



RESPECTING HUMAN RIGHTS

MODERN
SLAVERY
STATEMENT
2021



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See our reporting suite at <https://www.south32.net/investors-media/investor-centre/annual-reporting-suite>, including the:

Sustainable Development Report

An overview of how our business-wide processes support our sustainability objectives and how we manage our key sustainability topics.

Sustainability Databook

Our supplementary reporting tool containing metrics and additional sustainability information.

Annual Report

Comprehensive information on our activities and financial performance throughout FY21.

Corporate Governance Statement

Our corporate governance practices and a description of our approach to responsible and ethical behaviour.

Tax Transparency and Payments to Governments Report

Transparency on our approach to payments of taxes and contributions to governments where we operate.

www.south32.net

ACKNOWLEDGEMENT

We acknowledge and pay our respects to the Indigenous and Tribal Peoples of the lands, waters and territories on which South32 is located and where we conduct our business around the world.

We respect and acknowledge the unique cultural and spiritual relationships that Indigenous and Tribal Peoples have to the land, waters and territories, and their rich contribution to society.

In the spirit of respect and reconciliation, we will continue to support initiatives that strengthen culture and ways of life so that their legacy continues and extends to future generations.



SOUTH32 IS A GLOBAL MINING AND METALS COMPANY

We produce bauxite, alumina, aluminium, metallurgical coal, manganese, nickel, silver, lead and zinc at our operations in Australia, Southern Africa and South America. With a focus on growing our base metals exposure, we also have two development options in North America and several partnerships with junior explorers around the world.

Making a difference

Our **purpose** is to make a difference by developing natural resources, improving people's lives now and for generations to come. We are trusted by our owners and partners to realise the potential of their resources.

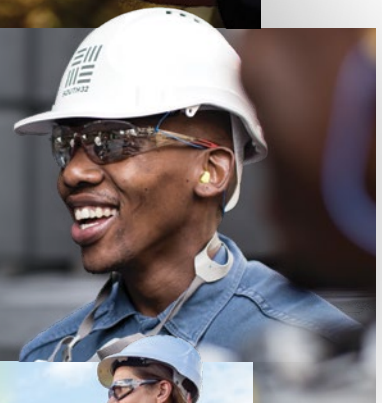
[See some of the ways we make a difference in our Sustainable Development Report](#)



Optimise, Unlock, Identify

Our purpose is underpinned by a simple **strategy** which is focused on optimising the performance of our operations, unlocking their potential and identifying new opportunities to create value for all our stakeholders.

[Read more about our strategy in our Annual Report](#)



Care, Trust, Togetherness and Excellence

While our strategy outlines what we do to achieve our purpose, our **values** of care, trust, togetherness and excellence guide how we do it. Every day, our values shape the way we behave and the standards we set for ourselves and others.

[Learn more about our people in our Sustainable Development Report](#)



Reporting entity

In line with Section 14(b) of the Australian *Modern Slavery Act 2018* (Cth), we produce one statement that responds to both the Australian *Modern Slavery Act 2018* (Cth) requirements and the UK *Modern Slavery Act 2015* (against which we report on a voluntary basis).

The submitting entity is South32 Limited (ABN 84 093 732 597) as the parent company of the South32 Group of Companies and its registered office is Level 35, 108 St Georges Terrace, Perth, Western Australia 6000. South32 is listed on the Australian Stock Exchange, the London Stock Exchange and the Johannesburg Stock Exchange. South32 Limited qualifies as a reporting entity under the Australian *Modern Slavery Act 2018* (Cth).

The following entities also meet the reporting test set out in the Australian *Modern Slavery Act 2018* (Cth): Dendrobium Coal Pty Ltd, Endeavour Coal Pty Ltd, South32 Aluminium (RAA) Pty Ltd, South32 Aluminium Worsley Pty Ltd, South32 Cannington Pty Ltd, Illawarra Coal Holdings Pty Limited and operated joint venture Groote Eylandt Mining Company Pty Ltd. In this statement, unless expressly mentioned otherwise, references to South32 and the South32 Group, the Company, we, us and our, refer to South32 Limited, its subsidiaries and its controlled entities and South32 operated joint operations as a whole. This statement does not cover our non-controlled nor non-operated joint ventures operations.⁽¹⁾

Consultation

Our corporate governance and risk management framework (which includes the policies, standards, procedures and tools through which modern slavery risks are assessed and managed) is developed centrally by the South32 Board, Lead Team and management and applied across the South32 Group, including at our operated joint ventures. Operations in the South32 Group and operated by South32, as well as South32 functional teams, implement modern slavery risk management processes across South32 by undertaking risk identification, reporting and training as described in this statement. This statement has been prepared with input from, and in consultation with, South32 Lead Team and management representatives responsible for overseeing this work across the South32 Group (including our reporting entities and their controlled entities). For further information on our corporate governance practices, Board, Committees, and risk management and internal controls, please refer to our Corporate Governance Statement.

Our approvals⁽²⁾

This statement was endorsed by the Sustainability Committee and approved by the Board of South32 Limited on 2 September 2021.



Graham Kerr

Chief Executive Officer, South32 Limited

Date: 2 September 2021

- (1) Disclaimer: This document has been prepared by South32 Limited and its controlled entities and South32 operated joint operations for reporting under the Modern Slavery Act 2018 (Cth) and disclosure on South32's website in relation to its actions during the period 1 July 2020 to 30 June 2021 and its financial position as at 30 June 2021. South32 has prepared this document based on information available to it at the time of preparation. The information contained in this document is general in nature, and does not purport to be complete. This document should be read in conjunction with South32's 2021 Annual Report, 2021 Sustainable Development Report and 2021 Corporate Governance Statement and other periodic and continuous disclosure announcements lodged with the ASX, which are available at www.south32.net. Except as required by applicable laws or regulations, the South32 Group does not undertake to publicly update or review any forward-looking statements, whether as a result of new information or future events. South32 Limited shares trade on the ASX, JSE and LSE under the listing code of S32. Monetary amounts in this document are reported in US dollars, unless otherwise stated. Metrics describing performance apply to 'operated operations' that have been wholly owned and operated by South32, or that have been operated by South32 in a joint venture operation, from 1 July 2020 to 30 June 2021. Unless otherwise stated, operations that we divested during the reporting period are shown for the period up until we ceased operational control of those operations (being 31 December 2020 for Tasmanian Electro Metallurgical Company (TEMCO) and 31 May 2021 for South Africa Energy Coal (SAEC)).
- (2) Mandatory criterion outlined in sections 16(1)(a) and 16(1)(f) of the Australian *Modern Slavery Act 2018* (Cth).



“
All human beings are born free
and equal in dignity and rights”

Article 1, Universal Declaration of Human Rights

Introduction

As a business with a large and complex global supply chain and operations and projects across Australia, Southern Africa and the Americas, we recognise that modern slavery is a real risk. We are committed to respecting human rights and taking meaningful action against modern slavery. Not only is this the right thing to do and central to our purpose and values, but it is critical to the integrity and success of our business. Addressing modern slavery risks in our operations and supply chain requires collaboration and we work closely with our stakeholders to continually evolve our approach.

In FY21 we finalised “Our Approach to Human Rights” - a set of 13 guiding principles. Each principle is important in addressing risks of modern slavery, but the most relevant are:

- We will work to reduce the risk of modern slavery within our operations and supply chains, including human trafficking, forced, bonded or involuntary labour, and child labour.
- We will support the rights to freedom of association and collective bargaining, provide decent work and work towards embedding a living wage.
- We will provide and maintain a safe workplace and create and maintain a work environment free from discrimination and harassment.
- We will provide accessible and safe grievance and redress channels for stakeholders to raise complaints about human rights, and where we have caused or contributed to an adverse human rights impact, we will provide for or cooperate in remediation through legitimate processes.
- We will communicate these principles and our human rights expectations to relevant stakeholders.
- We will conduct regular human rights training for employees and contractors, and where possible, extend these to our suppliers and interested stakeholders.
- We will track the effectiveness of our processes to continually improve our approach and embed human rights across the business, and publicly report our progress.

