

THE PERTH MINT

# Modern Slavery Statement

---

## 2020/21

This voluntary Modern Slavery Statement is made on behalf of Gold Corporation group of companies trading as The Perth Mint.



THE PERTH MINT  
AUSTRALIA



# Contents

About this statement	5
Chair's message	7
Our commitment	8
Who we are	11
Identifying modern slavery risks	15
Actions taken to assess and mitigate modern slavery	17
Assessing the effectiveness of actions	22
Future actions	23
Approval	24



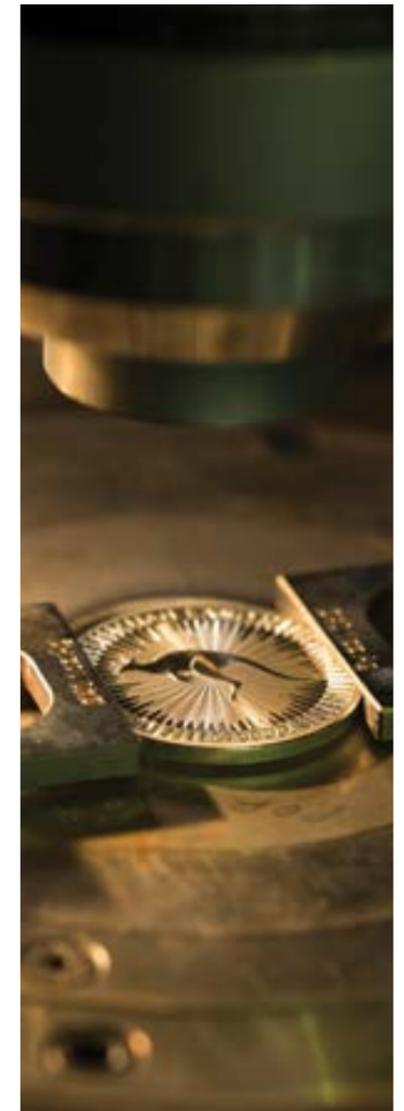
# About this statement

In this statement, Gold Corporation (The Perth Mint) describes the risks of modern slavery within our operations and supply chains. The statement details the actions that we have taken as at financial year end 30 June 2021, and describes the actions that we will continue to take, to assess, address and remediate these risks.

As a Government Trading Enterprise of the Western Australian Government governed by the *Gold Corporation Act 1987*, The Perth Mint and its group of companies are not reporting entities for the purposes of the *Modern Slavery Act 2018 (Cth)* and are not required to submit a modern slavery statement under that legislation.

Instead, we choose to voluntarily make this statement as a sign of our strong and ongoing commitment to the principles it describes.

We value all feedback. Please refer any comments about this Statement or request for additional information to [info@perthmint.com](mailto:info@perthmint.com).



