

HUMAN RIGHTS AND MODERN SLAVERY POLICY

VG-HR-025-PUB



PURPOSE

This policy describes Valhalla's proportionate approach to respecting human rights and reducing modern slavery risk in its operations, partnerships and supply relationships.

PUBLIC COMMITMENT

- Forced labour, trafficking, child labour and other serious exploitation are not accepted in Valhalla's operations.
- Supplier and partner checks are scaled to the nature, location, value and risk of the relationship.
- Valhalla seeks practical remediation where it identifies a credible human-rights concern connected with its activities.

STATUS	Published
POLICY OWNER	Managing Director
PROPOSED APPROVER	Valhalla Board
PUBLICATION	Published v1.0

1. Application and governance approach

Valhalla is an Australian-based private company. This document is applied in a practical and adaptable manner, with controls suited to the nature and risk of the activity. The Managing Director may set or adjust implementation arrangements, subject to law, contracts and matters reserved to the Valhalla Board. Ordinary operations may proceed within approved budgets and delegations. A significant departure from ordinary operations, material change, unusual commitment, new jurisdiction or matter outside approved authority must be documented and approved before implementation, including by the Valhalla Board where required.

Valhalla does not represent that it can guarantee a slavery-free global supply chain or trace every input. Its approach is to focus available resources on relationships and activities presenting the greatest reasonably identifiable risk.

2. Workplace standards

Valhalla seeks to provide lawful, respectful and safe working arrangements. Forced labour, debt bondage, trafficking, unlawful child labour, confiscation of identity documents, unlawful recruitment fees, threats and serious workplace exploitation are prohibited.

3. Suppliers, contractors and partners

Relevant considerations may include country and sector risk, use of labour hire or subcontracting, workforce vulnerability, recruitment practices, accommodation, site conditions, ownership and prior allegations. Lower-risk suppliers may be managed through standard terms and ordinary commercial checks. Higher-risk relationships may require additional questions, evidence, contractual commitments, monitoring or not proceeding.

4. First Nations and community considerations

Human-rights considerations may overlap with land access, cultural heritage, Indigenous data, community impacts and benefit sharing. The relevant First Nations, environmental, safety and partnership documents should be applied where those matters arise.

5. Raising concerns and remediation

A suspected human-rights or modern slavery concern may be raised with the Managing Director, a director or through current website reporting details. Valhalla may seek information, pause work or payments, require corrective action, engage specialist advice, support an affected person, notify an authority or end a relationship, depending on the circumstances.

Where possible, the response should avoid creating additional harm for affected people and should consider whether disengagement or continued leverage is more likely to support remediation.

6. Records and review

Material due diligence and actions should be recorded in a form proportionate to the relationship. Valhalla may update its approach as its supply chain, jurisdictions and reporting obligations develop. This policy is not a claim of complete traceability or absence of risk.

Related documents

- Code of Conduct and Ethics
- Partnership and Sponsorship Acceptance Principles
- First Nations Engagement, Indigenous Data and Cultural Heritage Commitment
- Health, Safety, Fieldwork and Remote Operations Commitment

Document control and approval

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PUBLICATION CONTROL Published v1.0. This is the current website publication. Procedures may be adapted proportionately, but any substantive amendment to the published commitments requires controlled review, approval and versioning.