



POLICY (Board Approved)

Modern Slavery Policy

FNC-POL-25

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APPROVED BY: Board

Date: 13.06.2025

Doc No: FNC-POL-25

Revision No: 1

Revision Date: 22.05.2025

Page: 1 of 9

Approved via Board Memorandum Number: BD-25-06-6.1

Endorsed via Committee Number: ARMC-25-05-5.2

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1.0 Policy Statement

Stanwell has a strong commitment to social responsibility. In formulating and delivering our business strategy, we consider our responsibility to the community, environment and our people. The purpose of this policy is to:

- a. ensure that the goods and services purchased through our supply and value chains are ethical and minimise or eradicate modern slavery risks;
- b. set out the responsibilities of Stanwell, its people, operations and suppliers in observing and upholding Stanwell's position on modern slavery;
- c. provide information and guidance to our people on how to recognise and deal with modern slavery risks; and
- d. support compliance with the *Modern Slavery Act 2018* (Cth) (the Act).

2.0 Scope

This policy applies to Stanwell's directors, employees, contractors and service providers (such as consultants) working for or at Stanwell or its subsidiaries (**our people**), as well as suppliers doing business with Stanwell or its subsidiaries.

Stanwell expects its suppliers to uphold the same standards in their dealings with their own suppliers. We will work in partnership with our suppliers to implement this policy.

3.0 Content

3.1 Ethical standards

Stanwell is committed to complying with all laws related to modern slavery within our operations and supply chains, including ensuring:

- a. employment is freely chosen;
- b. child labour is not used;
- c. a living wage is paid to all individuals;
- d. individuals are not required to work excessive hours;
- e. Stanwell and its subsidiaries promote a no tolerance for discrimination policy; and
- f. there is freedom of association and collective bargaining.

The principle of responsible procurement governs all our procurement activities. All of our people who procure goods, services, consultancy and capital work must meet our standards of integrity, probity, professional conduct and ethical behaviour including:

- a. dealing fairly, impartially and consistently with all suppliers;
- b. maintaining the confidentiality of sensitive information obtained as part of the procurement process;
- c. formally declaring any actual, potential or perceived conflicts of interest prior to the commitment of the procurement activity;

- d. abstaining from any procurement activity where it has been deemed that an actual, potential or perceived conflict of interest exists;
- e. assessing the integrity of the potential supplier, including the original source (where possible) of the product, and evaluating the risk of any harmful labour practices or human exploitation (of any kind) based on the industry, location of the supplier or other factors; and
- f. documenting procurement so as to reasonably demonstrate that decisions and purchases are made in accordance with our procurement policies, other Stanwell policies and applicable laws.

3.2 Dealings with suppliers

Stanwell's approach to modern slavery and responsible procurement, including the expectations set out in this policy, is communicated in writing to all suppliers at the outset of our business relationship with them.

Suppliers must comply with Stanwell's Supplier Code of Conduct, which emphasises Stanwell's commitment to assessing and addressing the risk of modern slavery practices in its operations and supply chains. Stanwell also encourages its suppliers to implement their own binding guidelines for ethical behaviour.

3.2.1 Prohibited business practices

Stanwell requires all suppliers to comply with applicable Australian and international laws. Additionally, suppliers must support internationally accepted standards, treaties and declarations in relation to prohibited business practices, including (but not limited to):

- a. bribery and corruption;
- b. money laundering;
- c. financing terrorism;
- d. breaches of labour standards, including any form of exploitation, involuntary labour or breaches of workers' rights;
- e. breaches of modern slavery legislation including the *Modern Slavery Act 2018* (Cth);
- f. breaches of workplace health and safety laws;
- g. violations of human rights including discrimination in all its forms;
- h. breaches of privacy and data protection obligations;
- i. violations of trade and import rules; and
- j. unfair competition.

3.2.2 Supplier modern slavery requirements

Suppliers are mandated to meet the following requirements before entering into any contract with Stanwell. Suppliers must:

- a. not employ children under the legal age of employment in any country or local jurisdiction:
 - i. if the minimum age of employment is not defined, it will be 15 years of age; and
 - ii. workers under the age of 18 must only perform work in accordance with legal requirements (e.g. with regards to working time, wages and working conditions) and subject to any requirement regarding education or training.
- b. not use any form of forced, bonded, or involuntary labour; all labour must be voluntary:
 - i. workers must be free to join or not to join a union/employee representative body of their choice, free from threat or intimidation;
 - ii. suppliers must recognise and respect the right to collectively bargain in accordance with applicable laws;
 - iii. workers must be allowed to maintain control over their identification documents (e.g. passports, work permits, or any other personal legal documents);
 - iv. suppliers must ensure that workers do not incur any costs, fees, loans or other liabilities related to obtaining employment during the hiring process and employment period;