The COVID-19 pandemic continued to impact our modern slavery assessment processes during FY21. Due to border controls and travel restrictions we had less opportunities to conduct in-person supplier audits. The audits that could not be completed will be prioritised for FY22. The pandemic also exacerbated risks for seafarers, which we helped to mitigate through various initiatives.

Modern slavery is not acceptable in our operations or supply chains. Although we have found no instances of modern slavery during FY21, this statement outlines our approach to further reduce the risk of modern slavery in our operations and supply chains.

	Key performance updates in FY21	Page
 DUE DILIGENCE	Implemented a third-party supplier screening platform (EcoVadis) and mapped 5,354 suppliers for modern slavery country and industry risks, as per EcoVadis criteria.	11
	Invited suppliers, based on risk and commercial relationships, to complete the EcoVadis in depth supplier assessment, which includes both modern slavery and broader sustainability assessments.	12
	Completed 14 independent supplier audits.	13
	Completed Industry Supplier Self-Assessment Questionnaire (“SAQ”) pilot. 595 suppliers have completed the SAQ.	10
	Signed the Neptune Declaration and conducted human rights due diligence on seafarer welfare across the ports where we operate.	13
	Completed an independent shipping audit and agreed a development plan with the ship owner.	13
 EMPOWERMENT AND REMEDIATION	Updated modern slavery training completed by over 1,000 employees and contractors.	15
	Trained 125 supply companies and developed a new supplier training strategy.	15
	Developed an Industry Remediation Action Plan with the Western Australian Modern Slavery Collaborative Group (“WAMSc”).	16
 MONITORING AND EVALUATION	Launched updated Sustainability and Business Conduct – Minimum Supplier Requirements.	17
 COLLABORATION	Contributed to the WAMSc, Sustainable Shipping Initiative and United Nations Global Compact Network of Australia Modern Slavery Community of Practice.	18

This is our sixth modern slavery statement. In addition to our FY21 progress update, Appendix 2 summarises the key performance indicators from our three most recent modern slavery statements to demonstrate progress made on identified risks and assessment processes, and in Appendix 3, we report on performance against our targets and commitments. We intend to publish data and analysis every three years, including year-on-year comparisons, to give our stakeholders visibility of our progress and show any changes in our approach.

OUR DIVERSIFIED PORTFOLIO

At South32 we believe that, when done sustainably, the development of natural resources can change people's lives for the better.

- Office
- Upstream operations
- Downstream processing facilities
- Development option
- Exploration partnership/project
- South32 investment



Revenue
US\$6,337m

Employees
9,074

Listed on
ASX (primary),
JSE (secondary)
and LSE (standard)

(3) Mandatory criterion outlined in section 16(1)(a) and (b) of the Australian *Modern Slavery Act 2018* (Cth).
 (4) This map reflects our controlled entities and South32 operated joint operations which are covered by this statement. This statement does not cover our development options, non-controlled nor non-operated joint ventures. For further information see page 2.
 (5) During FY21, we divested our interest in SAEC and the TEMCO manganese alloy smelter.

Our commodities

We produce alumina, aluminium, ferronickel, silver, lead and zinc, which have applications in construction, transport, consumer goods, renewable energy generation and battery storage and we mine metallurgical coal and manganese ore which are used to produce steel. We have operations and development options in Australia, Africa and the Americas and a geographically diverse customer base.

Discover more about [our business model](#) on page 6

Portfolio outlook

We are actively reshaping our portfolio to increase our exposure to the base metals critical in the transition to a low-carbon world. In addition, we are building our pipeline of opportunities by investing through the drill bit. We currently have more than 20 greenfield exploration partnerships and projects targeting base metals around the world.⁽⁵⁾

Discover more about [our strategy](#) on page 12 of our Annual Report



Our business model

CREATING LONG-TERM VALUE

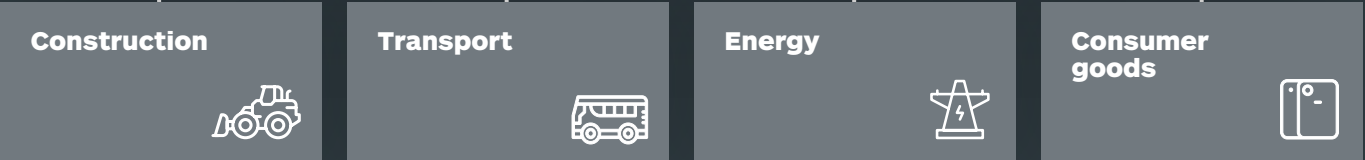
As a global mining and metals company, we create value by producing commodities that are used in all aspects of modern life. Our operations, development options and exploration projects and partnerships are diversified by commodity and geography. We work to minimise the impact of our operations and aim to create enduring social, environmental and economic value.

Our pipeline of development options and early stage exploration partnerships is central to our strategy to reshape and improve our portfolio to create long-term value.

Our operations focus on safe and reliable production, minimising their impact and continually improving their competitiveness.



Our marketing team generates revenue from the sale of our commodities and purchases raw materials from global markets. They also build a view of commodities and their markets that informs our strategy, business planning and investment decisions.



Our strategy guides how we optimise our business, unlock its full value and identify ways to create value for all stakeholders.

⁽⁶⁾ We mine and refine bauxite to produce alumina; we mine and smelt nickel ore to produce ferronickel.

Mine

Manganese ore and metallurgical coal are used to produce steel for construction of buildings and infrastructure. Manganese is also required for steel recycling. We are the world's largest producer of manganese ore from our operations in Australia and South Africa.

We produce premium hard coking coal from Illawarra Metallurgical Coal in Australia and supply approximately two per cent of the seaborne market as well as the domestic steel industry.

Lead, silver and zinc from our Cannington mine have a range of applications. Approximately 65 per cent of global lead production is used in batteries. Silver is widely used in solar power and electronics and zinc protects steel from corrosion.

Refine

Alumina is the key raw material used to produce primary aluminium. Worsley Alumina and Brazil Alumina mine and refine bauxite which is used to produce alumina. Approximately 60 per cent of the production from Worsley Alumina is shipped to our aluminium smelters in South Africa and Mozambique, with the remainder going into the seaborne market. Worsley Alumina is one of the world's largest alumina refineries.

Smelt

Aluminium is often referred to as the metal of the future. It is lightweight, durable, strong, resistant to corrosion, and recyclable and it can conduct electricity, meaning it has a wide range of applications including construction, electrical wiring, transportation, packaging and consumer goods such as electronics and household items. Hillside Aluminium in South Africa is the largest aluminium smelter in the southern hemisphere.

Cerro Matoso mines nickel ore which is smelted in electric arc furnaces to produce ferronickel. The majority of ferronickel is used to make stainless steel for household items, surgical instruments and vehicle parts.

Our commodities in a low-carbon future



FROM MINE TO MARKET



Our supply chains are complex and dynamic networks spanning 46 countries and comprising more than 5,000 direct suppliers. Our suppliers are critical partners for our business and relationships with them vary from once-off engagements through to long-term contractual agreements, as guided by supplier management plans and contract management procedures.

We source a diverse range of goods and services through our upstream supply chain⁽⁹⁾. Our primary spend categories are:

- Mobile equipment and their parts;
- Raw materials;
- Engineering and construction;
- Fuel and explosives;
- Electronics and electrical equipment;
- General industrial equipment and consumables;
- Logistics (air, road and rail), shipping, and freight;
- Energy, gas and utilities;
- Support material and services; and
- Technology.

5,668

direct suppliers in 46 countries⁽⁸⁾

paid over

US\$5 billion

to our suppliers

(7) Mandatory criterion outlined in section 16(1)(b) of the Australian *Modern Slavery Act 2018* (Cth).

(8) SAEC suppliers are not included in this figure. Please note there are 1,096 suppliers accounted for during FY21 for SAEC, which was divested from the South32 Group in June 2021. These may include some duplicates or overlap with the broader South32 Group.

