

# Modern Slavery Statement

*Evolution acknowledges the Traditional Custodians of Country throughout Australia and Canada and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures; and to Elders past, present and future.*

## About this Statement

Evolution Mining Limited (Evolution) (ABN: 74 084 669 036) is an Australian public company listed on the Australian Stock Exchange (ASX: EVN). The Company is registered at Level 24, 175 Liverpool Street, Sydney, New South Wales, Australia.

Modern slavery is the term used to describe human trafficking, slavery and slavery-like practices such as servitude, forced labour and debt bondage. The International Labor Organization (“ILO”) estimates that illicit profits from modern slavery reached A\$150 billion in 2014, and there are approximately 40 million victims a year.

Our Modern Slavery Statement has been published in accordance with the Australian *Modern Slavery Act 2018* (Cth) (MSA or Act) for the financial year ending 30 June 2020 (FY20). This statement covers the activities of Evolution and all entities within the Evolution Group structure<sup>1</sup>. Each entity is covered by Evolution’s policies, procedures and systems, including those relating to contracting, purchasing and human resources. The modern slavery risks and impacts associated with projects which we do not operate are not included in this statement. We regularly engage with joint venture partners and operators on key issues affecting project outcomes, including human rights and modern slavery<sup>2</sup>.

*This statement was produced by our modern slavery working group and sustainability team and was approved by Evolution’s Board of Directors in November 2020.*

## Modern Slavery Act Criteria

This Modern Slavery Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act. The table below identifies where each criterion is disclosed within this statement.

Modern Slavery Act Criteria	Location
Identifying the reporting entity	Page 1
Letter from the Executive Chairman	Page 2
Describe the reporting entity’s structure, operations and supply chains	Pages 4 - 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 6 - 9
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pages 7 - 9
Describe how the reporting entity assesses the effectiveness of these actions	Page 9
Describe the process of consultation with any entities that the reporting entity owns or controls	Pages 1, 4 - 5
Other relevant information about this statement:	Pages 4, 9

<sup>1</sup> See Evolution’s [2020 Annual Report](http://www.evolutionmining.com.au) for a listing of all entities available at [www.evolutionmining.com.au](http://www.evolutionmining.com.au)

<sup>2</sup> <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>

## Letter from the Executive Chairman

On behalf of the Evolution Board of Directors, I am pleased to release our first Modern Slavery Statement. This statement articulates the steps we have taken to mitigate the risk of modern slavery and human trafficking within our business and supply chains and is aligned with the Act, to 30 June 2020.

Evolution has consistently integrated sustainability into the way we do business. Every decision we make has our sustainability vision as an integral part of our purpose to “deliver long-term stakeholder value through safe, low-cost gold production in an environmentally and socially responsible manner.”

Modern slavery has long-lasting impacts on affected individuals and communities around the world. Evolution has zero tolerance to all forms of modern slavery, and we have taken steps to understand these risks within our business and supply chain to ensuring ongoing management of these risks.

Respecting the human rights of individuals in our supply chain is an important element of our business and sustainability principles. The alignment of our Sustainability Policy, Standards, Principles and the 2020 Sustainability Report with the United Nations’ (UN) Sustainable Development Goals (SDGs) and UN Guiding Principles on Business and Human Rights demonstrates the commitment from the Evolution Board to delivering economic benefits to all our stakeholders in a socially responsible manner. We believe this is core to our values and how we lead our business.

As a company with global supply chains, we embrace our responsibility to understand all guises of labour exploitation and to effectively address it in our supply chain. The recent update to our “Supplier Code of Conduct” and “Procurement Statement”, 2020, are fundamental in communicating to suppliers our expectations on social responsibilities within their supply chains. This has set the foundations for enhanced supply chain due diligence throughout our business.

Taking action on modern slavery is a challenging and evolving process. Success requires collaboration with our supply chain partners, joint venture partners, industry bodies, governments and the communities in which we operate. Disclosure of the findings requires leadership and courage from business and a genuine commitment to uncover and eliminate modern slavery when incidents are identified.

