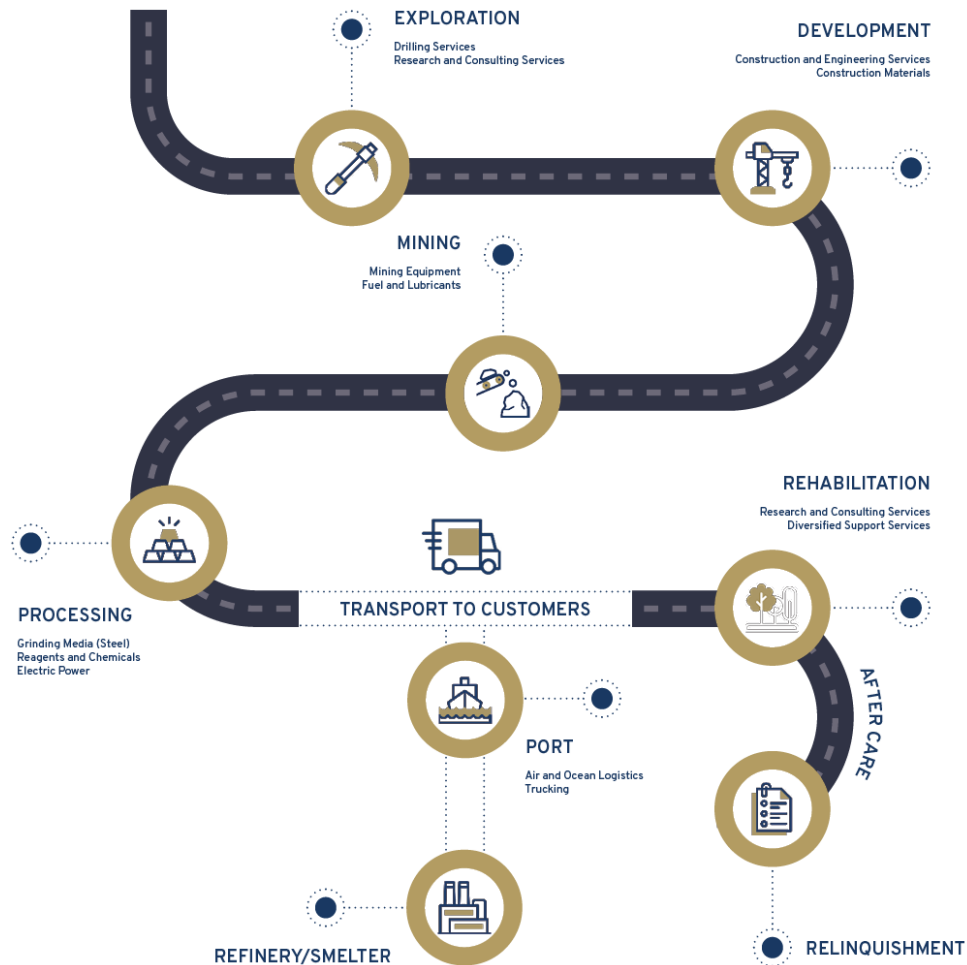
Our supply chain

At OceanaGold, we require a range of goods and services to support our lifecycle, from exploration, to delivery, to our customers and rehabilitation of our mining operations.

Examples of key goods and services required at each stage of our operations are set out in our roadmap.

Our supply chain roadmap

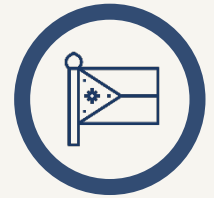
The below infographic outlines the principal elements of the mining life cycle in relation to our supply chain.



