Diversity, Equity and Inclusion (DEI) Policy

APPROVED BY THE BOARD OF PANTORO GOLD LIMITED

VERSION: 2

Background

Pantoro Gold Limited (**Pantoro** or the **Company**) operates gold mining and processing facilities in Norseman, Western Australia. Pantoro is committed to building a diverse, equitable, and inclusive workplace that values the unique perspectives, experiences, and contributions of all individuals. We believe that diversity enhances innovation, decision-making, and business performance by drawing on the broadest range of talent, backgrounds, and ideas.

A respectful and inclusive culture supports our ability to attract, retain, and develop employees and leaders who reflect the communities in which we operate. It also aligns with Pantoro's responsibilities as an ASX-listed company to demonstrate ethical leadership, fair opportunity, and accountability in governance and workforce development.

This policy has been developed to guide how we promote diversity across all levels of the organisation, including Board composition, senior leadership, recruitment, development, and workplace conduct. It supports compliance with:

- The ASX Corporate Governance Principles and Recommendations (Recommendation 1.5), which require listed entities to adopt and disclose a diversity policy and measurable objectives;
- Relevant equal opportunity and anti-discrimination legislation; and
- ESG frameworks such as GRI 405: Diversity and Equal Opportunity, which call for transparent, fair, and inclusive workplace practices.

Pantoro is committed to continuous improvement in this area and recognises that a truly inclusive culture goes beyond representation; it requires action, equity, and accountability at every level of the business..

Purpose

The purpose of this policy is to set out Pantoro's commitment to fostering a diverse, equitable, and inclusive workplace culture where individual differences are respected, opportunities are based on merit, and all people are treated with fairness and dignity.

This policy aims to:

- Promote diversity across all levels of the Company, including the Board, executive leadership, and workforce
- Ensure that recruitment, selection, development, and promotion practices are free from bias and grounded in equal opportunity

- Encourage inclusive behaviours and workplace environments where individuals feel valued, safe, and empowered to contribute
- Support the setting and achievement of measurable objectives relating to gender and broader diversity outcomes, in accordance with ASX Listing Rule recommendations
- Reinforce compliance with applicable anti-discrimination, human rights, and equal opportunity legislation

This policy applies to all directors, officers, employees, and contractors across Pantoro and its controlled entities.

Principles

Pantoro's approach to diversity, equity and inclusion is guided by the following principles, which reflect our values and our commitment to fair and inclusive business practices:

- **Merit-Based Opportunity:** Employment, promotion, and development decisions are based on merit, capability, and business need, without discrimination or bias.

- **Equal Access and Equity:** All individuals should have equal access to opportunities, resources, and advancement, with fair consideration given to structural or historical barriers.

- **Inclusive Culture:** We promote a workplace where all people feel respected, supported, and safe to contribute regardless of gender, age, ethnicity, disability, sexual orientation, cultural background, or beliefs.

- **Zero Tolerance for Discrimination and Harassment:** We do not tolerate any form of harassment, bullying, or discrimination, and take active steps to address inappropriate conduct at all levels of the organisation.

- **Leadership Accountability:** The Board and executive leadership are responsible for setting the tone from the top, modelling inclusive behaviours, and ensuring measurable diversity objectives are established and monitored.

- **Workplace Flexibility:** We recognise that flexible working arrangements can support greater workforce participation and are committed to providing reasonable flexibility where operationally feasible.

- **Transparency and Reporting:** We commit to tracking, monitoring, and disclosing progress on diversity objectives in our non-financial reporting, in line with ASX expectations.

- **Continuous Improvement:** We recognise that building an inclusive and diverse workplace is an ongoing journey and commit to regularly reviewing our policies, practices, and culture to identify areas for improvement.

Commitments

Pantoro is committed to embedding diversity, equity, and inclusion into its culture, systems, and decision-making processes. In delivering this policy, the Company commits to:

- **Setting Measurable Objectives:** Establish and review measurable objectives for improving diversity across the workforce, senior management, and the Board, in accordance with ASX Corporate Governance Recommendation 1.5.

- **Monitoring and Reporting Progress:** Disclose diversity metrics and progress against objectives in Pantoro's Corporate Governance Statement and relevant ESG disclosures.

- **Supporting Gender Diversity:** Promote gender balance at all levels, with a specific focus on supporting the advancement of women in leadership, technical, and operational roles.

- **Ensuring Inclusive Recruitment:** Implement fair, inclusive recruitment and selection practices that minimise bias and maximise access to diverse candidate pools.

- **Providing Development Opportunities:** Support career development through equitable access to mentoring, training, and leadership pathways, particularly for underrepresented groups.

- **Enabling Workplace Flexibility:** Offer flexible working arrangements where operationally feasible to support workforce participation and employee wellbeing.

- **Addressing Harassment and Discrimination:** Respond promptly to any complaints of discrimination, harassment, or bullying, in alignment with Pantoro's workplace conduct and grievance policies.

- **Raising Awareness:** Promote DEI awareness through regular training, communication, and leadership engagement across all parts of the business.

- **Board Oversight:** Ensure the Board of Directors receives regular updates on DEI performance and remains accountable for the policy's implementation and review.

Performance Indicators

Pantoro will monitor and report on the effectiveness of this policy through the following key performance indicators:

- **Gender Diversity Metrics:**
  - Proportion of women at Board, executive, and senior leadership levels
  - Gender representation across the broader workforce

- **Workforce Composition:**
  - Diversity data disaggregated by age, cultural background, disability, and other relevant dimensions (subject to legal and privacy requirements)

- **Recruitment Outcomes:**
  - Gender and diversity representation in new hires

- **Training Participation:**
  - Completion rates for diversity, equity, inclusion, and unconscious bias training
  - Participation in leadership development and mentoring programs by underrepresented groups

- **Retention and Promotion Rates:**
  - Analysis of promotion and turnover data by gender and other diversity categories

- **Flexible Work Uptake:**
  - Proportion of employees accessing parental leave, including return-to-work rates

- **Grievances and Complaints:**

    - Number and resolution of complaints related to harassment, bullying, or discrimination

- **Disclosure:**
    - Public reporting of measurable diversity outcomes in reporting

Pantoro's Board or its designated committee will review these indicators annually to assess progress, identify barriers, and inform continuous improvement in DEI performance.

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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