Our goal in the Statement is to share our approach, our successes and the challenges faced in implementing our modern slavery due diligence. We hope our transparency will help other companies learn from our experiences, as they implement their own approaches. We welcome feedback and look forward to continuing to work with our stakeholders to positively address this serious issue.

Yours faithfully



**Jake Klein**  
Executive Chairman



## **FY20 highlights**

**Modern slavery risk identification commenced through supplier high-risk mapping and due diligence**

**Rollout of an MSA awareness and education pack to each Evolution site**

**Revision of procurement market engagement materials to address MSA compliance**

**New supplier onboarding process developed to identify potential modern slavery risks in our supply chain**

**Development of a Supplier Code of Conduct**

**Development of a supplier assessment questionnaire and issuance to potential high-risk suppliers**

**Commenced supplier engagement and training to raise awareness of modern slavery and improve supply chain transparency**

## A Business with Purpose

Evolution is a leading, growth-focused Australian gold miner operating five wholly-owned mines – Cowal in New South Wales, Mt Carlton and Mt Rawdon in Queensland, Mungari in Western Australia, and Red Lake in Ontario, Canada. In addition, Evolution holds an economic interest in the Ernest Henry copper gold mine in Queensland.

Evolution has made a strategic decision to operate in the Tier 1 mining jurisdictions of Australia and Canada, where community support, our social licence to operate and the contribution we can bring to our communities are amongst our most valuable assets.

In FY20, we produced 746,463 ounces of gold, generated A\$1.9 billion in gold income and contributed A\$955 million in payments to suppliers, A\$191 million in wages, A\$182 million in royalties and taxes, A\$12 million in interest and A\$221 million in dividends.

We are focussed on operating our assets safely and efficiently and developing them to their full potential. Of our 2,099 employees, contractors and labour hire, 50 work in our supply teams. Our supply chain is large and complex, with approximately 7,000 vendors in Australia and 800 vendors in Canada.

We source a wide variety of goods and services including electricity, gas, fuels, lubricants, chemicals, grinding media, steel, piping, parts, fleet, drilling, blasting, safety wear and equipment, professional services, technical consultants and contract labour.

The steps we are taking to address modern slavery helps our stakeholders have confidence that our commodity has been produced and sold respecting human rights. These are aligned with our values of Safety, Excellence, Accountability and Respect, that support our vision of inspired people creating a premier global mid-tier gold company.

## Sustainability Principles

The objective of our sustainability efforts is to deliver long-term stakeholder value through safe, low-cost gold production in an environmentally and socially responsible manner.

Evolution has nine Sustainability Principles<sup>3</sup> that provide the foundation for how we approach and integrate sustainability into everything we do. These principles align with the United Nations Sustainable Development Goals and support our drive for improvement as we mature in our sustainability journey, which includes Human Rights. More information on our sustainability principles, strategy and performance please refer to the 2020 Sustainability Report which can be found [here](#).

## Corporate Governance

We comply with the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations (4th Edition)* unless disclosed otherwise. Our full Corporate Governance Statement is available on our website<sup>4</sup>.

Our Code of Conduct<sup>5</sup> applies to Directors, all employees, contractors and consultants employed to undertake work on behalf of or for Evolution and its subsidiaries.

All employees, contractors and service providers are required to operate and behave in accordance with Evolution's values of Safety, Excellence, Accountability and Respect. In FY20, all employees completed 'Respect & Dignity' training that included a section on the Code of Conduct.

## Risk Management, Policies, Standards and Procedures

Evolution is committed to the protection of human rights and the prevention of modern slavery. This is underpinned by our risk-based decision approach that is supported by the Sustainability and Strategic Planning Policies, Standards, Risk Management Framework and associated site processes and procedures. These align with the principles of Australian and international standards and guidance and are designed to identify impacts and adopt preventative measures. Contained within these is our Human Rights Standard that defines the

---

<sup>3</sup> <https://evolutionmining.com.au/sustainability/>

<sup>4</sup> <https://evolutionmining.com.au/corporate-governance/>

<sup>5</sup> <https://evolutionmining.com.au/empl-code-conduct/>

minimum requirements in relation to respecting human rights, including identifying and mitigating potential threats to human rights. It includes the following performance requirements:

