

Policy

(Board Approved)



Modern Slavery Policy

Document Number – FNC-POL-25

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, our people, operations and suppliers in observing and upholding Stanwell's position on Modern Slavery; and
- (c) provide information and guidance to our people on how to recognise and deal with Modern Slavery issues.

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 our suppliers to uphold the same standards, including in our suppliers' dealings with their suppliers, and Stanwell will work in partnership with our suppliers to implement this policy.

3.0 Meaning of Modern Slavery

The *Modern Slavery Act* requires all Australian entities or foreign entities carrying on business in Australia that have a consolidated revenue of \$100 million or more, to publicly report on, amongst other things, risks of Modern Slavery in their operations (including investments and financial lending) and supply chains.

Stanwell defines Modern Slavery in accordance with the definitions provided in the Modern Slavery Act, that is, including:

- (a) slavery (the condition of a victim over whom any or all of the powers attaching to the right of ownership are exercised, including where such a condition results from a debt or contract made by the victim);
- (b) servitude (the condition of a victim who provides labour or services including sexual services and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work and are significantly deprived of personal freedom);
- (c) forced labour (the condition of a victim who provides labour or services and because of the use of coercion, threat or deception, they are not free to stop working or leave their place of work);
- (d) deceptive recruiting (the condition of a victim being deceived about whether they will be exploited through a form of modern slavery);
- (e) forced marriage (where coercion, threats or deception are used or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony which causes the victim to marry without their free or full consent);

- (f) debt bondage (the condition of a victim's services being pledged as security for a debt, the debt is manifestly excessive, the reasonable value of the victim's services are not used to liquidate the debt, or the length and nature of the victim's services are not limited and defined);
- (g) trafficking in persons (the recruitment, transportation, transfer, harbouring or receipt of persons, by means of coercion, threat or deception, for exploitation through modern slavery);
- (h) the worst forms of child labour including:
 - (A) where children are exploited through slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage, serfdom and forced or compulsory labour;
 - (B) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
 - (C) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs; and
 - (D) children are engaged in work which is likely to harm their 'health, safety or morals'; and
 - (E) offences relating to use of children for production of child abuse material and to the production, dissemination or possession of child abuse material.

4.0 Content

4.1 Ethical Standards

Stanwell endeavours to ensure that we comply with all laws related to Modern Slavery within our operations, activities and supply chains, endeavouring to ensure:

- (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) entities promote a no tolerance discrimination policy; and
- (f) there is freedom of association and collective bargaining.

The principle of ethical behaviour also governs the conduct of all our procurement activities. All personnel who procure goods, services, consultancy and capital work must comply with the standards of integrity, probity, professional conduct and ethical behaviour including:

- (a) to deal fairly, impartially and consistently with all suppliers;
- (b) to maintain the confidentiality of confidential and sensitive information obtained as part of the procurement process;
- (c) to formally declare any actual, potential or perceived conflicts of interest prior to the commitment of the procurement activity and abstain from any procurement activity where it has been deemed that an actual potential or perceived conflict of interest exists;
- (d) to examine and consider the integrity of the potential supplier, including the original source (where possible) of the product and whether there is 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
- (e) to ensure that the procurement function is documented in such a way as to be able to reasonably demonstrate that decisions and purchases were made in accordance with the procurement policies, and all other Stanwell policies and applicable laws.

4.2 Dealings with Suppliers

Stanwell's approach to Modern Slavery and ethical business standards, including our expectations as set out in this policy, are communicated in writing to all suppliers at the outset of our business relationship with them.

Suppliers are required to 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

chain. Stanwell also encourages our suppliers to implement their own binding guidelines for ethical behaviour.

Prohibited Business Practices

Stanwell requires all suppliers to comply with all applicable Australian and international laws in relation to prohibited business practices, and to 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 or involuntary labour and 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.

Modern Slavery

We mandate that all our suppliers follow the following requirements related to risks of Modern Slavery before entering into any supplier contracts.

- (a) Suppliers must not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it will be 15 years of age. 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) Suppliers must not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The supplier must ensure that workers do not pay fees or make any payment or incur any loans or other liabilities connected to obtaining employment throughout the hiring process and the employment period. If any such fee or payment is found to have been paid by a worker, the supplier will pay an amount equal to the fee or payment to the worker. The supplier must be responsible for payment of all fees and expenses (eg licences and levies) relating to workers, where legally required.
- (c) Punishment and/or mental or physical coercion are prohibited. Disciplinary policies and procedures must be clearly defined and communicated to workers.
- (d) Suppliers must ensure that employment contracts and conditions are provided in terms and in a language clearly understood by the workers. Suppliers must comply with all applicable national laws and mandatory industry standards regarding maximum working hours, overtime, fatigue management/days of rest, wages and benefits.
- (e) Deductions from wages as a disciplinary measure must not be allowed, if not legally permitted and even where legally permitted, should be minimised.
- (f) The workers of the supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. Suppliers recognise and respect the right to collectively bargain in accordance with applicable laws.
- (g) Suppliers must promote an inclusive work environment that values the diversity of their workers. The supplier must not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under applicable laws.