Perth Mint
Australia



Metalor
United States
of America



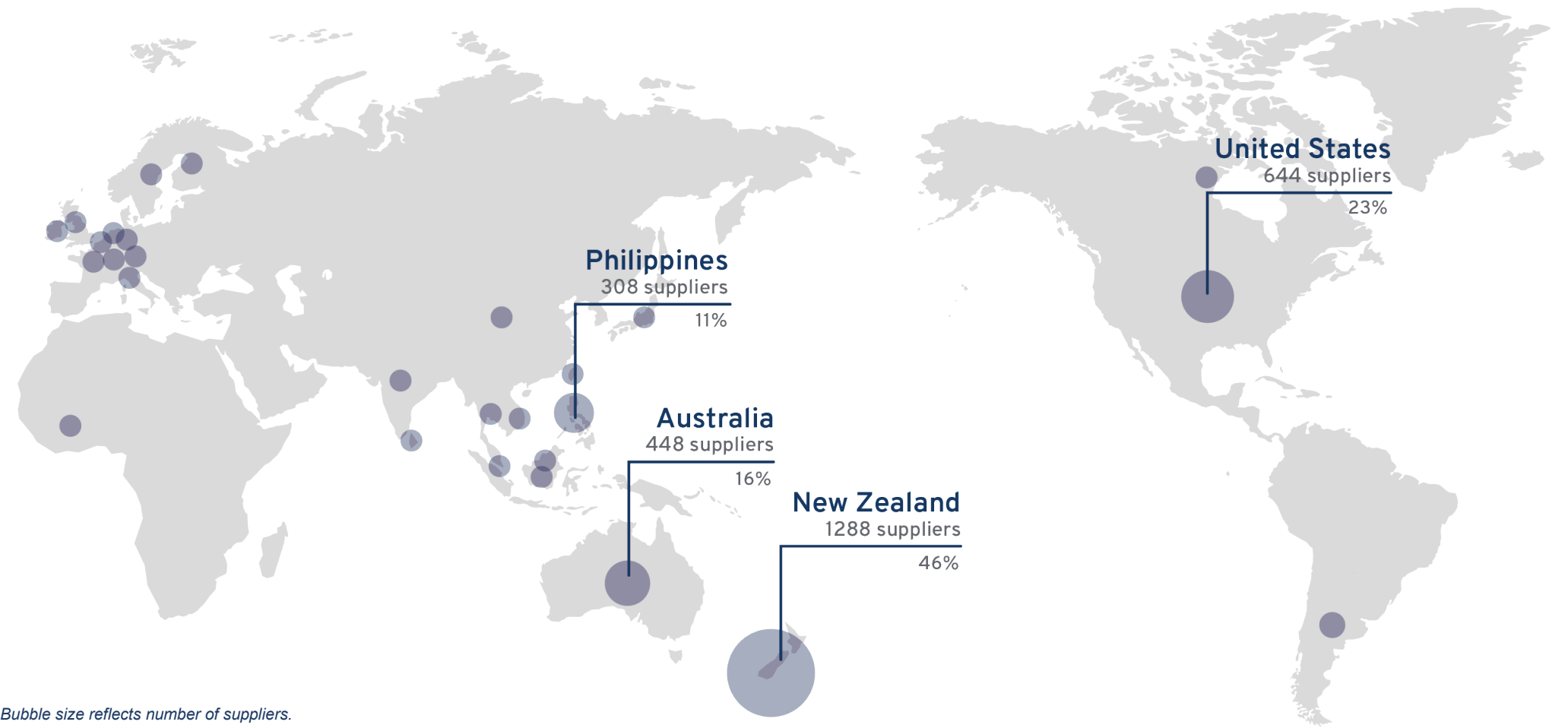
Trafigura
Philippines

In 2021, gold produced from our Philippines and New Zealand operations was transported to The Perth Mint Australia (Perth Mint), Perth, Western Australia and gold produced in the United States of America (USA) was transported to Metalor Technologies USA Corporation (Metalor), Boston, Massachusetts. The gold doré is refined and cast into London Bullion Market Association Good Delivery Standard bars and marked with the refiner stamp. Gold is sold to financial institutions and/or refineries.

We have a commercial offtake with Trafigura Group Pte. Ltd. (Trafigura) for the copper-gold concentrate produced in the Philippines. The Perth Mint, Metalor and Trafigura are all committed to responsible sourcing and their policies, setting out their socially responsible practices, are available on their websites.

Our suppliers

Set out below is a snapshot of our supply chain based on 2021 supplier data.¹



¹ The period 12 months to 31 December 2021. There were no material changes to the nature of our operations between the time of collecting this data and approval of this Statement.

OceanaGold's largest categories² of spend by product are:



² We use the Global Industry Classification Standard sub-industry definitions to identify the categories.

We have made some adjustments to how we have mapped and analysed our 2021 suppliers, compared to our 2020 suppliers disclosed in our previous Statement. These changes reflect continuous improvement in our approach and understanding of our supply chain and industry risks that looks beyond our first-tier suppliers and seeks to identify the underlying nature and source location of the goods and services procured. Our refined approach also recognised a higher inherent risk associated with labour-intensive suppliers. We applied a conservative designation to Diversified Support Services where applicable, which increased the number of suppliers in this group. This classification groups companies primarily providing labour-oriented support services such as cleaning and maintenance services which carries a higher inherent risk assessment and we will be continuing work to better understand this category and the practical risk exposures.

The total number of suppliers increased ~10% from 2020 to 2021, which has largely been driven by the resumption and ramp-up of operations at our Didipio Mine and increased mining activity at our Waihi operation. For more detail about our operations, see our [Sustainability Report](#) on our website.

Procurement of goods and services at OceanaGold is predominantly decentralised with operationally based commercial teams, with support from legal professionals. These teams are accountable for operational procurement activities, some minor procurement activities are also conducted by our corporate offices. We have agreements with 1,028 contractors (as at 31, December 2021). We employ contractors to undertake specialised activities. In 2021, this included activities such as processing plant shutdowns, fixed and mobile plant maintenance, road construction, rehabilitation earthworks, infrastructure development and tailings storage facility construction.