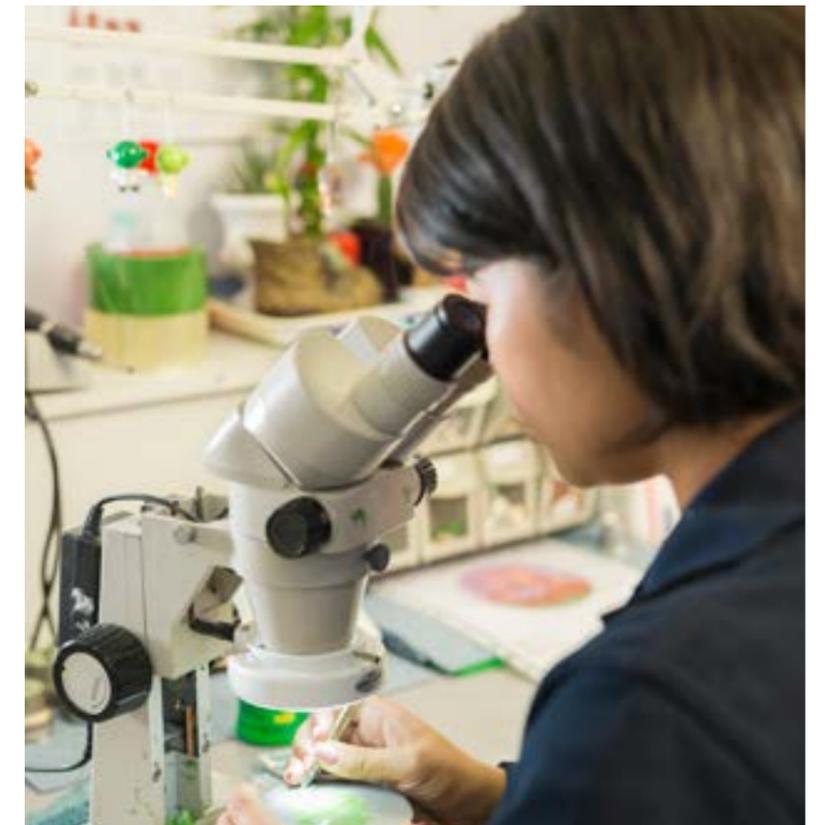


# Chair's message

As a Government owned entity, people and communities have been at the core of what we do for over 120 years. The Perth Mint is a vertically integrated business with a complex global supply chain which incorporates organisations that operate in conflict areas/jurisdictions. We realise that each of us at The Perth Mint has an important role to play in combating modern day slavery in all its forms. We know that modern slavery directly affects approximately 2000 people in Australia<sup>1</sup> and tens of millions of people worldwide.

Modern slavery is a complex problem that requires a determined, collaborative approach from multiple stakeholders to find a solution. The Perth Mint is committed to making a positive contribution to achieve that goal.

Aligning with our vision to *inspire excellence in the precious metals industry*, The Perth Mint leads by example to ensure that all staff are trained in modern slavery issues and requires our suppliers adhere to our Human Rights Policy.



We are committed to working with our stakeholders to make modern slavery a thing of the past. We are proud to publish our second voluntary Modern Slavery Statement to communicate the

slavery risks in our supply chain and what we are doing to mitigate the risks.

This statement has been approved by the Gold Corporation Board.

<sup>1</sup> Anti-Slavery Australia, <https://antislavery.org.au/modern-slavery/> (accessed 14 October 2021)



# Our commitment

We acknowledge the positive and negative impacts that our business operations may have on various stakeholders, and the importance of conducting our business operations responsibly. Several policies and procedures are applicable to the way we conduct our business and they include commitments that ensure we do not engage in practices or business relations that cause or contribute to human rights violations, including modern slavery.

Modern slavery is a broad term used to describe a wide range of exploitative practices such as forced labour, servitude, debt bondage and the worst forms of child labour. These practices can have lifelong consequences for victims and are severe breaches of human rights.

The Perth Mint is committed to respecting, protecting, and promoting human rights. We endeavour to operate our business activities in a manner consistent with the *United Nations Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights with its two Optional Protocols*, the *International Covenant on Economic, Social and Cultural Rights*<sup>2</sup> and the *International Labour Organization's Declaration on fundamental Principles and Rights at Work*<sup>3</sup>. In addition, we are committed to upholding *The Voluntary Principles on Security and Human Rights* and *ILO-IOE Child Labour Guidance Tool for Business*.

The publication of this second voluntary Modern Slavery Statement aligns with our vision *to inspire excellence in the precious metals industry* and our ongoing commitment to drive a responsible and sustainable value chain. Our vision and commitment are underpinned by our values (Responsibility, Integrity, Safety and Excellence) which focus our behaviours across all levels of the organisation.

We recognise that this is a continuous journey and we commit to the ongoing review of our policies, processes, systems and procedures as well as working with our suppliers, customers, employees and stakeholders to identify and mitigate any gaps in our current business practices that may cause an increased risk of modern slavery.

