Core Values

APPROVED BY THE BOARD OF PANTORO GOLD LIMITED

VERSION: 2

Background

Pantoro Gold Limited (Pantoro or the Company) is an ASX-listed gold producer operating mining and processing facilities in Norseman, Western Australia. Pantoro recognises the interconnectedness of environmental stewardship, social responsibility, and ethical governance in delivering long-term business success and securing its social licence to operate.

As global expectations for transparency, climate action, responsible supply chains, and stakeholder inclusivity increase, Pantoro is committed to leading through policies that guide sustainable decision-making. This ESG Governance and Sustainability Policy provides a foundational framework for ensuring that all business practices support the Company's broader Environmental, Social, and Governance (ESG) strategy, including compliance with legal requirements, alignment with international standards, and ongoing engagement with internal and external stakeholders.

Purpose

The purpose of this policy is to articulate Pantoro's commitment to sustainability and ethical governance, and to outline guiding principles that apply across environmental, social, and corporate functions.

Through this policy, Pantoro aims to:

- Ensure responsible environmental and social management across its operations and supply chain.
- Comply with applicable legal and regulatory obligations.
- Integrate ESG risks and opportunities into corporate strategy and operational planning.
- Promote stakeholder trust through transparency and ethical conduct.
- Support global sustainability goals, including the UN Sustainable Development Goals (SDGs).

Principles

Pantoro's ESG governance is guided by the following foundational principles:

- **Sustainability** – Safeguard environmental resources, promote human rights, and reduce adverse impacts through operational efficiency and innovation.
- **Compliance** – Adhere to all relevant environmental, health and safety, labour, and corporate governance requirements.
- Innovation – Pursue new technologies and methods that improve ESG performance.
- **Transparency** – Maintain open, honest communication with stakeholders and regulators.

Core Values

- **Continuous Improvement** – Adapt ESG practices based on monitoring data, stakeholder input, and evolving best practices.

These principles reflect Pantoro's Core Values:

- **Strong** – Collaborate and remain committed to achieving collective goals
- **Responsible** – Protect our people, communities, and the environment.
- **Ambitious** – Strive for excellence and sustainability leadership.
- **Noble** – Act fairly and uphold ethical standards.
- **Honest** – Be transparent and accountable to all stakeholders.

Commitments

Pantoro commits to the following actions to uphold this ESG Governance and Sustainability Policy:

- Embed ESG considerations into all corporate decision-making and risk management processes.
- Identify and manage environmental and social impacts, including biodiversity, emissions, and community relations.
- Maintain compliance with applicable laws, permits, and ESG frameworks such as GRI, SASB, and the Paris Agreement.
- Provide employees and contractors with training and resources to implement this policy.
- Engage transparently with regulators, Traditional Owners, investors, employees, and local communities.
- Ensure suppliers and partners align with Pantoro's ESG standards through procurement and audit practices.
- Promote diversity, equity, inclusion, and workplace safety across all business units.

Performance Indicators

To monitor and evaluate the effectiveness of this policy, Pantoro will track and report on:

- **ESG Compliance Rate**: Adherence to applicable laws and internal ESG procedures.
- **Training Participation**: Workforce completing ESG-related training (e.g., environment, ethics, safety).
- **Environmental Footprint Metrics**: GHG emissions, water use, waste, and energy efficiency.
- **Social Engagement**: Number and quality of engagement activities with communities and stakeholders.
- **Audit Outcomes**: ESG audit results and closure rate for corrective actions.

- **Policy Awareness**: Periodic assessments of employee understanding and alignment with ESG policies.

These KPIs support external ESG reporting and internal continuous improvement.

Reporting Concerns and Breaches

Pantoro is committed to maintaining the highest standards of integrity, compliance, and accountability. All employees, contractors, suppliers, and stakeholders are encouraged to report any actual or suspected breaches of this policy, or any related unethical or unlawful conduct.

Reporting Channels

In addition to the Integrity Hotline, concerns can be reported directly to any of the following:

- Your line manager or supervisor
- OHS team member
- Whistleblower & Grievance Officer (Company Secretary)

All reports will be treated seriously, confidentially, and in accordance with the company's Whistleblower Policy and applicable laws. No person will suffer retaliation or adverse consequences for reporting in good faith.

Policy Control

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