- Conduct a risk based Human Rights Impact Assessment and develop a process to screen and regularly monitor business partners and other stakeholders engaged by Evolution to identify actual or potential human rights impacts, including modern slavery
- Implement induction awareness training of human rights responsibilities for senior management, employees, business partners and other relevant stakeholders

Matters relating to sustainability, including human rights, are recorded in a database and communicated widely across the organisation dependent on the issue. These are reviewed regularly across the business including by the Board Risk and Sustainability Committee<sup>6</sup>, supported by the site leadership teams, subject matter experts and the Leadership Team to ensure effectiveness of the management of those risks.

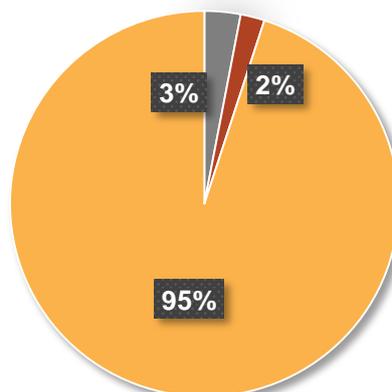
## Supply Chain

Our goal is to create sustainable value for our shareholders, employees, and social partners through safe and responsible mining practices. We work across the full spectrum of the mining value chain and are mindful of the impact our activities may have on the communities and environments in which we operate.

We are committed to supporting local suppliers and contractors that have businesses in the regions in which we operate. Our procurement teams actively source from local suppliers and contractors and include them in sourcing activities where their technical skills and capability are assessed to meet our business requirements. We also encourage large contractors to develop local facilities and partnerships to build capacity locally, resulting in employment opportunities and a transfer of skills.

Our total expenditure to the Australian and Canadian economies in FY20 was A\$1.56 billion, with A\$955 million in payments being made to suppliers and A\$79 million in direct spend with our local suppliers and contractors supporting our Australian operations. The Red Lake operation was acquired in April 2020 and therefore the spend analysis is only for one-quarter of the financial year.