<sup>2</sup> UN General Assembly, *International Bill of Human Rights*, (adopted 10 December 1948), available at <https://www.ohchr.org/documents/publications/compilation1.1en.pdf> (accessed 14 September 2021)

<sup>3</sup> International Labour Organization (ILO), *ILO Declaration on Fundamental Principles and Rights*, (adopted 18 June 1998) available at <https://www.ilo.org/declaration/lang-en/index.htm> (accessed 14 September 2021)



## FY2020/21 activities





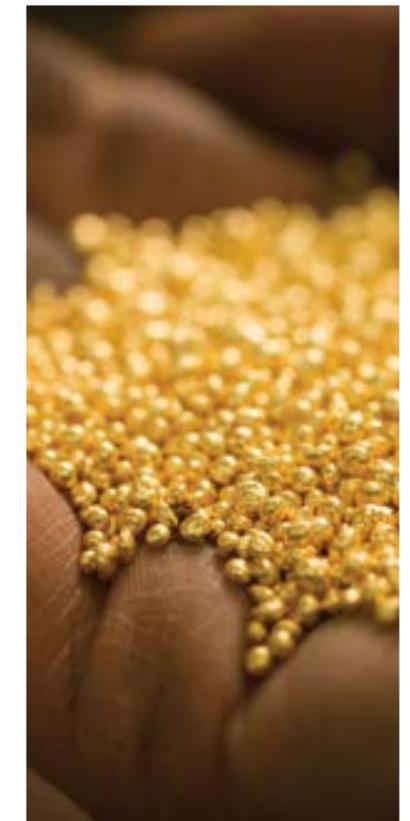
# Who we are

The Perth Mint is Australia's oldest operating mint and largest fully integrated precious metals enterprise. Established in 1899 and still operating from our original premises in East Perth, The Perth Mint is a vertically integrated global enterprise that operates across the entire precious metals value chain. For more than a century, The Perth Mint has made significant contributions to both the Australian economy and to our community.

Our business operates across the entire precious metals value chain, from refining to the delivery of physical products and investment solutions to markets worldwide. We are Australia's only accredited gold and silver refinery, weight master and assayer accredited by all five of the world's leading commodity exchanges<sup>4</sup>. As a 100% State Government owned enterprise, The Perth Mint is subject to exceptional oversight and public scrutiny.

For the purposes of the Australian *Modern Slavery Act 2018 (Cth)*, Gold Corporation is the reporting entity.