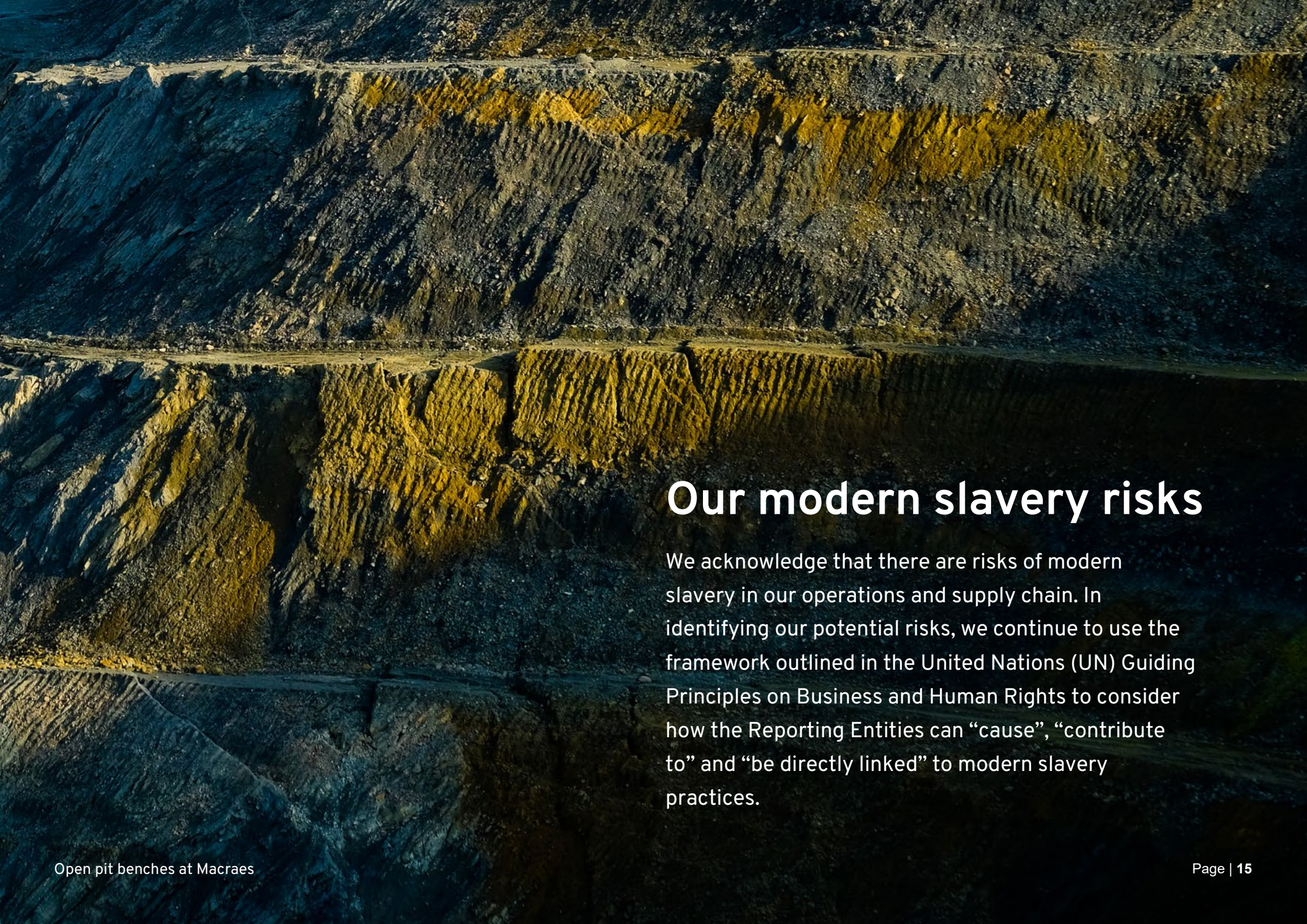
Employees in the Smart Centre at Waihi

Throughout 2021, our management of COVID-19 continued to require a flexible and adaptable approach at each of our operations – considerate of national and regional response requirements, local workforce demographics, resources and the physical aspects of the workplace.

A key priority is the health and wellbeing of our workforce and the communities in which we live and work. During 2021, we continued to communicate with the regulatory agencies in each operational jurisdiction, subscribed to the advice of the [World Health Organization](#), and reviewed industry best practice to assess opportunities to reduce potential exposure pathways to our workers and communities.

COVID-19 impacts in respect of our supply chain continued throughout 2021. The pandemic's impacts on global trade combined with border closures resulted in extended lead times, labour supply shortages and the need to source alternate products from new suppliers. We recognise that COVID-19 has heightened human rights risks, including modern slavery, in our supply chain. In particular, ocean freight providers and personal protective equipment (PPE) suppliers have been identified as two higher risk procurement categories as noted in our industry risks section.

More information about the impact of the COVID-19 global pandemic on our company, and how we responded, is available in our 2021 [Sustainability Report](#).



Our modern slavery risks

We acknowledge that there are risks of modern slavery in our operations and supply chain. In identifying our potential risks, we continue to use the framework outlined in the United Nations (UN) Guiding Principles on Business and Human Rights to consider how the Reporting Entities can “cause”, “contribute to” and “be directly linked” to modern slavery practices.

To better understand our risks relating to modern slavery we have:

- Conducted a risk assessment of our supply chain; and
- Completed Human Rights Impacts Assessments at each of our operations.

Risks in our operations

We recognise that by virtue of the nature of our business and the jurisdictions in which we conduct our business, our operations are potentially exposed to modern slavery. Potential modern slavery risk exposures in our operations are a focus of the Human Rights Impact Assessments (HRIA) we have conducted for each of our operations and there have been no material changes in the nature of our operations or within our supply chain which impact the findings of our HRIAs. To understand how we did this, read about our HRIA below.

We acknowledge potential inherent risks of our operations include:



Employees/labour – a risk of “causing” modern slavery if any of our employees or temporary workers were in exploitative situations. We understand this risk is heightened where we have employees in countries with higher modern slavery risks, in particular the Philippines.



Community – a risk of “contributing” or being “directly linked” to modern slavery if our workforce causes or contributes to modern slavery in the community (for example, if workers at one of our operations use exploited domestic workers). This risk is heightened where we operate in countries with higher modern slavery risks, in particular the Philippines.



Investments – a risk of being “directly linked” to modern slavery through our investments, if our investees are themselves involved in modern slavery.





Local store purchase in Kershaw near Haile

Risks in our supply chain

We consider that our most significant areas of potential risk for exposure to modern slavery practices is an indirect link through our supplier relationships.

To better understand the potential modern slavery and broader Environmental, Social and Corporate Governance (ESG) risks in our supply chain, in relation to our 2021 tier 1 suppliers, we undertook the following work.

Mapped each operation's suppliers based on business criticality, spend, location and industry. These indicators inform our understanding of potential modern slavery risks in our supply chain and give an indication of potential influence over suppliers and switching costs.