(9) Aligned with the mandatory criteria in the Australian *Modern Slavery Act 2018* (Cth), our modern slavery risk assessments focus on suppliers and operations. We continue to work closely with our Commercial, Legal and Business Integrity teams to conduct human rights due diligence on our customers as needed.

Our approach⁽¹⁰⁾

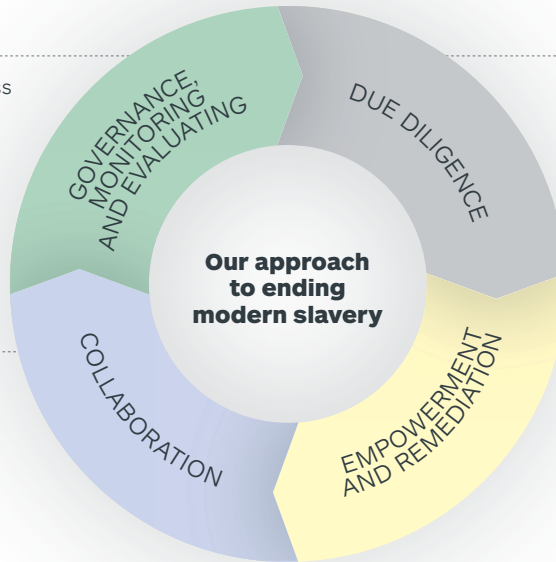
Our approach to modern slavery is guided by four pillars:

Examples include:

- Policies, Standards, Code of Business Conduct (Code), Supplier Requirements, Contract terms and conditions
- Commitments and Targets
- Benchmarking
- Modern Slavery Working Group
- Sustainability Board Committee

Examples include:

- Our Suppliers
- International Council on Mining and Metals
- United Nations Global Compact
- Sustainable Shipping Initiative
- WA Modern Slavery Collaborative
- Neptune Declaration



Examples include:

- Supplier Self-Assessment Questionnaire
- Supplier risk mapping
- Supplier scorecards
- Supplier audits

Examples include:

- Employee training
- Raising awareness
- Supplier training and workshops
- Enterprise Supplier Development Program
- Supplier Development Plans
- Remediation

Our human rights due diligence and remediation are guided by the United Nations Guiding Principles on Business and Human Rights and other key human rights international standards. Our key governance documents are set out in Appendix 1.



(10) Mandatory criterion outlined in section 16(1)(d) of the Australian Modern Slavery Act 2018 (Cth).

Due diligence⁽¹¹⁾

We use the following methods to identify modern slavery risks and associated labour violations or pre-indicators connected to our operations and supply chains.

Pre-indicators may include underpayment of wages, restricted access to unions, fraudulent recruitment, discrimination and restricted access to grievance mechanisms.

- **Group-wide anti-bribery and corruption (ABC) due diligence:** We conduct ABC due diligence checks on our higher risk suppliers and customers and include ABC clauses in our standard contracts with third parties. Our Code prohibits fraud, bribery and corruption in any form, and requires compliance with applicable ABC laws wherever we conduct business. Within our business we look for ways to share and use lessons learned across our ABC and human rights compliance programs.
- **Labour relations:** Our internal standards, processes and procedures align with relevant labour relations laws and regulations, including those relating to working hours, working conditions, entitlements, minimum wage, and the right to choose unions or association representatives. We help our frontline managers to understand and implement labour relations requirements in ways that respect human rights.

- **Human resources:** To attract and retain talent, our remuneration meets or exceeds legislative and industrial minimums. Our Human Resources teams conduct compliance reviews when significant changes are made to rosters or there are increases to minimum rates. In FY21, a newly implemented global Human Resources Service Delivery Model enhanced our human resources systems and process, including payroll.
- **Recruitment:** We work with reputable recruitment agencies and pay the cost of recruitment processes. If we become aware of advertisements that falsely advertise job opportunities with South32, they are quickly removed and appropriate remediation steps are taken. We were not aware of any false job opportunities advertised in FY21.
- **Non-discrimination:** Our Code requires everyone be “treated fairly, with respect and dignity and without discrimination” with disciplinary consequences, including termination of employment for breaches of our Code and Speak Up Policy. In FY21, we introduced updated Group-wide Code training to reinforce these expectations.
- **Speak Up mechanisms:** We encourage people to report human rights and modern slavery concerns. Our publicly available *Speak Up Policy* outlines the process for reporting and next steps. Concerns can be raised through EthicsPoint, a 24/7 confidential

reporting hotline that is serviced by an independent provider, or via other options including our line leaders. We provide regular reports to our Risk and Audit Committee and Board on material business conduct concerns and material breaches of our Code, including data on EthicsPoint reports.

- **Employee health and safety:** Our health and safety teams implement a range of health and safety controls, including fatigue and exposure hours controls, to help ensure that everyone goes home safe and well.
- **Community assessments:** In accordance with our Community Standard, we integrate human rights considerations into our operational risk management processes. Specific activities include social impact assessments, human rights impact assessments, audits, and security assessments. The community grievance mechanisms and consultation processes in place at our operations also help us identify issues. More about our approach to community and broader human rights assessments is available in our Sustainable Development Report.

We record risks through our system of risk management. This provides transparency, helps us take a consistent approach to managing risk and enables real time reporting from a single source.

(11) Mandatory criterion outlined in section 16(1)(d) of the Australian *Modern Slavery Act 2018* (Cth).

Reviewing our modern slavery risks

The Modern Slavery SAQ was developed in 2019 in collaboration with the WAMSc, of which we are a founding member. The practical toolkit for suppliers, which is comprised of 18 core questions, was designed to help identify modern slavery risks, improve transparency and recognise areas for further due diligence. The collaborative approach helps streamline reporting for suppliers by adopting a common industry approach.

Whenever red flags are identified through a completed SAQ, we engage with the relevant supplier to discuss, and where required, agree improvement actions. Our focus is on collaboration with suppliers; with termination being a measure of last resort. A review of completed SAQs highlighted that the majority of newly onboarded suppliers do not have modern slavery policies and procedures, nor do they undertake modern slavery due diligence within their own supply chains.

Recognising that the risks of modern slavery are often within lower tiers of supply chains, through sub-contracting arrangements, these findings confirmed the importance of working with suppliers to support them in maturing their own modern slavery policies and practices. Encouragingly, we have started to see our suppliers requesting their sub-suppliers complete the SAQ. The findings from the SAQ informs our supplier training strategy and areas for further supplier assessments.