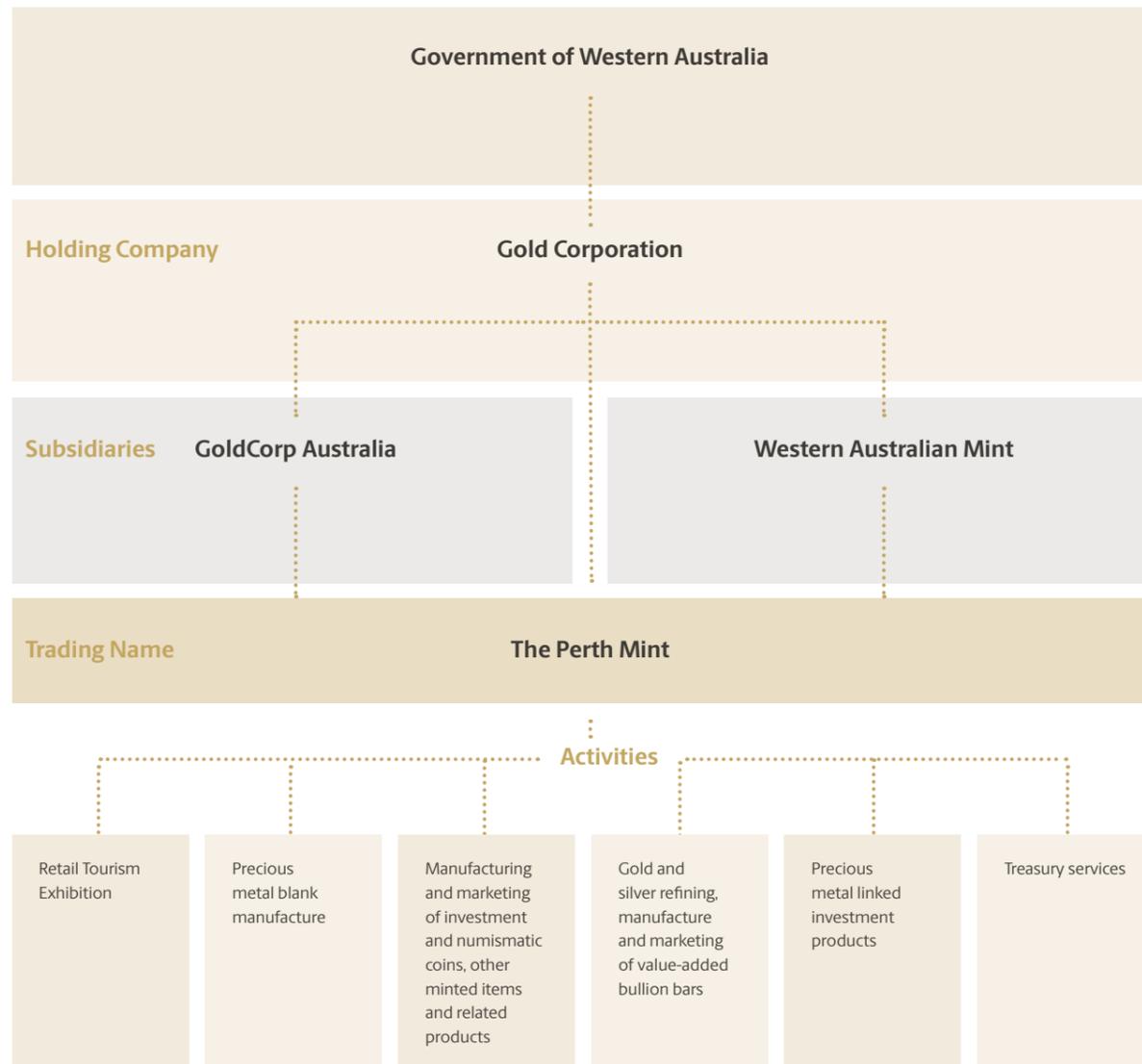
The Perth Mint has made significant contributions to both the Australian economy and to our community.



<sup>4</sup> The London Bullion Market Association (LBMA), The New York Commodity Exchange (COMEX), The Shanghai Gold Exchange (SGE), The Tokyo Commodity Exchange (TOCOM) and The Dubai Multi Commodities Centre (DMCC).



# Company structure



## Our operations

The Perth Mint produces a range of gold and silver investment bars, minted bars and coins for investment and collector markets. We also provide precious metals storage and investment programs to over 70,000 customers across 130 countries. Our shop and exhibition operate a retail and tourism function in Perth from our historic Hay Street premises. Even under strict COVID border restrictions, in 2020/21 we welcomed over 12,000 visitors to our shop and exhibition.

The Perth Mint is a precious metals refining, manufacturing, minting, marketing, distribution, and storage business.

## Our workforce

The Perth Mint is a proud Australian employer with a current workforce of over 530 employees and contractors (80% of our total workforce are permanent staff) engaged across our precious metals refinery, coining division, shop and exhibition, treasury and depository, and supporting roles.

Our teams have been formed by individuals from a wide range of national, cultural, and ethnic backgrounds. This is in line with the progress made on our Reconciliation Action Plan, which is one of the several measures taken over the years to foster a more diverse and inclusive workforce particularly in increasing Aboriginal and Torres Strait Islander participation.





**Our supply chain**

A clear, transparent, and appropriate risk appetite drives our customer and supplier onboarding decision-making process. It is the filter through which we continually evaluate all our business relationships. We continue to decline any business relationship with any entity that we deem to be unsuitable, because it may compromise the integrity of our value chain.

The Perth Mint has over 4,000 approved local and international suppliers providing a diverse range of goods and services.

In FY2020/21, we sourced precious metals from 20 countries. Over 96% of the gold processed through our refinery was newly mined (primary) gold and 78% of the primary gold originated from Australia. 66% of the newly mined gold was sourced from local Western Australian producers.

Our silver feedstock is sourced from accredited suppliers in Australia and overseas, both in the form of newly mined metal and secondary metal.