For each supplier we identified the most relevant industry according to the Global Industry Classification Standard (GICS) and the country of origin where, as far as practicable, we identified the principal place of manufacture. Changes in GICS allocation from the previous year reflect continuous

improvement in the understanding of our supply chain and industry risks. To continue to enhance accuracy and consistency a standardisation and alignment approach identifying the sub-industry or GICS was used at each operation. This included the alignment of supplier names and sub-industry allocation, as well as guidance and hands on support to each operation through-out the mapping process.

We also engaged Ernst and Young (EY) to support us in an inherent risk assessment of our tier 1 suppliers. The assessment considered potential risks if no controls were in place and leveraged publicly available indexes and information to assess country, industry and controversy risk across 36 risk factors in relation to 18 ESG risks³.

³ In 2021, EY's review process was refined to remove two categories of human rights risk, being discrimination and forced marriage. While these continue to be critical social issues, the inherent risk assessment methodology adopted by EY intends to

target areas of inherent modern slavery risk where the business may have a stronger causal relationship with the potential impacts.



Dump truck fleet at Macraes

The modern slavery risks considered were:



Forced labour
(including debt
bondage)



Child labour



Human trafficking

Each supplier received an inherent risk score which was classified as low, medium-low, medium or high in relation to modern slavery risk.



9% or 245 suppliers

were assessed to have a high inherent risk for modern slavery, with the majority of these suppliers located in the Philippines.

Forced labour and **human trafficking**
(including debt bondage)

were the most common risks identified.



6% or 159 suppliers

were assessed to have a high inherent risk across each of the three modern slavery risks.



Industry risks

We recognise that we engage with a number of high-risk industries as a result of the nature of our business. The inherent risk assessment, supplemented by further analysis undertaken by the business, identified that the supplier industries we source from which have the highest inherent modern slavery risks include:



Apparel Retail (PPE)*



Commercial & Professional Services



Consumer Durables & Apparel



Consumer Services



Capital Goods



Food & Staples Retailing



Freight Forwarding*



Health Care Equipment & Services



Materials



Technology Hardware & Equipment Software & services



Transportation

* Identified through supplementary analysis



Water testing at Waihi

The heightened inherent risk across the above industries is driven by the presence of known risk factors, which increase the vulnerability of exploitation occurring, as well as known controversies in the industries. These include, among others, the following:

Low skill level required to perform work

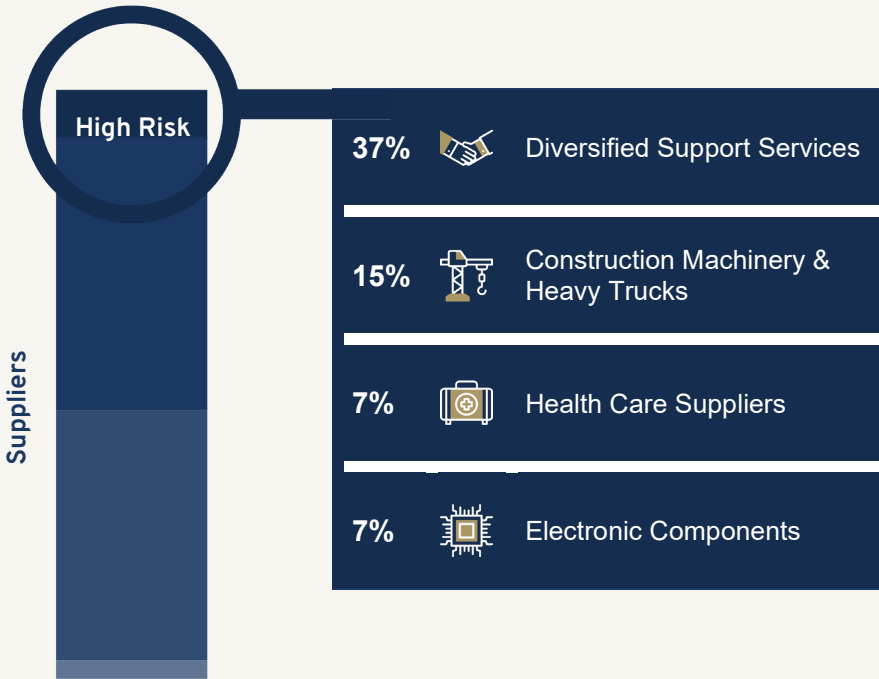
High prevalence of migrant labour

Presence of opaque intermediaries

Low levels of regulation within the industries

⁴ Sub-industries are defined as per GICS. Analysis conducted by EY.

The sub-industries identified with the largest percentage of inherently high-risk modern slavery suppliers were⁴:



Country risks

The following countries were identified through independent indexes as the highest risk countries for modern slavery within our tier 1 supply chain. The inherent risk assessment identified seven countries to have high risk for modern slavery.

These were:

- | | |
|-------------------------------|--------------------------|
| ● China (13 suppliers) | ● Taiwan (1 supplier) |
| ● India (3 suppliers) | ● Thailand (2 suppliers) |
| ● Malaysia (1 supplier) | ● Vietnam (1 supplier) |
| ● Philippines (318 suppliers) | |

We also identified one supplier in Cote d'Ivoire (which is a high-risk country), however they are a highly skilled researcher conducting specialised work.



We recognise that international organisations like the International Labour Organization and Global Slavery Index have flagged the Philippines as having high risk of forced and child labour. Based on this, the Philippines is a priority for understanding our overall residual risk (the risk after controls have been implemented) within our supply chain. Read more about the work we commenced at our Didipio operation in 2021, below in the Working with Didipio section.



