

Community and Social Sustainability Standards

HGO SUSTAINABILITY STANDARDS FOR COMMUNITY AND SOCIAL

The Community and Social responsibility Standards are one of four performance areas under the Sustainability Policy. The purpose of the Community and Social Standards is to:

- Demonstrate objectively HGO's commitment to operating responsibly, fostering positive relationships with communities, and contributing to sustainable development.
- Describe the requirements for communication with community members, ensuring they are informed about our activities, potential impacts, and mitigation measures.
- Outline the way in which HGO is to create shared value by generating local employment opportunities, supporting local businesses, and contributing to regional economic growth through taxes, royalties, and community investments.
- Provide a process for respecting the rights, cultures, and traditions of the communities where HGO operate.
- Ensure that cultural heritage sites are protected.
- To identify and eliminate human slavery in HGO supply chains.

Building and maintaining strong, supportive relationships and partnerships with local people in the areas we operate drives value creation for both the business and community. We seek to deliver long-term benefits to local communities and other stakeholders by engaging and collaborating, understanding the social impacts of our activities, mitigating negative effects and achieving outcomes of mutual benefit.

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1. Community Consultation

1.1. Scope

Stakeholder engagement and community consultation.

1.2. Performance Requirements Assets and Projects

Planning

Develop and implement a **Community Relations Plan** that includes consideration for the following requirements:

- Identifying key community groups and stakeholders who may potentially be affected by the activities of the Asset or Project.
- Studies into the cultural and social structure of local communities impacted by activities.
- Socio-Economic Study on the affected communities to establish a baseline.
- Identification of potential economic benefit to local communities that is sustainable and promotes local employment and procurement.
- Engagement with key community groups and stakeholders to determine:
 - The risks and social impacts of the Asset or Project's activities.
 - Engagement and communication protocols for each community/ stakeholder group.
 - Relevant social norms of the community.
- Alignment of community investment decisions with initiatives that deliver benefits to the community beyond the life of the mine.
- Giving preference to employing applicants from the local community and/or the local traditional custodian group where all other things are equal and to procuring from local and/or Indigenous owned businesses and requiring contractors to do the same.

Performing

- Engage with the community and stakeholders in a culturally fit for purpose manner which is inclusive of minorities and marginalised groups.
- Ensure all engagements are conducted in good faith and in a timely manner.
- Maintain records of all community consultation and engagement activities.
- Maintain a complaints and grievance system that effectively documents complaints made by community groups or stakeholders, including the investigation process and response.
- Observe and record as part of community consultation, any changes that are occurring in local cultural norms, whether organically or from external interactions.
- Report to Executive Committee monthly on delivery of the Community Relations Plan activities and any trends developing in stakeholder engagement, community sentiment or community incidents.
- Report to local community stakeholders on an annual basis on activities, community activities and any trends developing in stakeholder engagement or complaints.
- Retain records of Asset or Project's community related activities.

Review

- Keep accurate records of local and Indigenous employment and procurement rates for contractors and monitor to identify opportunities to improve outcomes.

2. Cultural Heritage

2.1. Scope

Respect and protection of, local culture, heritage, areas of religious or cultural significance or other potential areas of significance within the Asset or Project area of influence.

2.2. Performance Requirements Assets and Projects

Planning

- Identify relevant communities and under national and local laws.
- Proactively collaborate with relevant communities to protect and manage cultural heritage in the areas of their activities.
- Cultural heritage includes:
 - Tangible places and objects.
 - Archaeological assets.
 - Ceremonial assets and burials.
 - Art and historical infrastructure
 - Intangible heritage such as story assets, song lines, language and dance.
- Develop and implement a heritage management system designed by a competent professional.

Performing

- Work with relevant community groups according to local cultural norms.
- Maintain a register of tangible cultural heritage features and intangible cultural heritage features and values.
- Maintain records of access and make available to heritage bodies and groups who place significance on the heritage asset(s) and maintain an inventory of all assets, exclusion zones and their locations according to cultural norms and laws pertaining to heritage, except where cultural norms require confidentiality.
- Document all industrial and historical heritage features, stories and values.
- Wherever possible, design and locate activities to avoid disturbance of cultural heritage.
- Mitigate unavoidable disturbance or destruction in active collaboration with heritage custodians.
- Report as soon as possible any significant incident involving disturbance of cultural heritage to HGO Executive Committee, local custodians and authorities.
- Record and investigate all allegations of unauthorised disturbances and incidents relating to cultural heritage and have remedy processes in place for incidents of cultural disrespect.
- Demonstrate use of, and regularly update, cultural heritage management planning that results in no damage to assets without the prior agreement of custodians.
- Work actively with local communities to maintain and celebrate local cultural activities.
- Implement appropriate protocols for the dissemination of information, acknowledging cultural and intellectual property rights that are appropriate to jurisdiction.