- v. if any such fee or payment is found to have been made by a worker, the supplier will pay an amount equal to the fee or payment to the worker; and
 - vi. the supplier must be responsible for payment of all fees and expenses (e.g., licences and levies) relating to workers, where legally required.
- c. not engage in punishment and/or mental or physical coercion; disciplinary policies and procedures must be clearly defined and communicated to workers:
 - i. deductions from wages as a disciplinary measure are not allowed unless legally permitted; and
 - ii. even where legally permitted, such deductions should be minimised.
- d. ensure that employment contracts and conditions are provided in terms and in a language clearly understood by the workers; and
- e. comply with all applicable national laws and mandatory industry standards regarding maximum working hours, overtime, fatigue management/days of rest, wages and benefits.

Suppliers must ensure their procurement and sourcing practices are ethical and in accordance with human rights and law. Suppliers are required to:

- a. develop due diligence policies and management systems in order to identify relevant risks in their supply chains;
- b. undertake regular due diligence on their supply chains to determine whether goods and services are sourced from high-risk categories, industries, business models or locations; and
- c. take appropriate steps to mitigate and manage any identified risks.

3.3 Training

All relevant people will receive relevant training at appropriate intervals on how to implement and adhere to this policy.

3.4 When to raise a concern

Stanwell supports and encourages its people to raise genuine grievances about modern slavery matters, whether identified by, or affecting them, in the workplace. Our people and the representatives of our suppliers are required to report any instances that suggest:

- a. that there is a risk, either potential or actual, of modern slavery occurring in the supply chains, activities or recruitment function of Stanwell or its suppliers; and/or
- b. that suppliers or third-party contractors engaged by Stanwell are engaging in potential or actual modern slavery.

3.5 How to raise a concern

To report a concern in relation to modern slavery, including any conduct that may be, or may result in a breach of this policy, you must raise it with the Stanwell Company Secretary. Please

refer to the Whistleblower Protection Policy for further detail on conduct that is 'Reportable Conduct' and how to make a report, including anonymously. Stanwell's people can raise concerns without fear that their future employment prospects will be adversely affected.

If at any time you:

- a. have any questions about the application of this policy; or
- b. need guidance or assistance in a particular case,

You should in the first instance consult the General Manager – Procurement & Supply.

3.6 Related policies

Stanwell has a number of policies and plans that deal with the risk, mitigation and management of modern slavery risks in its activities, operations and supply chains, including:

- a. Supplier Code of Conduct;
- b. Procurement Policy; and
- c. Whistleblower Protection Policy.

4.0 Responsibilities

- a. Stanwell's Board is responsible for approving this Policy and maintains overall accountability for ensuring Stanwell and its subsidiaries comply with legal and ethical obligations.
- b. The Chief Executive Officer, Chief Financial Officer, Chief Operating Officer and Executive General Managers are responsible for providing resources to ensure compliance with legal and ethical obligations.
- c. Management at all levels is responsible for ensuring our people are aware of, understand, and comply with this policy and related documents.
- d. Stanwell's people are responsible for applying this policy when procuring goods, services, consultancy and capital work or extending existing purchasing arrangements.
- e. Stanwell's suppliers are responsible for complying with this policy and their obligations under Stanwell's Supplier Code of Conduct, and for reporting any non-compliance to Stanwell.

5.0 Review, Consultation and Communication

Review:

This Document is required to be reviewed, as a minimum, every 2 years.

Consultation:

The Executive Leadership Team and the Stanwell Board of Directors

Communication/Requirements after Update:

This policy is available electronically in Content Manager and is available on GenNet and the Publication Scheme on Stanwell's website. Updates to this Policy must be communicated to Stanwell's potential and active suppliers.

6.0 References

- *Modern Slavery Act 2018* (Cth)

Document No	Document Title
ASM-STD-SUP-114	Supplier Code of Conduct
ASM-POL-03	Procurement Policy
GOV-POL-29	Whistleblower Protection Policy

7.0 Definitions

Word / Abbreviation	Definition
Modern Slavery	In accordance with the definitions provided in the Modern Slavery Act, that is, including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt

	bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices or engaged in hazardous work.
Modern Slavery Act	Refers to the <i>Modern Slavery Act 2018</i> (Cth).
Our People	Refers to Stanwell's directors, employees, former employees, contractors and service providers (such as consultants) working for or at Stanwell (or its subsidiaries), in your capacity as a director, employee, contractor or service provider of Stanwell.
Stanwell	Refers to Stanwell Corporation Limited and its subsidiaries.

8.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Endorse/Check	Approved By
0	1 September 2023	Policy created	Kam Mudaliar	Catherine Cook	Board
1	22 May 2025	Policy updated and moved to new template	Sharon Ryan	Catherine Cook	Board