Actions to assess and address modern slavery risks

Our approach to assessing and addressing modern slavery risks is incorporated within our broader responsible mining programs, in particular our:

1. Human Rights program, led by the External Affairs and Social Performance function; and
2. Responsible Supply Chain Management program, led by a cross-functional working group and sponsored by an Executive Steering Committee.



Macraes gold doré bar

Governance and policies

Our holistic approach to responsible mining is guided by a [Responsible Mining Framework](#) and supported by a board-level Sustainability Committee and a cross-functional working group.

The framework defines how we operate across our business, to manage potential economic, health and safety, employment, environmental and

social impacts and risks, while leveraging the potential to enhance positive outcomes for all our stakeholders, including third parties. Specifically, this framework provides us with a systematized approach, in which we can leverage the work we are doing around modern slavery.

Vision, Values, Purpose, Mission			What we want to achieve and how we will conduct our business
Statement of Business Ethics and Code of Personal Conduct			Behaviours that demonstrate our values
Integrated Management System	Corporate Governance Policies Privacy Continuous Disclosure Securities Trading Speak Up Risk Management Anti-bribery and Anti-corruption Investor Relations Majority Voting	Responsible Mining Policies Health and Safety Environment Communities Fair Employment Human Rights Government and Civil Society	Commitments to align business performance
	Statements of Position		Declaration of our position on material issues
	Performance Standards		Requirements to achieve policy outcomes
	Guidelines, tools and operational processes		Processes and materials to deliver responsible mining practices

Our [Statement of Business Ethics and Code of Conduct](#) is an overarching governance document that sets an expectation that all OceanaGold representatives including directors, officers and employees conduct all activities to high ethical standards, and states that the company requires the same high standards from contractors, suppliers and business partners. In 2021, we commenced a large program of work to refresh the Code of Conduct. This work is ongoing, and we are currently prioritising the launch of our refreshed Code of Conduct across the Group in late 2022.

Our External Affairs and Social Performance (EA&SP) Management System governs how we understand and manage our impacts on local communities and society at large. (More information on our EA&SP management system is available on our [website](#) and in our [Sustainability Report](#).)

As part of our EA&SP Management System, our [Human Rights Policy](#) and Standard commit us to respecting the human rights of everyone impacted by our business and throughout our value chain, in line with the [UN Guiding Principles on Human Rights](#), [UN Declaration of Human Rights](#) and other international frameworks. This includes requirements for:

- Identifying and mitigating human rights risks, including through HRIAs (discussed below);
- Establishing a grievance mechanism including remedy for adverse impacts (discussed below);
- Training (discussed below); and
- Consulting and communicating our human rights impacts.

Our approach to human rights helps us enhance our understanding of modern slavery risk across our value chain. The following infographic sets out our human rights governance structure:





Service hose at Macraes

Other key policy or performance standards that support our overall approach to managing modern slavery include:

- Our Group-wide Procurement Standard provides minimum requirements in relation to procurement processes. These requirements include that a supplier confirms a strong commitment to health and safety and compliance with applicable laws.
- Our [Fair Employment Policy](#) sets out our commitment to provide fair employment and workplace conditions, including compliance with all applicable workplace and employment laws as a minimum. It also strictly prohibits the use of forced, compulsory or child labour.
- Our [Government and Civil Society Policy](#) recognises the importance civil society organisations play in supporting and advocating for responsible business and improvements in the wellbeing of people and the planet. It sets out our support for the existence of an open civic space and commitment to work with civil society organisations in a variety of ways. It also sets out our commitment to partnerships across sectors to address complex challenges – of which modern slavery is an example.

Our policy requirements also help to drive performance towards external initiatives, including the World Gold Council, Responsible Gold Mining Principles (RGMPs), through which we are committed to producing conflict-free gold. Our operating jurisdiction with the highest potential for conflict minerals extraction is the Philippines, and we are undertaking an assessment of our Didipio Mine to assess and mitigate potential risks of contributing to conflict minerals extraction.

In 2018, we joined the United Nations Global Compact, and continue to participate in the Global Compact Network Australia's Modern Slavery Community of Practice, which provides a forum for sharing experiences with and learning from peers and experts.



Cutting core at Didipio

Operational risk assessment

OceanaGold recognises risk management is an integral part of operating our business and that an effective risk management framework can protect business value, reduce the potential impacts of hazards to the business, secure a safer work environment and growth opportunities and promote a risk-aware culture.

Risk management is considered by our operations and business units in their day-to-day activity. Each operation owns and manages the operational risks applicable to them. Risk management is the responsibility of all employees, contractors and consultants, who are each expected to understand and manage the risks within their area of accountability. More information is available in our [Risk Management Policy](#).

In 2021, we completed a series of introductory risk workshops across our operations, focused on responsible supply chain risk management. We also completed risk reviews and social risk assessments at our Haile Gold Mine and Didipio Mine. More information is available in our [Sustainability Report](#).

We use HRIAs as the due diligence tool to identify how our activities could potentially cause harm or contribute to a breach of human rights. Currently

we conduct HRIAs with the advice and expertise from independent consultants at Article One and continue to understand our risks by updating our HRIAs every two years (unless there is a material change).