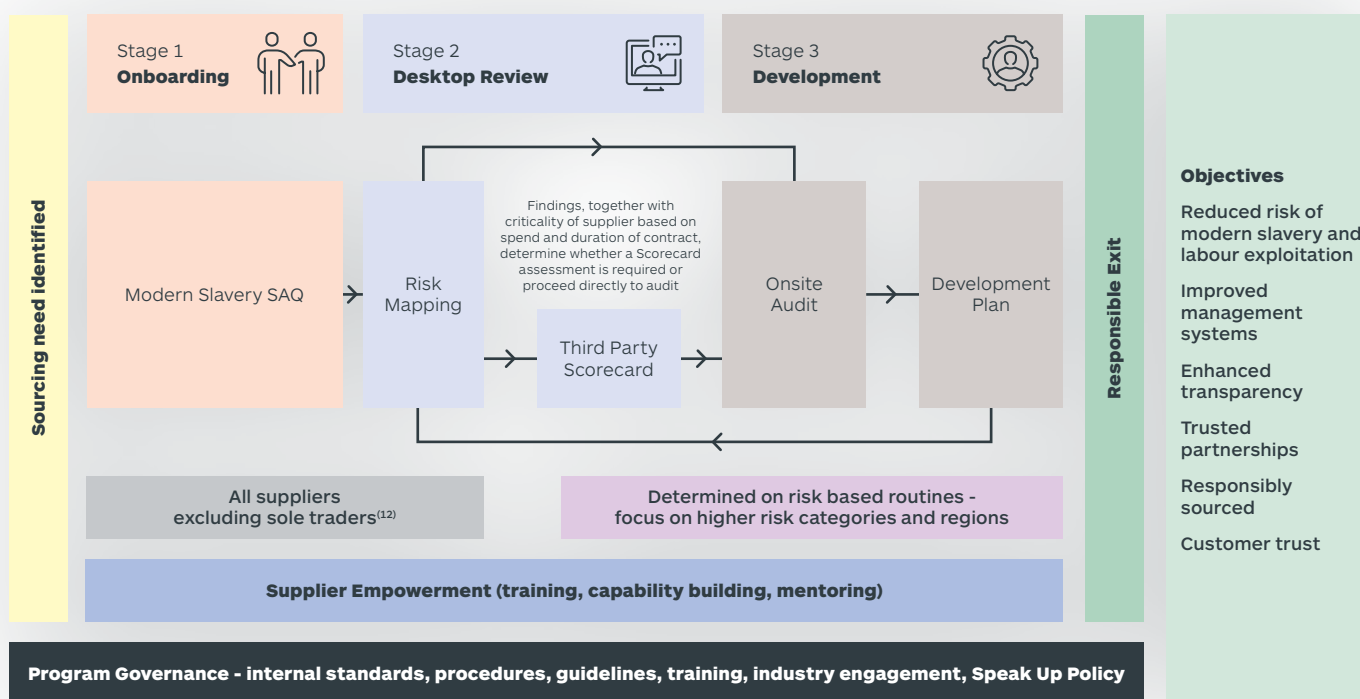
The SAQ enables a coordinated approach from all members of WAMSc to promote consistency and transparency in our industry, and is used alongside other tools, systems, and processes. The SAQ allows us to gather information about our suppliers' products, services and workforces. Just as importantly, it raises awareness about modern slavery. We have shared the SAQ and our learnings with the Australian TelCo Together Foundation and Australian Property Council industry modern slavery collaborative groups, as part of our commitment to collaborating across sectors.

We recognise that some suppliers may not disclose adequate information or may be nervous about doing so. Some fail to understand the nature of modern slavery. To overcome these limitations and continue our efforts to address modern slavery risks, we work collaboratively with our suppliers, including through independent supplier audits, supplier training and capacity building initiatives.

Supplier modern slavery assessments

Our Commercial team carry out a number of different supplier due diligence assessments at various stages of our sourcing and procurement process.⁽¹²⁾

Diagram 1 – Stages of supplier modern slavery assessments



Stage 1 - Supplier self-assessment questionnaire (“SAQ”)

As part of our supplier onboarding process, potential suppliers (excluding sole traders) are required to complete the modern slavery SAQ which was introduced in FY20 (see the case study on page 10). Suppliers must also confirm their commitment to our standards on the following:

- No child labour;
- No forced labour;
- Respectful treatment of employees including freedom of association and rights to collective bargaining;
- Living wage;
- Non-discriminatory practices; and
- Health and safety regulations.

Stage 2 - Desktop assessments

We identify our higher-risk direct suppliers by assessing the following criteria: country risk, workforce risk profile, industry risk profile, management capability and contract value.

In FY21, we significantly improved our approach to supplier risk assessment by introducing a third-party supplier sustainability assessment platform, EcoVadis.⁽¹³⁾ Previously, our supplier risk assessments were manually prepared, analysed against available external data, and reviewed by our inhouse subject matter experts. While we had a solid foundation for supplier risk assessments, it was not scaleable across the breadth and depth of our supply chain.

By using a third-party platform, we are moving towards a systemised, independently-verified assessment process that can be implemented across our supply chain. During FY21, we mapped

the sustainability risks of 5,354 suppliers (as shown in Diagram 2). Suppliers can choose to share their completed Scorecard with other customers, to improve their transparency and promote enhanced sustainability outcomes in the industry.

Using a third-party technology platform provides us with two types of assessment:

- **Risk mapping:** Mapping and assessment of suppliers for sustainability risks, based on country risks, industry risk profile and other reported risks, allowing for a rapid assessment of potential risks across our supply chain; and
- **Scorecard:** Independent desktop supplier assessments covering corporate social responsibility criteria including modern slavery and human rights. An individualised sustainability scorecard is provided, containing an in-depth analysis of a supplier’s approach to sustainability and its relevant risks.

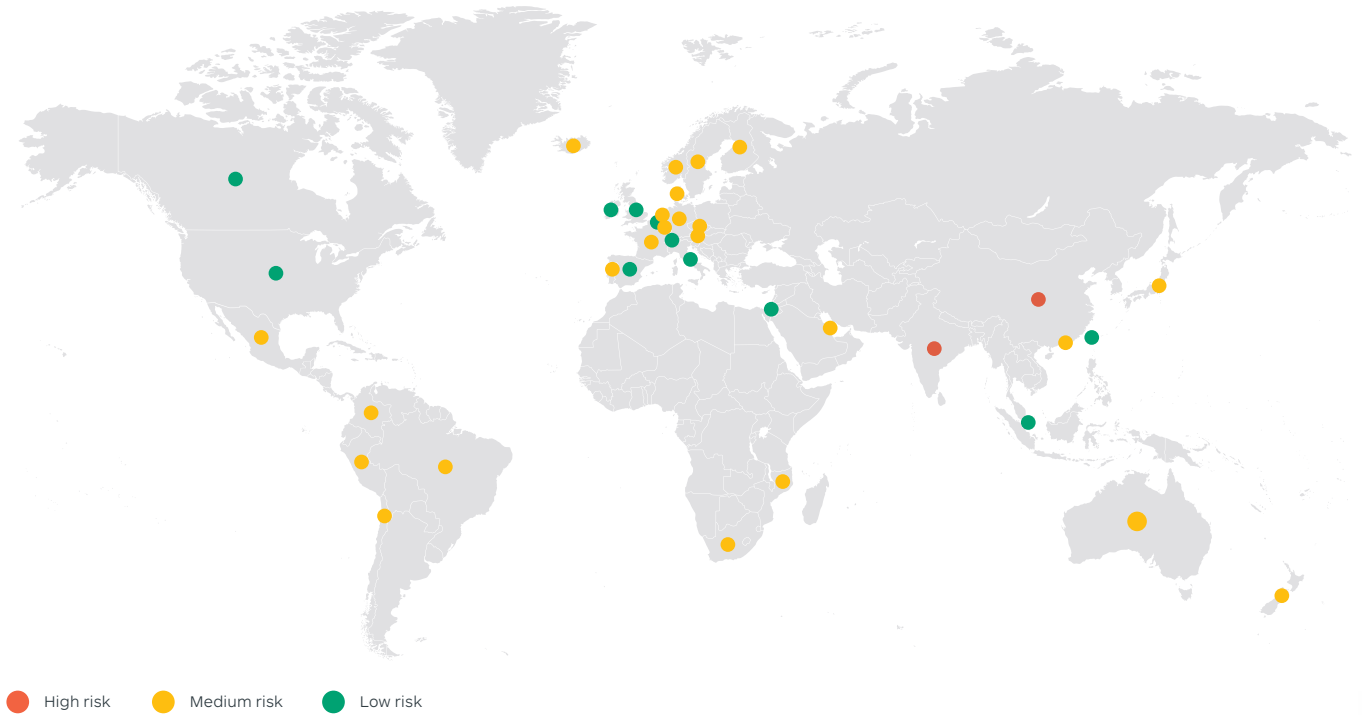
(12) Excluded sourcing and purchasing activity includes (a) traded goods and services; (b) purchasing cards (otherwise known as credit cards) which can only be used for low value transactions (under US\$2,000 per month), time sensitive land tenement payments or regulatory permit or license applications and renewals; and (c) non-order invoice payments which are typically limited to regulatory payments, internal payments (including to internal companies and joint venture partners), donations, employee benefits, non-employee reimbursements, legal settlements, or payments to doctors, hospitals or for medical treatments.