Our platinum feedstock is sourced in its fully refined form from accredited overseas suppliers.

**The Perth Mint refines both newly mined and secondary gold and silver feed from across Australia and beyond.**



# Identifying modern slavery risks

**Industry specific risks (precious metals)**

The Perth Mint understands that modern slavery has the potential to exist in our supply chains in various forms of exploitation including trafficking, slavery, servitude, child labour, forced labour, debt bondage and deceptive recruiting.

Our business operations are susceptible to the risks associated with modern slavery, from the extraction and mining processes through to downstream value-added products and investment activities. The intrinsic value and fungible nature of precious metals dictates that an enhanced level of due diligence is required to maintain supply chain transparency and integrity, and to ensure the risks of modern slavery practices are mitigated.

Particular risks associated with the precious metals industry are set out below:

- Precious metal mining and extraction processes – in emerging economies, mining operations tend to rely on large quantities of unskilled labour, which may pose various increased human rights and modern slavery risks.
- Precious metal transportation activities – metal transportation, particularly in emerging economies can result in increased modern slavery risks.
- Precious metal refining activities – the secondary precious metals sector including the buying and refining of precious metal scrap, jewellery and other secondary materials may provide financial support to modern slavery practices as well as directly incurring human rights and modern slavery abuse, especially when conducted in emerging economies.

- Precious metals investment activities – investment in precious metals can present risks for money laundering, terrorism finance, corruption and trade with sanctioned countries and other conflict regions. The risk of modern slavery is considerably higher in conflict countries and therefore precious metals investment activities may finance modern slavery practices.

**The global extraction of, and trade in, precious metals has a high risk of exposure to modern slavery practices.**



**Country risk**

The Perth Mint recognises that through offering its products and services and engaging suppliers in several jurisdictions, there is the risk of facilitating criminal activity, human rights abuses, or other unacceptable conduct. Circumstances can change quickly, and in working to reduce and minimise the risk of our supply chains, products and services being misused, The Perth Mint regularly reviews emerging risks and developments at a country level.

These results are incorporated into The Perth Mint's Jurisdiction Risk Assessment (JRA), which considers risks in relation to its joint AML/CTF Program and Responsible Sourcing Program. This assessment is completed by utilising several external organisations' data sources including, but not limited to, the Basel AML Index, Cato Institute's Human Freedom Index and Transparency International's Corruption Perception Index.

**Sourcing risks**

The Perth Mint procures the following high-risk goods and services from international suppliers as ranked by the Global Slavery Index (2018)<sup>5</sup>:

- Laptops, computers, and mobile phones for use within our business;
- Garments such as Personal Protective Equipment (PPE) and uniforms for our workforce;
- Facilities management (such as waste management and trade services); and
- Transport and logistics (freight and warehousing) for both precious metals and other goods procured.

We also use international suppliers for items such as coin packaging which may have risk of modern slavery in their business.

<sup>5</sup> Global Slavery Index 2018, <https://www.globallslaveryindex.org/2018/findings/highlights/> (accessed 14 October 2021)



# Actions taken to assess and mitigate modern slavery

**Core governance policies**

The Perth Mint is dedicated to continuously identifying, monitoring, and managing any material risk that may arise in relation to our business operations. We have adopted several relevant policies to govern and inform our business operations. Details of several of the most relevant of our policies to modern slavery risks are set out below.

**Human Rights Policy**

Our Human Rights Policy outlines The Perth Mint's commitment to undertake responsible business practices and incorporate the principles set out in the *United Nations Declaration of Human Rights*<sup>6</sup> and the *Guiding Principles on Business and Human Rights*<sup>7</sup>, and other international best practice standards.

In FY2020/21, we commenced a review of our Human Rights Policy to ensure that it aligns with the organisation's values, including more broadly in our supply chain management and oversight. The revised policy is approved and in use.

**Code of Conduct**

Our Code of Conduct requires all employees, contractors, directors, and officers to act transparently, with integrity and in compliance with applicable laws and regulations when executing or carrying out their respective duties and responsibilities.