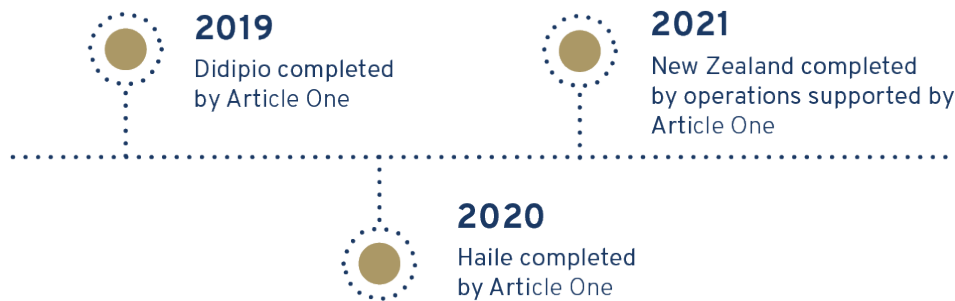
The process begins by assessing our performance against the full set of internationally recognised human rights benchmarks, to determine the most salient human rights risks for our employees, contractors, supply chain workers, communities and other key stakeholders. Guided by the [UN Guiding Principles on Business and Human Rights](#), the severity and likelihood of a potential adverse impact is assessed, considering the scale, scope and if an adverse impact can be remediated if it were to occur.

Article One implements the HRIAs using a desktop review of documentation, interviews and focus groups with rightsholders and stakeholders which may include OceanaGold and vendors, employees, management, contractors, community groups, government agencies and civil society.

Once a HRIA is complete, the respective teams review any gaps to establish actions.

In 2020, we developed a corporate KPI to track implementation of the actions in 2021 to close the gaps identified in the HRIAs. This highlighted the importance of managing human rights risks across our business.

By the end of 2021, all operations had completed a HRIA and associated three-year action plan to address any identified gaps, with the first year's actions effectively closed out. This included updating security procedures to align with the [Voluntary Principles on Security and Human Rights](#), formalising local contracts and incorporating human rights aspects into our existing complaints and grievance processes.



In 2022, we are again partnering with Article One, to release a human rights report outlining the key methodological steps taken to assess and understand our salient human rights risks resulting from the completion of our HRIAs.

There have not been any specific modern slavery issues identified in any of the operational HRIAs.





Excavator loading truck at Macraes

Responsible supply chain management

As noted above, our Group-wide Procurement Standard provides minimum requirements in relation to procurement processes, which include that a supplier confirms a strong commitment to health and safety and compliance with applicable laws.

Our approach to understanding our modern slavery risks is part of a broader program of work on our Responsible Supply Chain Management (RSCM) framework. This is a long-term program, which commenced in 2020, with a focus on practical implementation and effectiveness for understanding and managing third-party risks.

Development of our RSCM approach is governed by an Executive-led Steering Committee and led by a working group including representatives from our operations and corporate offices, across a range of functions including Commercial and Legal. We are also working with external industry and subject matter experts to support our RSCM approach and the development of our program so that we consider leading practice in our design.

We are also taking into account the RGMPs. These are 10 principles that set clear expectations about what constitutes responsible gold mining across key environmental, social and governance issues in our sector. Principle 3 of the RGMPs focuses on supply chain management, in particular setting expectations for suppliers to conduct their businesses ethically and responsibly as a condition of doing business with us. A key focus of our work to support this work is to continue developing and implementing a multi-year action plan for responsible supply chain processes across the organisation, including human rights and modern slavery. For more information on the RGMPs, see our [Sustainability Report](#) on our website.

During 2021 we continued our continuous improvement efforts including:



Completing an inherent risk assessment of our 2020 tier 1 suppliers, as noted in our 2020 Statement, and a residual risk assessment on a sample of suppliers identified as having potentially high or medium inherent risk for modern slavery. This work was supported by EY.



Undertaking an enhanced review of the sample of suppliers identified as potentially high or medium risk in the inherent risk assessment.



Developing enhanced template responsible supply chain contract clauses to be included in the procurement process across the Group. These clauses address various ethics and compliance risks, including modern slavery.



Continuing to build the Responsible Supply Chain Management Framework, including consulting with key commercial / procurement stakeholders at each operation.





Working with Didipio

As noted above, we recognise the Philippines has higher modern slavery risks. We have therefore identified Didipio as a priority site in our program of work.

During 2021, our Didipio operation transitioned from suspension to a resumption of operations. A primary focus was the safe and responsible start-up of operations, proactive engagement with stakeholders and the recruitment and training of approximately 1,000 employees and contractors. For more detail on this see our [Sustainability Report](#).

The resumption of operations at Didipio provided us with an opportunity to work with the Didipio team on particular aspects of our RSCM framework, including:

- Conducting an enhanced review of a sample of suppliers who were identified as potentially high or medium risk in our prior residual risk assessment.
- Holding sessions with our operational teams to talk through practical ways to understand and assess risks.
- Testing template responsible supply chain clauses with a targeted sample of suppliers.



Fire assay at Macraes

Enhanced contract clauses

We are taking a collaborative approach in developing of our RSCM framework. This allows us to take into account operational priorities and needs and incorporate operational feedback during the design of processes and tools. This takes additional time, but the aim is to improve the effectiveness of implementing enhancements or new tools.

Through feedback from our operations, we identified that the development of enhanced responsible supply chain contract clauses was a priority for our work program in 2021.

During the year we worked with external legal advisors and our operational teams, including Responsible Supply Chain Working Group members, to:

- Review existing templates across the Group; and
- Prepare enhanced template clauses which addressed various ethics and compliance risks, including modern slavery.

As part of the development of the template clauses we conducted various engagement sessions with operations to obtain feedback. We also piloted the template clauses with a targeted sample of suppliers at Didipio.

The pilot at Didipio allowed us to obtain feedback from suppliers, including feedback on the modern slavery clauses, to make the templates more effective and clarify expectations.