(13) EcoVadis is a ratings platform that assesses corporate social responsibility and social procurement and non-financial management systems including environment, labour and human rights, ethics and sustainable procurement impacts

Due diligence continued

Stage 2 - Desktop assessments continued

Diagram 2 - Mapping of South32's supplier sustainability risks by EcoVadis (as at April 2021).⁽¹⁴⁾



We transitioned to EcoVadis in March 2021 and work continues to implement the Scorecard Assessment. As we expected, it has taken some time to engage with our suppliers and demonstrate the shared value of responsible sourcing initiatives, while encouraging them to complete assessments.

In March 2021, we invited 700 suppliers to complete the EcoVadis Scorecard Assessment. These suppliers were chosen based on their risk profile and importance to our supply chain. At the end of FY21, 58 suppliers had completed their Scorecards and we are working with those remaining suppliers to encourage their participation. We recognise that the COVID-19 pandemic continues to impact our suppliers globally and may have affected the current uptake. If a supplier declines to complete the Scorecard Assessment, they will be asked to complete a manual modern slavery SAQ, which is reviewed by our Supply team.

We also conduct tailored risk assessments on higher risk categories of goods and services. In FY21, we focused on maturing our approach to due diligence and vetting of shipping and freight services. You can read more about this in our case study on page 13.

South32 has also completed its own Scorecard Assessment, in our capacity as a supplier, through EcoVadis.

Stage 3 - Onsite supplier assessments

If our risk assessments identify higher risks that require onsite inspections, we conduct either:

- Independent assessments of small to medium sized enterprises, that are either suppliers or potential suppliers to South32 as part of our South African Enterprise Supplier Development (ESD) program in South Africa; or
- Independent audits of selected suppliers. This audit process varies in nature, depending on the goods and services being delivered. Typically, it involves management and worker interviews, site inspections and a review of books and records. The independent auditor generally issues a report and recommendations, which we share with suppliers.

To strengthen our efforts across our entire supplier base, key lessons from assessments and audits are shared during Supply team meetings, monthly risk and assurance meetings and via a quarterly report issued by our internal Group Assurance team. In FY21, we completed 14 onsite assessments and audits (listed in Table 1). The findings of these audits are summarised in Table 2 on page 14.

The Walk Free Foundation Global Slavery Index reports that modern slavery occurs in every region, in both large and small businesses. During FY21, we demonstrated an improvement from FY20 by auditing a greater number of suppliers in Australia and Asia, alongside our continued focus in Latin America and support for small and medium sized beneficiaries in our South African ESD Program.

(14) Published with permission from EcoVadis .

Table 1: Summary of our FY21 Assessment and Audit Program

	Type of Audit	Relationship	Goods or Services Supplied	Country
(1)	Independent	Supplier	Freight and logistics services	Australia
(2)	Independent	Supplier	Shipping and freight services	Philippines Norway Singapore
(3)	Independent	Supplier	Supply of personal protective equipment	Australia
(4)	Independent	Supplier	Waste disposal services	South Africa
(5)	Independent	Supplier	Raw materials	South Africa
(6)	Independent	Supplier	Raw materials	Guatemala
(7)	Independent	Supplier	Technology services	South Africa
(8)	Independent	Supplier	Plant maintenance services	Colombia
(9)	ESD audit	ESD beneficiary	Equipment and plant hire services	South Africa
(10)	ESD audit	ESD beneficiary	Equipment and plant hire services	South Africa
(11)	ESD audit	ESD beneficiary	Equipment and plant hire services	South Africa
(12)	ESD audit	ESD beneficiary	Equipment and plant hire services	South Africa
(13)	ESD audit	ESD beneficiary	Catering services	South Africa
(14)	ESD audit	ESD beneficiary	Transportation services	South Africa

Strengthening our shipping due diligence

Seafarers are an integral part of our supply chain and they are particularly vulnerable to modern slavery and human rights risks. The COVID-19 pandemic exacerbated these risks, with an estimated 400,000 seafarers severely affected by travel and transit restrictions.⁽¹⁵⁾

In FY21, we reviewed and improved our approach to shipping due diligence. We updated our vetting processes, conducted rapid human rights due diligence assessments at the ports we operate from, and completed an independent shipping audit. While we do not own ships or directly employ seafarers, we collaborated with ship owners and operators to address relevant issues. Our key achievements included:

Enhanced vetting: We improved our vetting process for chartered ships. It now includes desktop reviews of previous port state breaches, the performance of technical managers, financial stability, regulatory compliance, adverse media screening for reputation indicators, and periodic physical inspections that focus on crew wellbeing and compliance with the Maritime Labour Convention.

Greater collaboration: We signed the Neptune Declaration in January 2021, supporting an urgent call to action for the maritime industry, governments, and other stakeholders to:

- Recognise seafarers as key workers and promote early access to COVID-19 vaccinations;
- Implement high quality health protocols;
- Increase collaboration between ship operators and charterers to facilitate crew changes; and
- Take steps to support airline connectivity between key maritime hubs.

As part of our implementation of the Neptune Declaration, we completed human rights due diligence at the ports we operate from, focusing particularly on crew change procedures. You can read more about our shipping collaborative initiatives on page 18.

Focused audit: We completed our first independent modern slavery audit on a chartered ship in FY21. This audit was completed remotely due to COVID-19 restrictions and involved video interviews with the shipowner’s management, a recruitment and manning agency, and more than 25 crew members. While no material issues were found, opportunities for improvement were identified. These included simplifying contracts for seafarers, ensuring that pay slips provide details of wages, overtime and benefits (plus any permitted deductions), and the provision of anonymous, safe and freely accessible grievance mechanisms for workers.

Community investment: We provided emergency funds to support the work of Mission to Seafarers (MTS). The organisation is a frontline responder which provides essential support services to seafarers, including shore visits, paid phone and WiFi access, and personal care packages.

CASE STUDY



(15) International Maritime Organization, <https://www.imo.org/en/MediaCentre/PressBriefings/Pages/32-crew-change-UNGA.aspx>, Media release published 25 September 2020.

Risks⁽¹⁶⁾

We aim to achieve year-on-year improvements in our processes and systems to identify and respond to human rights, modern slavery and other related exploitation risks.

In FY21, we did not identify any modern slavery practices at our operations or in our supply chain. However, we highlighted opportunities for some of our suppliers to improve their practices on respecting their workers' human rights. If left unaddressed, some of these practices had the potential to result in modern slavery. We are not aware of any legal or regulatory actions commenced, ongoing or completed against us during FY21 regarding modern slavery. Our FY21 risk profile is outlined in Table 2, including emerging related labour exploitation risks identified in our supply chain.

Table 2 - FY21 Supplier Risk Profile

Country Risks⁽¹⁷⁾	We recognise modern slavery risks exist in every country. In FY21, based on the EcoVadis Risk Mapping (see page 12), we identified that our higher risk suppliers operate in Australia, Brazil, China, Colombia, France, India, Mozambique, Singapore and South Africa.
Category Risks	<p>After reviewing modern slavery indicators such as: workforce labour profile; seasonal or temporary based work; and the nature of the work being performed, we concluded that our higher risk goods categories have not changed since FY20. They are:</p> <ul style="list-style-type: none"> - Raw materials; - Chemicals; - Coke and coal; - Electricals (components); - Electronics (hardware); - Explosives; - Parts and consumables; - Personal protective equipment and other safety supplies; and - Refractory materials. <p>Our higher risk service categories have not changed since FY20. They are:</p> <ul style="list-style-type: none"> - Facilities management (including cleaning); - Maintenance; - Construction; - Logistics; and - Shipping and freight (see our case study on page 13).
Local Suppliers	We identified an ongoing risk of poor labour conditions in supply chains in emerging markets, such as in Colombia and South Africa – particularly if suppliers are small to medium sized enterprises that are still developing their management capability and understanding of labour standards.
FY21 Audit Findings	<p>Our independent supplier audits found no incidence of modern slavery. However, across all audited suppliers, we identified opportunities for improvement in:</p> <ul style="list-style-type: none"> - Labour management systems policies, procedures and performance; - Employee policies and worker awareness of these policies; - Grievance mechanisms; and - Overtime and pay practices. <p>Our approach to remediation post-audit is explained on page 16.</p>

(16) Mandatory criterion outlined in section 16(1)(c) of the Australian *Modern Slavery Act 2018*.