**Supplier Code of Conduct and Ethics**

Our Supplier Code of Conduct and Ethics includes mandates in relation to labour practices and modern slavery. These mandates include:

- confirming in their respective contracts that there are no violations of modern slavery in any form;
- re-affirming their commitment to The Perth Mint's Supplier Code of Conduct;
- conducting internal assessment of their supply chain to better understand and identify any suspected or potential modern slavery violations; and
- investigate, report, and remediate any modern slavery violations if any.

Our Code of Conduct and Supplier Code of Conduct is incorporated into the terms and conditions that regulate all purchase orders for goods and services. New and existing suppliers who enter business arrangements with The Perth Mint under a purchase order are governed by the terms and conditions of our standard purchase order. Under our standard terms and conditions, a breach of this Code constitutes an event of default, which if unremedied, would give us the right to terminate the supplier's business relationship with The Perth Mint.



<sup>6</sup> UN General Assembly, *International Bill of Human Rights*, (adopted 10 December 1948), available at <https://www.ohchr.org/documents/publications/compilation1.1en.pdf> (accessed 20 October 2021)

<sup>7</sup> United Nations Guiding Principles on Business and Human Rights, (adopted 20 October 2021) available at [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf) (accessed 14 October 2021)



**Responsible Metal and Supply Chain Policy**

Our Responsible Metal and Supply Chain Policy sets out our commitment to managing relationships with suppliers and customers to mitigate human rights risks, including all forms of modern slavery associated with our business operations.

**Further policies and procedures**

In addition to The Perth Mint's core governance policies, the following policies are applicable to all our employees and suppliers and are relevant in mitigating modern slavery risks in our business operations.

**Risk Management Policy**

Our Risk Management Policy and Framework reflects the guidance set out in the ISO 31000 Risk Management standard and assists in assessing which suppliers we engage with and customers we want to do business with. The Perth Mint aims to identify risks across its supply chains and operations and includes consideration of risks as outlined above.

The Risk Management Policy enables The Perth Mint to practise sound corporate governance by:

- identifying risks to achieve the outcomes and objectives of the organisation in line with Risk Management Standard (ISO 31000:2018);
- ensuring effective implementation and continual improvement of risk management plans and controls;
- allocating appropriate responsibility for risk management; and
- monitoring the ongoing effectiveness of the risk management plans and controls.



**Risk Management Framework**

The risks associated with modern slavery are assessed within The Perth Mint's Risk Management Framework. This framework is overseen by the Audit and Risk Management Committee, which reports to the Board.

When considering customer and supplier relationships, modern slavery and human right abuse risks are considered within our due diligence process. This is further captured through The Perth Mint's JRA, which utilises independent external data sources to reflect key risks at a jurisdictional level, including risks aligned to modern slavery and human rights abuses. These data sources include, but are not limited to, The Minderoo Foundation's Global Slavery Index, UNICEF's Child Labor Data and the Cato Institute's Human Freedom Index. Identified touchpoints are escalated through the appropriate internal governance channels, including the Enterprise Risk Committee, and appropriately managed.

The Board and the Audit and Risk Management Committee actively monitor the effectiveness of our risk management and regulatory compliance systems.

**Anti-Bribery and Anti-Corruption Policy**

The Anti-Bribery and Corruption Policy establishes our commitment to the opposition of all forms of bribery and corruption and provides the appropriate limitations on the giving and receiving of donations and gifts.

**Responsible Sourcing and Supply Chain Policy**

The Responsible Sourcing and Supply Chain Policy sets out The Perth Mint's commitment to refining conflict free metals and managing relationships with suppliers and customers to mitigate misuse in our supply chains, including modern slavery and human rights abuses.

This is reflected in social, ethical, environmental and governance policies and information collected from customers through due diligence on our supply chains.

**Whistleblower Policy**

Our Whistleblower Policy encourages all employees, contractors, and suppliers to report any material or suspected violations of The Perth Mint's Code of Conduct or any legal or regulatory obligations. This policy also describes how we intend to protect any employee or contractor who discloses or informs The Perth Mint on any such violations.