Training and Awareness

- Provide awareness training on heritage features and how to respond to 'chance finds.
- Provide cross-cultural awareness training for employees and stakeholders where this is relevant.

Review

- Conduct an annual review of the cultural heritage performance and community groups feedback.
- Review the cultural heritage register for validity on an annual basis.

3. Human Rights and Slavery

3.1. Scope

Human rights and trafficking in persons, slavery, slavery-like practices (including forced labour and forced marriage) and child labour.

3.2. Performance Requirements Board

Prepare an annual modern slavery statement for the Australian Anti-Slavery Commissioner that includes the following information:

- HGO's structure, operations and supply chains.
- The potential modern slavery risks in HGO's operations and supply chains.
- Actions HGO has taken to assess and address the risks, including due diligence and remediation processes and how the effectiveness of actions have been assessed.

3.3. Performance Requirements Executive Committee

Develop a process to screen and monitor contractors, suppliers and other parties engaged by HGO in relation to human rights exposures. The scope of the screening must extend to:

- Direct suppliers of goods and suppliers of services, as well as deeper-level suppliers.
- Financial lending and investments, joint ventures, leasing activities, research and development activities.

Ensure that, where appropriate, due diligence is performed to:

- Ensure that specific human rights threat assessments are completed in high risk areas.
- Document and manage human rights exposures, risks and mitigations within our Assets and throughout our supply chain.

3.4. Performance Requirements Assets and Projects

Planning

Develop and implement a **Human Rights Management Plan** that includes consideration for the following requirements:

- Identification of actual and potential human rights threats, including child, forced or compulsory labour, through a human rights threat assessment. In low threat situations this may be part of the normal social risk assessment.
- Responding to significant human rights threats identified in the human rights/social risk assessment.
- Reporting and investigating complaints and grievances with a process that is transparent and based on engagement through dialogue. The outcome is required to be fair and unbiased.
- Development of processes to screen and monitor contractors, suppliers and other parties engaged by the Assets in relation to human rights exposures.

Performing

Undertake a risk assessment of slavery risks within operations and supply chains including:

- Developing risk treatment controls for managing unacceptable risk.
- Assessing the level of effectiveness of risk treatment controls.
- Reporting any human rights abuses to the relevant government entity.
- Implementing an induction awareness training of human rights responsibilities with senior management, employees and other relevant stakeholders.

Engage with employees, contractors, community groups and other stakeholders in a manner that protects the basic rights and fundamental freedoms to which all human beings are entitled.

Review

- Conduct annual reviews of supply chain stakeholders for their human rights performance.
- Report annually on human rights performance to the Executive Committee.

4. Land Access and Acquisition

4.1. Scope

Land holders and land-connected indigenous groups with inherent rights as traditional custodians in close proximity to, or affected by, Assets or Projects operations and activities.

4.2. Performance Requirements Executive Committee

- Review and approve, where appropriate, land acquisition and access agreements, plans and investments on behalf of HGO.
- Establish an independent mediation body to resolve disputes related to land acquisition or access, with equal representation from Indigenous communities.

4.3. Performance Requirements Assets and Projects

Planning

Land-Connected Indigenous Peoples

- Ensure that preliminary knowledge-base studies are undertaken to determine the ethnographic and legal identification and rights of land-connected Indigenous groups, including the potential rights and interests in surface, ground and navigable waters.
- Where Indigenous groups have ethnographically confirmed customary rights and interests coincide with HGO's areas of interest, collaboratively work with these groups in the spirit of reciprocity, transparency and mutual future interest.
- Where Indigenous groups have legally recognised rights and interests coincident with a HGO interest, prepare specific agreements that recognise the Indigenous group's connections to lands and waters and ensure that such agreements are consistent with and satisfy the tenets of free prior and informed consent.
- Ensure that fair compensation for land holders is provided and benefit-sharing agreements for any land use or acquisition and ensuring long-term benefits for Indigenous communities.
- Consider additional benefits such as access to health, education, and employment opportunities.
- Obtain approval of the Executive Committee prior to entering into or executing any agreements with Indigenous groups.

Performance

- Recognise that every Indigenous community is unique.
- Investigate alternative options to any land access or acquisition requirement.
- Ensure that expert advice is sought, where the context requires, to ensure the correct Indigenous community groups are consulted and considered in relation to the activities of the Asset or Project.
- Negotiate transparently and in good faith, with the free, prior, and informed consent of the affected Indigenous communities.
- Provide details in local-level agreements of the interactions with land-connected Indigenous groups using the name such groups prefer for themselves.
- Maintain documentary evidence of all meetings, discussions, decisions and other relevant information.

Review

- Review agreements on an annual basis, or more frequently where warranted, to ensure compliance with performance requirements.