(17) This does not include our South Africa Energy Coal (SAEC) supplier data which was managed separately during FY21. SAEC was divested from the South32 Group in June 2021.



Empowerment⁽¹⁸⁾

We want our employees, contractors, and suppliers to know and understand our policies and standards, so they can identify, assess, and respond to risks appropriately. To encourage this to happen, we raise awareness, offer appropriate training and build capability across our business.

Employee and Board training

Modern slavery training is mandatory for employees and contractors in roles that have regular touchpoints with potential human rights risks. In FY21, we redesigned our modern slavery training program to include updated recommendations about how to identify risks, additional case studies, and improved understanding of modern slavery legislation. This training, available in English and Spanish, was delivered as an e-learning module and included an assessment component to help improve learning outcomes. More than 1,000 people, including a number of our Directors, completed modern slavery training in FY21.

Raising awareness

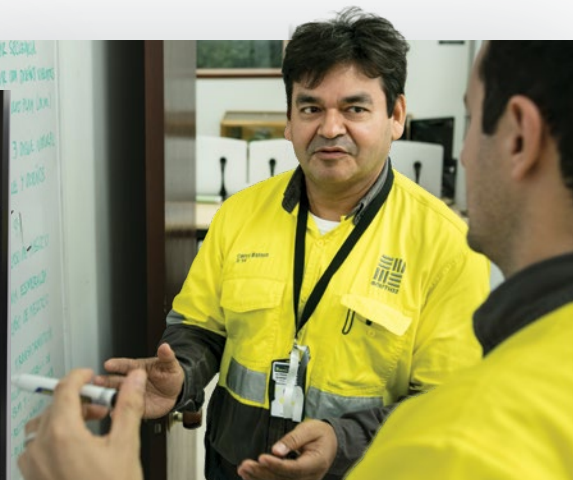
On United Nations Human Rights Day (10 December) and Human Rights Day in South Africa (21 March), our teams raised awareness of human rights, including freedom from modern slavery, across our offices and operations. We promoted awareness through newsletters, internal communications, posters and social media posts.

Supplier training

In FY21, we piloted two modern slavery awareness training workshops for suppliers at Worsley Alumina in Western Australia and Mozal Aluminium in Mozambique. This training was designed to raise awareness about modern slavery as well as new legislation and expectations on suppliers. In the workshops, we discussed how we can work in partnership with suppliers to address supply chain risks. The Worsley Alumina workshop was attended by 11 companies, and 30 companies participated at Mozal Aluminium. Additionally, through our ESD Program in South Africa, dedicated modern slavery training was provided to 84 small, micro and medium sized enterprises (SMMEs). Through a structured business mentorship program, support was provided to 32 SMMEs to develop their own anti-slavery policies. In total we delivered modern slavery training to 125 companies in FY21. In FY22, we will explore ways to develop this workshop format and other new training methods, focusing on suppliers in higher risk categories or regions.

Enterprise Supplier Development program

For SMMEs in South Africa, the business environment can be challenging and highly competitive. We have developed our ESD Program⁽¹⁹⁾ to help local SMMEs address the challenges they face, whether they are suppliers or potential suppliers to South32. The program is designed to help them build capability and become sustainable, competitive suppliers for larger companies. Training is tailored to meet the specific needs of the participants, but typically covers financial management, corporate governance, health and safety, and human resources. In FY21, we worked with our ESD service providers to include a new module designed to help SMMEs identify and respond to modern slavery risks and develop appropriate labour policies in ways that respect human rights. For many participants, this was a new and essential resource. During FY21, 84 SMMEs completed modern slavery modules as part of the ESD Program, across our South Africa Energy Coal, Hillside and Hotazel Manganese Mine operations. A personalised mentorship program was also introduced to help some SMMEs review high-risk areas of their operations, develop their own anti-modern slavery policy and review employment contracts.



(18) Mandatory criterion outlined in section 16(1)(c) of the Australian *Modern Slavery Act 2018*.

(19) ESD Program falls under the South African Transformation Broad-Based Black Economic Empowerment legal framework.

Remediation⁽²⁰⁾

We recognise that we are responsible for providing or participating in the remediation of any identified human rights impacts that we cause or contribute towards.

Our Code, Speak Up and grievance procedures, all include safe and effective methods to investigate and respond to claims and concerns in an ethical, confidential and transparent way.

We carry out periodic community perception surveys, regular community consultations and enter into formal agreements with host communities. Our community complaints and grievance procedure outline processes to respond to all concerns that are raised. You can read more about our approach to working with communities in our Sustainable Development Report.

FY21 responses

During FY21 we did not identify any modern slavery practices at our operations or in our supply chain. In FY21 a customer-chartered vessel was detained by the Australian Maritime Safety Authority at Port Kembla, due to numerous deficiencies, including that living conditions onboard were in breach of the United Nation’s Maritime Labour Convention. We supported crew welfare efforts by providing emergency funding for the local Mission to Seafarers to deliver fresh provisions, chaplaincy support and care packages.

We continued to respond to allegations submitted via EthicsPoint, aligned with our Speak Up Policy and Business Conduct Response Procedure. During FY21, examples of allegations included concerns about alleged labour exploitation connected to payment of wages, overtime, housing and access to benefits. We worked quickly to investigate these allegations and implement appropriate actions to address any substantiated concerns, in accordance with local laws and our Code. All reporters are expected to receive an initial holding response within three business days of submitting an EthicsPoint report to confirm receipt of their case. The case is then confidentially allocated to the relevant internal team for further assessment and investigation (if required). To confirm operating effectiveness, our business conduct response processes are tested bi-annually as part of our critical control risk management approach.

Supplier development plans

We work with our suppliers to agree development plans to remedy identified issues and strengthen labour standards. We monitor these plans and their effectiveness. All required actions highlighted in FY20 audits have now been completed or suppliers have demonstrated good performance against them, and are tracked using our system of risk management. Because of COVID-19 restrictions, our FY21 audits were all conducted in the second half of the financial year. Consequently, we intend to agree development plans with suppliers during the first quarter of FY22. We are continuing to refine our systems, processes and training, so that plans are transparently documented and proposed actions are followed up.

Industry remediation action plan

In conjunction with Walk Free Foundation and WAMSc, we have prepared a global remediation action plan to be used if an instance of modern slavery is identified. This plan, which will be incorporated into our internal standards in FY22, recognises the vulnerability of modern slavery victims and provides guidance on how to respond in a manner that respects victims and prevents further harm. The plan also provides country specific case studies, which include contact details for victim support services.



(20) Mandatory criterion outlined in section 16(1)(c) of the Australian *Modern Slavery Act 2018*.

Governance, monitoring and evaluating⁽²¹⁾

We assess our effectiveness in identifying and managing modern slavery and human rights risks by tracking our actions and outcomes, engaging with suppliers, utilising regular internal governance and external assurance processes, and commissioning external assessments of our performance.

Tracking our actions and outcomes

During FY21, we achieved our targets and commitments, with the following results:

- Increased visibility of modern slavery risks in our supply chain (page 11);
- Improved supplier awareness of modern slavery and labour management systems, particularly for SMMEs as part of our ESD Program (page 15); and
- Employees are equipped to identify and respond to modern slavery risks after completing a tailored training program (page 15).

We also included modern slavery supply chain risks on our risk register, with control management activities aligned through our system of risk management to measure and monitor performance. See Appendix 2 and 3 for more detail.

Improved governance and assurance

During FY21, we updated our Sustainability and Business Conduct – Minimum Supplier Requirements (available in English and Spanish), which sets out our expectations for suppliers. This now includes revised requirements relating to modern slavery, security and human rights and conflict minerals. We aim to review it annually and align it with our criteria for supplier assessments.