**FY20 Percentage spend by source**



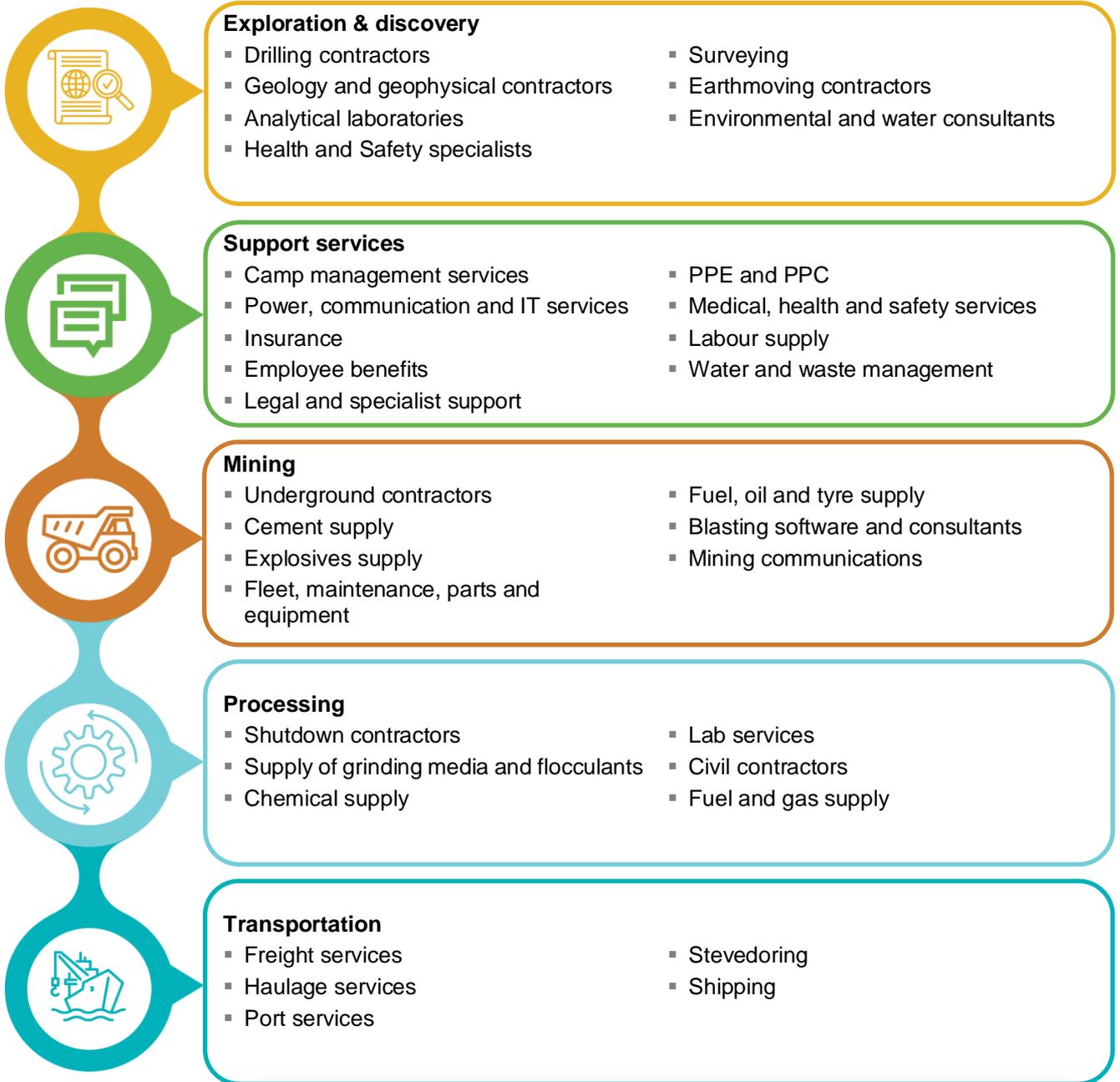
■ International   ■ International-Red Lake   ■ Australia

***FY20 Tier 1 Supplier Jurisdictions:***

Australia (95%)  
 Canada (2%)  
 Other International: United States of America, United Kingdom, China, Switzerland, Philippines, Singapore (3%)

<sup>6</sup> <https://evolutionmining.com.au/risk-sustain-charter/>

## Evolution supply chain



## Identification, Assessment and Mitigation of Modern Slavery Risks

Evolution is aware of the risk of modern slavery in our Tier 1 supplier supply chains and the need to be vigilant in identifying where there is the potential to cause, contribute to, or be directly linked to modern slavery activities.

### Operational and Supply Chain Risks

The mining industry in Australia and Canada is not considered to be high risk for modern slavery<sup>7</sup>, with the most relevant areas for human rights within our operations being personal protective equipment (PPE), labour conditions, and the rights of first nation peoples and communities where we operate. We understand that

<sup>7</sup> <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>

companies can inadvertently elevate the risk of human exploitation by placing unreasonable demands on suppliers. This is considered when engaging with suppliers.

We recognise that our Australian suppliers (who make up 95% of our supplier spend) provide us with goods and services across various categories with various inputs to their supply chains which may be sourced from known potential high-risk areas and therefore will require further engagement and assessment.

Our approach to assessing supply chain risk is based on product, sector, geographic and entity risks. The supply team undertook risk and high-level desktop assessments of Tier 1 suppliers across the following spend categories: chemicals, tyres, lime and cement, fuel, grinding media, lubricants, personal protective clothing and equipment. The assessment incorporated industry, location of materials sourced and spend data. This initial work provided a high-level snapshot of our Tier 1 supplier risk profile. Over the next 12 months, Evolution will undertake a more comprehensive assessment of Tier 1 suppliers to stratify our suppliers according to risk and identify suppliers for further engagement.