Third parties

In addition to suppliers, we have policies and processes in place to assess risks relating to investments and joint ventures. This includes due diligence on potential partners, consideration of geographic risk and active engagement with our portfolio companies and joint venture partners.

Our Sponsorship and Donation program supports organisations and initiatives that benefit our local communities and our commitment to be a good neighbour. We recognise that it could, however, be a source of potential modern slavery risk. Before we make a sponsorship or donation, we conduct an initial risk assessment, including consideration of modern slavery risk, and undertake further investigation if red flags are identified.

We have a performance standard in place outlining the requirements and approvals for all sponsorships and donations across the company. That standard is available on our website in our External Affairs and Social Performance Manual.



Employees at Haile

Training

Training and awareness help us to integrate our Human Rights program across our business. Our employees are key to identifying and addressing the risks of modern slavery and our training programs are designed to equip our teams with the knowledge, tools and skills to understand what human rights and modern slavery are.

Since 2019, we have focused on operationalising the [Human Rights Policy](#) and Standard. In 2019 and 2020, our Board, senior management and employees in key roles across the business completed our Foundational Training on Business and Human Rights, delivered by expert external advisors. It included an introduction to human rights, modern slavery and OceanaGold's human rights risks. This training provides a base level knowledge for our people to build upon as OceanaGold becomes more mature in its approach to managing and understanding human rights. This training is delivered on a six-monthly rotation for any new senior management and other employees in relevant functions.

In 2020, we developed an online training module to assist employees in understanding human rights including modern slavery. In 2021, we rolled out this training to employees in roles that could potentially affect the human rights of internal and external stakeholders (a risk-based approach), including people and culture, commercial, legal, health and safety and social performance. As at 31 December 2021, 99% of all eligible employees had completed the training. As part of the continuous improvement process, training modules (undertaken every two years, both in person and online) are updated regularly to ensure the most current and up-to-date information is being shared. In 2022, the training module will be updated to incorporate ongoing feedback from participants and ensure continuous improvement.

Grievance mechanisms and remedy

We recognise the importance of creating and running effective operational grievance mechanisms to:



Help remediate harm for which OceanaGold identifies it has caused or contributed to



Act as an early warning system to prevent escalation and potential outbreak of conflicts



Provide critical information for broader human rights due diligence processes.

In our Human Rights Policy and Standard, we are committed to providing effective grievance mechanisms and will provide for, or cooperate in, remediation where we identify that we have caused or contributed to adverse human rights impacts including modern slavery.

We provide a number of mechanisms for employees, contractors and third parties to raise grievances, which include human rights issues.

Our whistleblower hotline service provides an independent and confidential channel for employees, contractors and external stakeholders (including suppliers and their employees and contractors) to raise concerns including illegal and unethical conduct and serious breaches of our policies, which would include instances of modern slavery. A number of other internal

channels are also available to raise concerns, including Whistleblower Protection Officers. Additional information is available in our [Speak Up Policy](#) and on our [corporate governance](#) webpage.

We also have Complaints and Grievance Mechanisms at each operation to record, monitor and respond to community enquiries, complaints and grievances and take corrective action as required. They have been developed in accordance with the criteria of effectiveness for non-judicial grievance mechanisms in the UN Guiding Principles.

We report annually on the number of notifications through our whistleblower mechanism and our operational grievance mechanisms in our [Sustainability Report](#), available on our website.

During 2021, we continued to improve and assess the effectiveness of our complaints and grievance processes by:

- Participating in training held by Global Compact Australia on implementing effective modern slavery grievance mechanisms to include a human rights lens. Specifically, to effectively manage modern slavery issues. The training provided practical advice on how to design and implement operational complaints processes.
- Developing a new dashboard, reported monthly to the Executive Leadership Team. This included each operation's complaints and concerns for the previous month to summarise the issues raised and how they were being dealt with. This enhanced reporting provides accountabilities are in place to effectively manage and understand the issues being raised.