To help improve cross functional accountability, in FY22 we will establish a working group with representatives from Supply, Marketing, Legal, Human Resources and Sustainability to meet quarterly to review the effectiveness of our approach. This will assess effectiveness indicators such as:

- Whether we have sufficient and effective risk controls;
- The percentage of suppliers that have been identified as high, medium or low risk;
- How many SAQs have been issued, and appropriately completed by suppliers;
- How many supplier audits or assessments have been completed;

- Details of any modern slavery incidents or related exploitation;
- Details of any employee, community or supplier engagement and feedback; and
- Details of any remedy provided by South32 or suppliers, separately and collectively.

We will align the working group's activities with our business planning review process to create a critical input to the annual disclosure review process for our Modern Slavery Statement.

Both our approach and this statement are endorsed by our Sustainability Committee of the Board, on the recommendation of our South32 Lead Team. The Sustainability Committee helps our Board assess the appropriateness and effectiveness of our sustainability frameworks and systems, the Sustainability Policy, and the Group's sustainability performance. Our Board is required to have a demonstrable understanding of issues related to human rights and to consider the potential human rights impact of our operations on a range of stakeholders. We provide regular updates to the Sustainability Committee of the Board on human rights and modern slavery. Read more about our approach to governance at <https://www.south32.net/who-we-are/risk-governance>.

Each financial year, our company auditor provides limited assurance on our approach to human rights. The audit process used:

- Verifies our data;
- Evaluates the design and implementation of our key systems, processes and controls for collecting, managing and reporting our sustainability information;
- Assesses the risk analysis we carry out to validate our own materiality assessments; and
- Reviews whether our data is reported in accordance with the Global Reporting Initiative's Sustainability Reporting Standards.

External benchmarking and industry reports

We disclose our human rights and broader sustainability performance to environmental, social and governance (ESG) ratings agencies, investors, proxy advisors and customers through responses to their questionnaires and data checks. The feedback and scores we receive from independent ESG rating agencies provide a view of the effectiveness of our actions. We submit responses to ESG ratings agencies and indices, including Sustainalytics, MSCI, ISS and Workforce Disclosure Initiative. We actively participate in these assessments and approach them as opportunities to test and benchmark our performance.

During FY21, we contributed to many different academic research studies as well as industry guidance, media and benchmarking exercises, including:

- Australian Council of Superannuation Investors, "Moving from paper to practice: ASX200 reporting under Australia's Modern Slavery Act", July 2021;
- Modern Slavery Review for the University of Western Australia to inform the three-year review of the *Modern Slavery Act 2018* (Cth);
- Review of Modern Slavery Statements by the University of New South Wales; Alliance Bernstein "*Modern Slavery Risk in Australian Equity Portfolios, how to research it, and how to reduce it*", September 2020;
- IntheBlack "*Why Accountants Play a Lead Role in Supply Chain Management*", 1 July 2020; and
- The "*Investors Against Slavery and Trafficking Asia-Pacific Initiative*".

Our FY20 Modern Slavery Statement was analysed and commended by the Journal of Modern Slavery, saying that some of the details of modern slavery risks "could be of significant benefit in building the knowledge base regarding manifestations of modern slavery so that other businesses, governments and civil society can act accordingly." We were recognised as a modern slavery reporting leader by the 2021 Ethical Standards Partners Fund Management Report.⁽²²⁾

(21) Mandatory criterion outlined in section 16(1)(c) of the Australian *Modern Slavery Act 2018*.

(22) Journal of Modern Slavery (Volume 5, Issue 2, 2020) "Australia's Modern Slavery Act and COVID-19 a get out of jail free card?", Fiona McGaughey, Law School, University of Western Australia.

Collaborative efforts⁽²³⁾

STRENGTHENING OUR RELATIONSHIPS

We recognise the importance of collective and considered action to address shared modern slavery risks. We regularly facilitate and participate in industry initiatives that encourage and enable organisations to share information, lessons learned and best practice. This helps our industry to overcome challenges, identify blind spots, and assess whether our initiatives are in line with our own expectations and those of wider society.

During FY21, we met our partnership goals through the following key initiatives:

WA Modern Slavery Collaborative Group (WAMSc)

WAMSc members continued to share best practice and create collaborative opportunities to tackle modern slavery risks in mining, energy and resources supply chains. We hosted several working groups, provided administrative resources and facilitated the development of two new workstreams focused on remedy and shipping. In May 2021, the WAMSc was awarded the Financial Times Innovative Lawyers 2021 Award (Asia-Pacific) in the inhouse legal team - social justice category.

United Nations Global Compact (UNGC)

We continue to contribute to the UNGC Australian Modern Slavery Community of Practice. You can read more in our annual UNGC Communication of Progress in the Sustainable Development Report.

Shipping

Given the complexity of our shipping supply chain and its multiple stakeholders, we recognise the importance of collaboration. In FY21, we focused on several initiatives, including:

- Participating in Australian Port Welfare Committees, which bring together representatives from port authorities, regulators, immigration, non-for-profit agencies, charterers and manning companies, to review risks and seafarer welfare initiatives, including processes for crew changes and access to medical support for seafarers;
- Supporting the Sustainable Shipping Initiative's development of a code of conduct for charterers, shipowners and operators to promote respect for the rights of seafarers;
- Working with the Global Maritime Forum to influence the development of the Neptune Declaration, then subsequently signing the Neptune Declaration in January 2021 and implementing its recommendations; and
- Providing emergency community investment to the Mission to Seafarers at all the ports we operate from in Australia, to support seafarer welfare initiatives.

As part of our work to prevent modern slavery, we also address its root causes including discrimination, inequalities and lack of access to education or work. We take these underlying factors into account as part of our holistic approach to respecting human rights across our spheres of influence. For more information, you can read our Sustainable Development Report.



(23) Mandatory criterion outlined in section 16(1)(c) of the Australian Modern Slavery Act 2018.



Appendix 1 - Governance documents

Our Approach to Human Rights sets out the core principles and human rights standards that guide our approach to respecting human rights in our operations and value chains.

Our Code of Business Conduct (“Code”) sets the standards for our people to act ethically, responsibly and lawfully. It outlines our expectations on human rights, including freedom from slavery for all stakeholders. It applies to our people (Directors, executive management, employees and contractor staff), our suppliers and joint venture partners acting on our behalf in a controlled or operated joint venture.

Our contracts require employees and suppliers to adhere to our Code, Sustainability Policy, human rights, sustainability and business requirements.

Our Community Standard determines how we undertake due diligence for our operations, to enable us to identify, prevent, mitigate and account for the ways in which we address potential human rights impacts. All operations must undertake an annual human rights impact self-assessment and operations based in medium or higher risk countries are independently reviewed every three years.

Our **Complaints Process Guidelines** provide guidance on the design and implementation of our operations’ complaints processes, based on the UN Guiding Principles on Business and Human Rights.

Our procedures and frameworks establish the specific and practical steps needed to implement and manage our commitments. We are continuously improving our responsible sourcing approach, focusing on human rights, labour exploitation, modern slavery, anti-bribery and corruption and preferential local sourcing. This approach promotes trusted, collaborative and transparent relationships with our suppliers.

Our **Speak Up Policy** (being our global Whistleblower Policy) is contained in our Code. This outlines the options for reporting a business conduct concern and what happens when a report is made and how we will protect the reporter. We do not tolerate any form of retaliation against anyone for reporting a business conduct concern. We encourage all our people to Speak Up when our values and Code are not being followed. Anyone can report a business conduct concern, anonymously if preferred, using our confidential and independently administered EthicsPoint reporting hotline. We respond to identified or reported breaches of our Code in line with our Speak Up Policy and related business conduct response processes and procedures.

Our Sustainability and Business Conduct – Minimum Supplier Requirements (“Supplier Requirements”) sets out our minimum responsible sourcing expectations for suppliers. This document is reviewed annually.

Our Sustainability Policy outlines our commitment to respect human rights and we require all our employees and suppliers to operate in line with it. Our **Privacy Policy** and **Inclusion and Diversity Policy** promote the respect of human rights in the way we do business.