The typical goods and services of a hard rock mining business include:

- Electricity
- Gas and Fuel
- Chemicals
- Grinding media
- Steel fabrication
- Contract mining
- Fixed plant and equipment
- Explosives and blasting services
- Exploration and production drilling
- Transport and logistics
- Personal protective equipment and clothing
- Camp services
- Civil construction
- Laboratory services
- Mobile fleet and machinery
- Shut and maintenance services
- Professional and technical services
- Labour hire

### ***Procurement Policy and Supplier Environmental, Social and Governance (ESG) Assessment***

Evolution's Procurement Policy sets out how Evolution is to carry out procurement activities and is aligned to our Values, Code of Conduct and the recently published Supplier Code of Conduct. It considers various ESG factors that are integrated into our market engagement procurement activities and new vendor onboarding process. This includes the potential risk of modern slavery as part of our tender evaluation and onboarding process. Focus areas include environmental performance, local and Indigenous sourcing, modern slavery, health and safety and support for the workforce, contractor management, compliance and governance. Suppliers are expected to have a similar focus on governance and sustainability obligations.

Our business recognises that significant social benefits can be achieved through sourcing goods and services locally where we operate and is committed to evaluating local supply options as part of our overall sourcing strategies. Suppliers are encouraged to assist in the achievement of these objectives through local and Indigenous programs and skills transference and are expected to maintain sourcing strategies that respect human rights, rights to life, liberty, security and safety of persons in their supply chains.

### ***Supplier Code of Conduct***

In 2020, Evolution reviewed and updated its Supplier Code of Conduct, which sets out our expectations on suppliers when doing business with us. It recognises that we and our suppliers operate in diverse locations around the world and as global citizens, we each have an obligation to act responsibly, lawfully and with the upmost integrity wherever we do business. Suppliers may periodically be audited or required by Evolution to certify or provide information relevant to their compliance with the Code of Conduct.

A copy of this document is available on our website at [www.evolutionmining.com.au](http://www.evolutionmining.com.au) and is also made available to new contractors and suppliers in Australia during the onboarding process.

### ***Strengthening Supplier Contracts***

One of the ways in which we articulate our human rights expectations and control the potential risk of modern slavery arising in our supply chain is through our contracting process with our Tier 1 suppliers. Modern slavery specific provisions have been incorporated in our procurement contracts and vendor trading terms.

Our supplier contracts require compliance with stringent safety, environment, social criteria and adherence to our policies and standards. Through regular supplier relationship meetings and key performance indicator reporting, we monitor ongoing compliance and performance.

This was evidenced through the response to the pandemic where there was also added focus with regard to supply chain assurance and sourcing of personal protective equipment (PPE) for our business. The Evolution crisis management team assessed at risk supply chains and increased communication to manage any exposures to the potential risks of supply disruptions. Measures were put in place to mitigate the risk of transmission of COVID-19 into our operations and we have worked with our suppliers to instigate controls to manage potential exposure to the virus. Evolution has existing relationships with most of these suppliers which helped to manage the risk of new supply chains with unknown risk of modern slavery.

### *Market Engagement Evaluation Criteria*

Market engagements are issued via our tender management digital platform through which questions are provided to potential suppliers for them to complete and the Evolution evaluation team to review and score. The questions are designed to provide insight to the ESG practices of potential suppliers and assess their organisational fit with our business and our Values and expectations.

### *Supplier Assessment Questionnaire and Vendor Process*

Evolution has developed a Supplier Self-Assessment Questionnaire (SAQ). The SAQ supports the identification of modern slavery risks and fosters collaborative efforts with our suppliers to identify risks, improve supply chain transparency, and provide areas for further due diligence. It is also designed to educate suppliers of the importance of modern slavery legislation and requests responses to a series of questions which help to identify the geographic locations of their business operations, assess the risk of potential for modern slavery in their supply chains, determine the level of governance within their business and the training needs required to make their workforce aware of modern slavery risks.

Existing vendors have been issued with this SAQ via our contract management digital platform. This was initially conducted on a trial basis of the top 25 suppliers and has now been progressively rolled out to our vendors with contracts in place, with responses received from 170 of our key suppliers. Where a risk has been flagged direct engagement with the vendor will be undertaken to further assess the risk of modern slavery and may result in a request for further information and discussion on the findings.