- (h) We expect our suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate to business. Suppliers must comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of workers, safeguard third parties and prevent accidents, injuries and work-related illness. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Workers are to be adequately educated and trained in health and safety issues.
- (i) Suppliers must ensure their procurement and sourcing practices are ethical and in accordance with human rights and law. Suppliers are required to develop due diligence policies and management systems in order to identify relevant risks in its supply chains and undertake regular due diligence on the goods and materials in their supply chains to determine whether goods and materials are sourced from high risk areas associated with child or forced labour, human rights violations and conflict, or are associated with health and safety risks and environmental risks. Suppliers must take appropriate steps to mitigate and manage any identified risks.

4.3 Training and communication

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

4.4 How 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. We encourage our personnel and the representatives of our suppliers to report any instances that suggest:

- (a) that there is a risk, both potential and actual, of Modern Slavery occurring in the supply chain, activities or recruitment function of Stanwell or its suppliers; and
- (b) that suppliers or third party contractors engaged by Stanwell are engaging in, potential or actual Modern Slavery.

If at any time you:

- (c) have any questions about the application of this policy; or
- (d) need guidance or assistance in a particular case,

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

Stanwell seeks to ensure that its personnel can raise concerns without fear that their future employment prospects will be adversely affected. If you wish to report a concern in relation to Modern Slavery, including any conduct that may be a or result in a breach of this policy, you may raise it with the Stanwell Company Secretary.

Please also refer to the Whistleblower Protection Policy for further detail on conduct that is 'Reportable Conduct' under the Whistleblower Protection Policy and how to report conduct under that policy.

4.5 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.

4.6 Guidelines

As a guide, set out in Schedule 1 are some practical guidelines to assist our people in complying with this policy. This list is indicative only and does not address all potential circumstances to which this policy may apply.

5.0 Review, Consultation and Communication

Review:

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

Consultation:

The Executive Leadership Team members 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.

6.0 Definitions

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.

Modern Slavery has the meaning given in section 3.0 of this policy.

Modern Slavery Act refers to the *Modern Slavery Act 2018* (Cth).

Stanwell refers to Stanwell Corporation Limited.

7.0 References

GOV-POL-29 Whistleblower Protection Policy

Supplier Code of Conduct

ASM-POL-03 Procurement Policy

Modern Slavery Act 2018 (Cth)

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

Schedule 1– Modern Slavery Guidelines

Set out below are a number of guidelines to assist our people in complying with this policy. The list is not intended to be exhaustive and is for illustrative purposes only.

1. Always:

- (a) Conduct appropriate due diligence throughout the lifecycle of our engagement with a supplier to address the risks of Modern Slavery in connection with supply.
- (b) Communicate our Modern Slavery requirements for suppliers and ensure that, where appropriate, suppliers are required to confirm their compliance with our Supplier Code of Conduct and the Modern Slavery Act.
- (c) Seek to anticipate and plan in advance for new or potential circumstances where Modern Slavery or risk of Modern Slavery may occur, for example via the introduction of new products, services or suppliers.
- (d) Acknowledge the necessity to prevent, and address risks of, Modern Slavery in our business operations and supply chains when setting key performance indicators (KPIs) and do not penalise individuals and teams for failing to meet KPIs as a result of such compliance. For example, make sure KPIs do not promote a focus on securing the lowest possible costs and rapid delivery times from suppliers as this may inadvertently contribute to Modern Slavery risks.
- (e) Regularly review supplier's compliance with the requirements of our Supplier Code of Conduct.
- (f) Immediately report any indications of Modern Slavery or any concerns you have about risks of Modern Slavery, in our operations and supply chain.
- (g) Ensure all actions taken in the response to any instances of Modern Slavery are in the best interests of the suspected victim or victims.

2. Never:

- (a) Engage in practices of Modern Slavery such as using forced, compulsory or involuntary labour.
- (b) Do anything to enable someone else, including a supplier, agent or representative of Stanwell to engage in or facilitate practices of Modern Slavery.
- (c) Allow detrimental treatment (dismissal, disciplinary action, threats or unfavourable treatment connected with raising a concern) as a result of an employee reporting, in good faith, a suspicion that Modern Slavery may be taking place in any part of Stanwell or its supply chains.
- (d) Attempt to resolve a situation of Modern Slavery yourself.

3. Be cautious of:

- (a) Processes that promote a 'tick box' approach to compliance in lieu of continuous improvement in the management of Modern Slavery risks.
- (b) High risk procurement and recruitment practices, such as engagement with indirect suppliers, employment agencies and sub-contracting arrangements.
- (c) High risk indicators of Modern Slavery in connection with supply, including but not limited to:
 - (i) the industry (i.e. frequent use of unskilled, short-term or temporary labour);
 - (ii) the product or service (i.e. materials reported to involve a risk of labour exploitation);
 - (iii) geography (i.e. goods are made or labour is sourced in a country where there is a risk of labour exploitation); and
 - (iv) the entity (i.e. an entity has been previously reported as noncompliant with labour standards).
- (d) Background information about existing or potential suppliers and their representatives that may indicate the prevalence of improper practices, such as information from international organisations and NGOs regarding human rights and unethical business practices and information related to their reputation, beneficial ownership and qualifications.