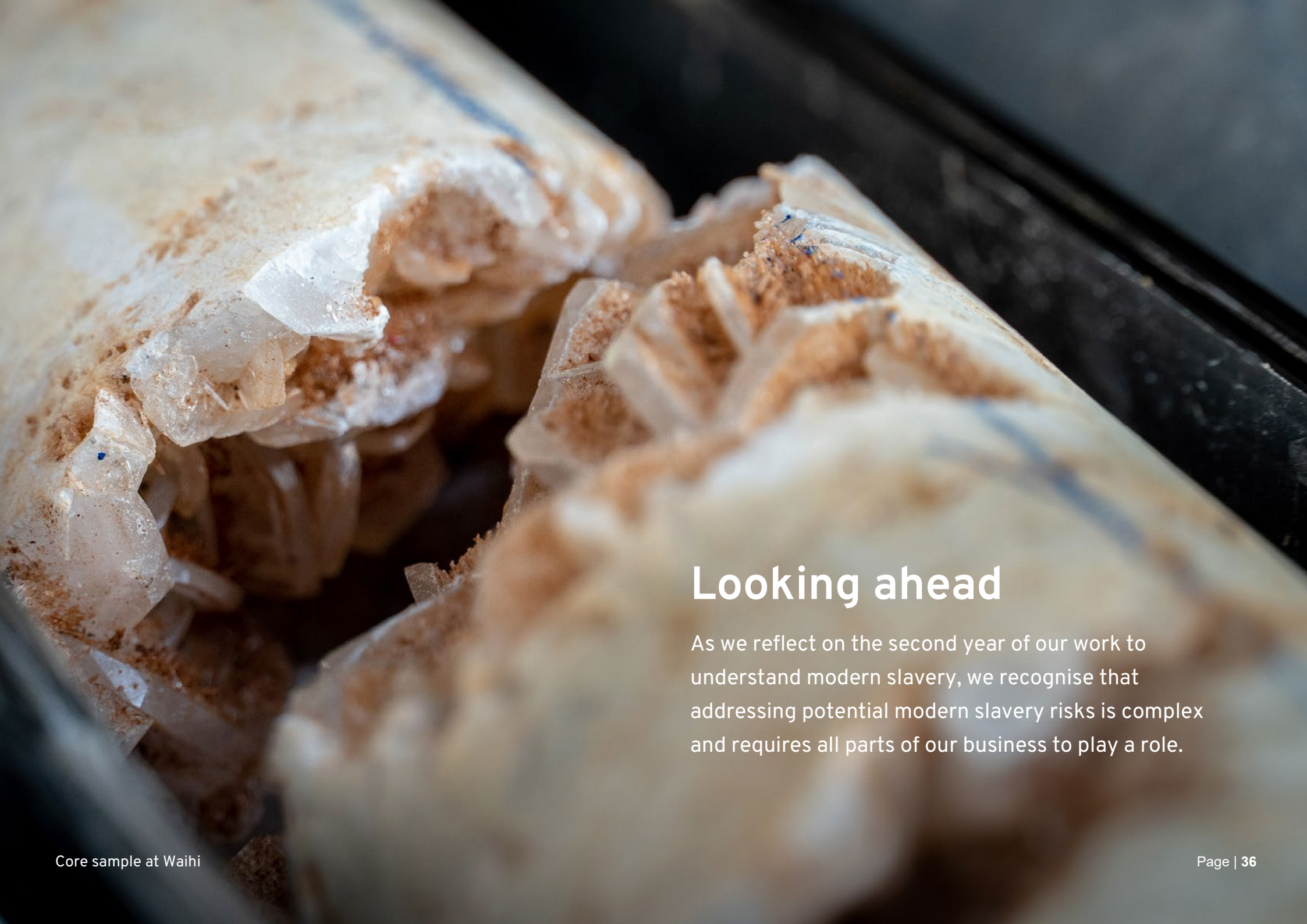
In 2021, there were no modern slavery issues raised through our operational grievance mechanisms.

A high-angle, close-up photograph of a person's hand writing on a clipboard. The hand is holding a blue marker and is positioned over a grid-like document. To the right of the clipboard is a black computer keyboard. In the bottom left corner, a black computer mouse is visible. The desk surface is light-colored wood. The overall scene suggests a professional or industrial setting, likely a control room as mentioned in the caption.

Assessing effectiveness

We are committed to continuous improvement in our modern slavery approach and understand that assessing the effectiveness of our actions is fundamental to this. As we continue to implement our approach to modern slavery, we aim to strengthen effectiveness by monitoring our performance objectives year on year.

2021 objectives	Status	Comments	2022 and beyond objectives
Establish a corporate KPI to track the implementation of HRIA action plans, for 100% close out for the year.		All operations successfully implemented and closed out their first-year actions.	 No 2022 objective required as purpose achieved in 2021.
Track the completion rates of our human rights training and assess feedback from participants.		99% completion as at 31 December 2021 and feedback obtained.	 Update training package to incorporate participant feedback.
Monitor and review complaints received through our grievance mechanisms to identify opportunities to strengthen our approach.		Operations included human rights considerations within their complaints procedures. Participated in training on how to implement effective modern slavery mechanisms.	 Continue training with operations to incorporate learning from external training.
Monitor and review complaints received through our grievance mechanisms to identify opportunities to strengthen our approach.		Developed a new dashboard, reported monthly to the Executive Leadership Team.	 Continue to report on our performance for improved accountabilities.
Develop and test enhanced template RSC contract clauses.		Tested clauses at Didipio as part of the ramp-up of activities in 2021. This included engaging with targeted sample of suppliers, who provided feedback.	 Rolling out our enhanced contract clauses across our operations, including training and guidance.
Continue to test and build RSCM framework.		RSC working group participated in multiple workshops to seek feedback from different areas of the business to understand suitability and effectiveness of proposed framework.	 Continue to test and build RSCM framework.
Seek targeted feedback on our developing modern slavery approach and this statement.		Conducted ad hoc engagement with a targeted sample of suppliers to understand their concerns as processes are enhanced.	 Continue to seek targeted feedback as we implement our responsible supply chain approach.



Looking ahead

As we reflect on the second year of our work to understand modern slavery, we recognise that addressing potential modern slavery risks is complex and requires all parts of our business to play a role.

We are committed to continuously improving our approach and learning year on year about what works effectively.

In 2022, we will continue to progress our program of work including:

- Rolling out our enhanced responsible supply chain contract clauses, and supporting guidance, as part of broader enhancements to our template contracts and PO Terms across all operations.
- Developing and implementing an enhanced, Group-wide inherent risk assessment process for assessing suppliers.
- Assessing our business and IT needs and conducting a review of potential third-party technology solutions to support risk assessment and due diligence of suppliers.
- Developing and launching an enhanced Code of Conduct for the Group and commence developing a Supplier Code.
- Continuous improvement of our whistleblower investigations process.
- Continuing to support the RGMP assurance process.

We also intend to recruit a new role in the Corporate Business Integrity team to provide subject matter expertise and project manage the responsible supply chain program of work.



Corporate Office
Level 3, 99 Melbourne Street
South Brisbane, Queensland
4101, Australia

T: +61 3 9656 5300
E: info@oceanagold.com

www.oceanagold.com