Our Supplier Onboarding process requires potential suppliers to confirm that they understand and comply with our human rights requirements. We adopt a partnership approach with suppliers to resolve any issues. If a supplier refuses to work with us to improve their performance, we may choose to suspend or terminate our relationship with them.

Appendix 2 - South32 key data updates and performance indicators from FY19 to FY21

	FY19	FY20	FY21
# of Employees	14,244	14,554	9,074 ⁽²⁴⁾
# of Suppliers	6,000	6,775	5,668 ⁽²⁵⁾
Payments to Suppliers	US\$4.7 billion	US\$5.3 billion	US\$5.05 billion
# of countries where suppliers are located	54	55	46
	Goods	Goods	Goods
	Parts and consumables at sites	Parts and consumables at site	Parts and consumables at site
	Explosives	Explosives	Explosives
	Raw Bulk Materials	Raw Materials	Raw Materials
	Coke and Coal	Coke and Coal	Coke and Coal
	Electronics (including components)	Electronics (hardware) and Electronics (Components)	Electronics (hardware) and Electronics (Components)
Higher risk goods and services categories	Personal Protective Equipment and other Safety Supplies	Personal Protective Equipment and other Safety Supplies	Personal Protective Equipment and other Safety Supplies
		Chemicals	Chemicals
		Refractory materials	Refractory materials
	Services	Services	Services
	Construction	Construction	Construction
	Shipping and Freight	Shipping and Freight	Shipping and Freight
		Maintenance	Maintenance
		Facilities Management	Facilities Management
# of suppliers assessed (desktop - risk profiles such as country & industry)	10	401	5,354
# of suppliers assessed (desktop review, based on documented evidence provided by supplier)	n/a (new FY21 process)	n/a (new FY21 process)	58 EcoVadis
# of Independent Audits completed	5	6	8 Independent Audits and 6 Enterprise Supplier Development modern slavery audits for South Africa Energy Coal
# levels of supply chain audited	Direct suppliers	Direct suppliers and sub-suppliers	Direct suppliers
Key Human Rights and Labour risks identified during site audits	<ul style="list-style-type: none"> - potential for excessive overtime - inadequate rest days - workers not understanding employee contract and employee payment terms - risk of inadequate access to sufficient drinking water - inadequate supplier social and labour policies and procedures, including inadequate grievance mechanisms - risks of discriminatory practices - inequalities faced by workers and harassment. 	<ul style="list-style-type: none"> - poor pay practices - excessive overtime - inadequate rest days - workers not understanding employee contract or employee payment terms, freedom of association, - failure for suppliers to align of their management system with South32 Code of Business Conduct - unlawful discipline procedures - inadequate grievance and redress mechanisms. 	<ul style="list-style-type: none"> - poor pay practices; - excessive overtime; - poor employee policies and lack of worker awareness of these policies; - labour management systems policies, procedures and performance; and - inadequate grievance and redress mechanisms.
# of Supplier Development Plans	6	6	8
# of SAQ's issued	n/a (new FY20 process)	350	595
# of employees (& contractors) receiving modern slavery training	1,000	1,242	1,105
# of suppliers receiving training	0	34 + 22 South Africa Energy Coal suppliers	125 entities

(24) As at 30 June 2021.

(25) Please note there are an additional 1096 suppliers accounted for during FY21 for SAEC, which was divested from the South32 Group in June 2021. These may include some duplicates or overlap with the broader South32 Group.

Appendix 3 - South32 performance as against effectiveness targets, commitments and forward-looking intentions for FY22

Effectiveness Targets

Demonstrate improvement in the breadth and depth of suppliers assessed for modern slavery risks.

Verify that all independently audited suppliers implement supplier development plans (where required), with priority actions closed out within agreed time periods.

All employees who have been identified as having regular touchpoints with human rights risks complete modern slavery training.

FY21 Performance

We improved the breadth and depth of our assessments in FY21 with 5,354 suppliers mapped and assessed for country and industry modern slavery risks, together with receiving 58 EcoVadis scorecard assessments. This was a substantial improvement from FY20 where we assessed 401 of our suppliers.

All independently audited suppliers in FY20 have closed out priority actions. Suppliers independently audited in FY21 have or are finalising development plans, as required.

100% of required employees completed the updated e-learning module training in FY21. In addition, the e-learning training was assigned to broader range of operational and functional based roles. In total there was 1,105 completions by employees and contractors during FY21.

Commitments Tracker	FY20 Performance	FY21 Performance	Aims for FY22
	<i>Green indicates commitment was achieved during FY20 Yellow means commitment is continuing.</i>	<i>Green indicates commitment was achieved during FY21 Yellow means commitment is continuing.</i>	<i>Performance updates will be provided in FY22 Modern Slavery Statement.</i>
Risk Assessments	Demonstrating year on year improvement of our systems and processes, developing consistency across our global operations and improving our cross-functional governance oversight.	Page 10 of FY20 Modern Slavery Statement (MSS) Improved our holistic understanding and identification of modern slavery risks within our supply chain by implementing technological systems to provide consistency, accessibility and quality to our processes, while increasing the breadth and depth of suppliers we assess.	Page 11 Embed a third party modern slavery risk assessment platform in supplier onboarding process, tenders or prequalification (as appropriate) and enhance engagement with Suppliers to adopt the third party platform.
	Piloted an industry agreed "self-assessment questionnaire" for suppliers in our onboarding processes.	Page 10 of FY20 MSS Completed the pilot to improve the industry-wide supplier self-assessment questionnaire.	Page 10 Review integration of the Supplier Modern Slavery SAQ to complement the Scorecard assessments.
	Completed a minimum of five independent labour audits.	Page 10 of FY20 MSS Continuing to mature our risk assessment processes to identify and respond to any identified heightened modern slavery risks within our operations and supply chains due to COVID-19.	Page 12 Continue to demonstrate year on year improvement in depth and breadth of onsite assessments and audits, which may include identifying opportunities where modern slavery assessments can be integrated into existing health and safety assessments at operations.
		Page 13 Completed an independent audit within our shipping supply chain, focusing on COVID-19 impacts on seafarers.	Page 13 Further enhance our shipping due diligence and vetting processes.
Training	Improving awareness and understanding of modern slavery risks, such as by hosting roundtables and providing training.	Page 11 of FY20 MSS Launched updated modern slavery and human rights training series for employees who are identified as having regular touchpoints with human rights risks.	Page 17 Continue to deploy modern slavery awareness training to broader range of operational and functional based roles.
	Developed training for employees and the capability of Contract Owners to implement and monitor development plans with suppliers audited.	Page 11 of FY20 MSS Identifying ways to make our modern slavery training available for suppliers.	Page 15 Deliver the supplier training strategy, to enhance awareness and understanding of modern slavery focusing on suppliers operating in higher risk regions and/or known higher risk categories.
Remedy & Grievance Mechanisms	n/a no commitment	Page 16 Strengthening the awareness of and access to our complaints and grievance mechanisms (including EthicsPoint helpline) for employees, workers within our supply chain or individuals within our communities to report concerns.	Page 16 Work with stakeholders to identify ways for seafarers to have improved access to grievance mechanisms, focusing on the ports we operate from.
		Page 16 Developing a remediation response protocol for responding to modern slavery allegations.	Page 16 Implement the Industry Modern Slavery Remediation Action Plan into internal procedures and communicate to key stakeholders.
Collaboration	Continuing to find innovative ways to work with our suppliers, peers, industry member associations, governments and society.	Page 14 of FY20 MSS Continuing to strengthen our relationships in our initiatives described on page 14 of FY20 MSS.	Page 18 Continue to support the WAMSc, Global Compact Network of Australia, Sustainable Shipping Initiative and Neptune Declaration.
Governance & Effectiveness	Reviewed our impact, including by developing outcomes focused targets to assess the effectiveness of our approach.	Page 12 of FY20 MSS Reviewing and improving the integration of our governance documents such as relevant policies, standards, contractual terms and conditions, and make any required updates.	Page 17 Establish Cross Functional Modern Slavery Working Group.