### *Supplier Engagement and Development of a Remediation Plan*

We engage with our suppliers both formally and informally, including onsite visits by our teams, surveys and structured meetings. These engagements are a valuable insight into the experience of workers and aim to validate information supplied. We set corrective actions from these engagements and the findings are used to inform and improve our future due diligence assessments for current and potential suppliers, using a risk-based approach:

- During pre-qualification, the tendering process, or at the renewal of an existing contract term as formal risk assessment is conducted for all our suppliers
- Based on the risk assessment, suppliers may be required to supply additional information
- Further due diligence may occur, including the use of third-party verification of supplied information

If a potential risk of modern slavery is identified, we initially discuss the issue with the supplier and request a formal response and, if required, the provision of further information. Evolution is prepared to work with our suppliers to determine the appropriate corrective actions and to monitor those actions until both parties agree that the risk of modern slavery is being appropriately mitigated.

Whilst we have identified potential modern slavery risks in some of our supply chains, the relevant suppliers have provided satisfactory assurances and corrective measures have not been required.

Evolution continues to build relationships and work with organisations to address modern slavery risks across our shared supply chains. We also reserve the right to suspend, discontinue or terminate relationships with suppliers when we have reason to suspect or can identify that the supplier:

- Is in breach of the law
- Refuses or fails to demonstrate reasonable and timely efforts to implement agreed corrective actions required to operate in accordance with our Supplier Code of Conduct

### *Due Diligence and Continual improvement*

Continual improvement and ongoing review and assurance of the management of modern slavery is part of the integrated approach to the management of risk at Evolution.

## Assess Effectiveness

We have built on our understanding of potential modern slavery risks in our operations and supply chain. Through consultation with external human rights and sustainability specialists, we have undertaken several key activities which form the basis of our modern slavery action plan and supplier risk assessment process. These activities include:

**Modern slavery awareness:** We have worked to educate our business in the risk of modern slavery and how to identify the potential threat. An education pack has been developed and presented to personnel involved in procurement activities and bringing new vendors into the business. This approach will continue to be reviewed and improved in future years as our knowledge and awareness of modern slavery matures.

**Supplier risk identification and prioritisation:** We have reviewed our highest spend suppliers against modern slavery risk indicators and have identified high risk procurement categories. This enables us to focus our supplier due diligence on the highest risk suppliers.

**Supplier meetings:** We conduct scheduled and regular on-site meetings with our suppliers to ensure both they and their supporting supply chain are meeting our agreed standards. We have discussed the introduction of the modern slavery legislation, and where required, we requested that they provide supporting evidence of the actions their business is taking to address the modern slavery risk.

**Supplier surveys:** We continue to conduct more extensive due diligence of our highest priority suppliers through the SAQ process. Analysis of supplier responses inform our requirements for continued engagement with, and risk management expectations of, these suppliers. We value the partnerships we have formed with our suppliers and continue to work with them to effectively assess and address the modern slavery risks and impacts.

**Education and Training:** We will deliver additional modern slavery risk-based training to our senior operations leaders and procurement staff.

## Looking Ahead

Through our working group in FY21, we continue to monitor the progress of our modern slavery actions and due diligence processes. We plan to further develop and educate the members of our internal working group. This comprised of representatives from the areas of Commercial, Risk, Audit, Sustainability and People & Culture. This group is pivotal to reinforcing the importance and awareness of the risk of modern slavery in our business, and in responding if any risks are identified.

### *Key actions planned in FY21*

- Review and improve our due diligence, risk management, training and supplier engagement systems and processes with respect to the modern slavery risks
- Work with the high priority Tier 1 suppliers to improve our understanding of their supply chains
- Commence mapping the next tier of suppliers against geographic, commodity and industry modern slavery risk indicators
- Continue to embed an awareness of the risk of modern slavery with our existing suppliers and new vendors being brought into our business
- Enhance appropriate monitoring and assurance to further assess the effectiveness of the management of modern slavery risks in our supply chain.

Modern Slavery Statement FY20	Version control: 1.0	Issued: 01/12/2020
Review date: 01/12/2021	Owner: Fiona Murfitt VP Sustainability	Approver: Jake Klein Executive Chairman