**Training and awareness**

All employees of The Perth Mint are required to comply with key internal controls, including our Code of Conduct and Human Rights Policy. Employees who undertake sourcing or sale of precious metals must comply with our Responsible Metals and Supply Chain Policy.

To ensure compliance with the above-mentioned key policies and procedures, our employees are provided with resources and undertake training as part of their induction process. Our employees are also required to complete a bi-annual compliance training review which includes modules relating to human rights and modern slavery.

Our learning management system allows us to track the number of employees who have completed their human rights and modern slavery training modules. As 30 June 2021, over 92% of our workforce had completed our Modern Slavery Training module and we are working towards bringing this to 100% by targeting operational staff with in-person training sessions by the end of the second quarter 2021/22.



To ensure compliance with the above-mentioned key policies and procedures, our employees are provided with resources and undertake training as part of their induction process.



**Due diligence**

The Perth Mint undertakes due diligence on new and existing suppliers. The exposure to modern slavery risks form part of these reviews. We adopt a risk-based approach based on factors such as the supplier's country of origin and goods or services they offer/supply.

For existing suppliers, The Perth Mint conducts due diligence to:

- identify any potential or suspected modern slavery violations in our supply chains; and
- understand what steps have been taken by the supplier to mitigate modern slavery risks or violations.

**Metal supply due diligence**

The Perth Mint undertakes due diligence on new and existing suppliers of precious metals through its supply chain due diligence systems and procedures. Exposure to modern slavery risks forms part of these reviews.

The Perth Mint adopts a risk-based approach, which includes that, prior to any new supply arrangement being entered into, a risk assessment is conducted on the prospective supplier (**see policies and procedures above**). We require high-risk suppliers to complete a risk assessment questionnaire and/or be audited independently.

In FY2020/21, we elected not to commence or continue precious metal supply arrangements with a handful of suppliers due to concerns relating to environmental, social and governance risks, as well as internal risk appetite.

**Metal supplier audits**

In accordance with our Responsible Metals and Supply Chain Policy, metal suppliers operating mine sites in high or very high-risk jurisdictions are required to have an onsite assessment completed within six months of commencing the business relationship. In the event of unprecedented catastrophic or global events, such as travel restrictions caused by the Covid-19 pandemic, a modification to on-site visit timeframes may be required.

Our due diligence systems and procedures reflect the standards of LBMA's Responsible Sourcing Programme, and reflect the requirements of relevant local legislations. As part of The Perth Mint's obligations, as outlined in the Responsible Gold and Silver Guidance by the LBMA, an annual responsible sourcing audit is conducted by an accredited third-party. The outcome of these reports can be found on The Perth Mint's website [here](#).



# Assessing the effectiveness of actions

## Grievance mechanism

The Perth Mint provides grievance mechanisms designed to support and encourage all our employees and supply chain to continuously identify and escalate issues relating to modern slavery violations. This is consistent with our *Whistleblower Policy*.

## Remediation

To date, The Perth Mint has not received any reports or allegations relating to actual or suspected modern slavery violations with respect to our business operations. As we continue to develop our due diligence activities and deepen our engagement with suppliers, we will focus on developing remediation approaches for those impacted by modern slavery.



# Future actions

The Perth Mint is committed to taking the necessary steps towards identifying and addressing the risk of modern slavery practices occurring in our business operations and supply chains.

We will roll out our recently updated Human Rights Policy to our suppliers in the third quarter 2021/22.

We will continue to review our policies, standards, and procedures, seeking to improve our internal controls beyond their current levels, including a review of our human rights framework.

We will work with our customers and suppliers to ensure they understand our commitment, and assist them to reach the expectations we set, while also taking learnings from them to incorporate into our own continuous improvement journey.

## FY2021/22 planned activities





# Approval

---

This statement has been approved by the members of the Gold Corporation Board on 20 December 2021.

A handwritten signature in black ink, appearing to read 'Sam Walsh AO', written over a thin horizontal line.

**Sam Walsh AO**  
Chair