



# Employee Code of Conduct Policy

APPROVED BY THE BOARD OF PANTORO GOLD LIMITED

VERSION: 2

## Employee Code of Conduct Policy

### Background

Pantoro Gold Limited (**Pantoro** or the **Company**) is committed to fostering a workplace culture grounded in integrity, professionalism, and accountability. As a responsible mining organisation operating in Norseman, Western Australia, Pantoro recognises that the conduct of its employees directly influences its reputation, operational effectiveness, legal compliance, and relationships with stakeholders.

This *Employee Code of Conduct Policy* provides a clear framework of behavioural expectations for all employees, regardless of their role, location, or level of seniority. It is designed to ensure that every employee understands their responsibility to act ethically, comply with applicable laws, support the Company's policies and values, and contribute positively to Pantoro's workplace and community.

By adhering to this policy, employees play a vital role in upholding Pantoro's values of being Strong, Responsible, Ambitious, Noble, and Honest. These values are reflected in day-to-day conduct, decision-making, and the way employees represent the Company internally and externally.

This policy applies to all employees and contractors of Pantoro, including those in permanent, part-time, casual, and temporary roles, and forms part of the broader governance and risk management framework that supports ethical conduct, legal compliance, and corporate accountability.

### Purpose

The purpose of this policy is to establish clear standards of professional and ethical conduct for all employees of Pantoro. It outlines the behaviours, responsibilities, and values expected of employees in their daily work, interactions, and decision-making, both within the workplace and when representing the Company externally.

This policy is intended to:

- Promote a culture of respect, accountability, and integrity across all Pantoro operations
- Support compliance with applicable laws, regulations, and internal policies
- Protect the reputation, assets, and confidential information of the Company
- Ensure a safe, inclusive, and equitable workplace for all employees and contractors
- Provide a consistent framework for managing conduct-related concerns and guiding disciplinary procedures.

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By adhering to this Code, employees contribute to a professional and responsible work environment that reflects Pantoro's core values and supports its long-term success as a sustainable and ethical mining company.

### Principles

Pantoro's Employee Code of Conduct is guided by a set of core principles that reflect the Company's values and define the standard of behaviour expected across all roles and levels. These principles apply to every employee, contractor, and representative acting on behalf of Pantoro and support a professional, compliant, and values-led workplace.

- **Integrity:** Employees must act honestly, ethically, and in the best interests of the Company at all times, avoiding conduct that could harm Pantoro's reputation or operations.
- **Respect and Fairness:** Employees are expected to treat colleagues, stakeholders, and community members with dignity, courtesy, and fairness, upholding Pantoro's commitment to a safe, inclusive, and non-discriminatory workplace.
- **Accountability:** All employees are accountable for their actions and decisions, and must comply with Company policies, procedures, and applicable laws.
- **Confidentiality and Trust:** Employees must safeguard confidential information and Company assets, using them only for authorised purposes and never for personal gain or external disclosure without approval.
- **Compliance:** Employees must observe all legal obligations and internal policies, including those relating to health and safety, environment, workplace behaviour, and equal opportunity.
- **Professionalism:** Employees must act responsibly and with professionalism in all work-related activities, including communication, use of resources, and interaction with external stakeholders.
- **Transparency and Reporting:** Employees are encouraged to report unethical conduct, conflicts of interest, or breaches of this policy through appropriate channels, without fear of retaliation.

These principles are reinforced through induction, training, and ongoing performance expectations, and are essential to preserving Pantoro's licence to operate and its standing as a responsible employer and mining company.

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### Commitments

Pantoro is committed to maintaining a workplace that reflects the highest standards of integrity, professionalism, and ethical conduct. To uphold these standards, the Company makes the following commitments and expects the same from all employees:

- **Uphold Legal and Ethical Standards:** Pantoro commits to complying with all applicable laws and expects employees to act lawfully and ethically in all business activities.
- **Promote a Safe and Respectful Workplace:** Pantoro ensures a work environment that is safe, inclusive, and free from harassment or discrimination, and expects employees to treat others with fairness and respect.
- **Protect Confidential Information and Company Assets:** Pantoro will safeguard confidential data and resources and expects employees to use Company information, equipment, and facilities appropriately and responsibly.
- **Avoid Conflicts of Interest:** Pantoro expects employees to disclose any actual or potential conflicts of interest and to act in the best interests of the Company at all times.
- **Support Open Communication:** Pantoro encourages employees to raise concerns about misconduct or policy breaches without fear of retaliation and will provide mechanisms for protected reporting.
- **Provide Guidance and Training:** Pantoro will offer training and access to policies to ensure employees understand their responsibilities under this Code and related governance policies.
- **Respond to Misconduct:** Pantoro will take all reported breaches of this Code seriously and will investigate concerns fairly, confidentially, and in accordance with the Company's disciplinary procedures.

### Performance Indicators

Pantoro monitors employee conduct through the following performance indicators to ensure alignment with this policy and to support a values-led, compliant workplace:

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- **Policy Acknowledgement Rate:** Track the percentage of employees who have formally reviewed and acknowledged the Employee Code of Conduct during onboarding and periodic refreshers.
- **Training Completion Rate:** Measure the completion rate of ethics, workplace behaviour, and compliance training modules related to this policy.
- **Conduct-Related Incident Reports:** Monitor the number and type of reported breaches, complaints, or misconduct cases involving employee behaviour.
- **Resolution and Disciplinary Outcomes:** Track the resolution rate of conduct-related cases and the number of formal disciplinary actions taken in response to breaches.
- **Whistleblower Engagement:** Assess the number of reports made through protected channels (e.g. Whistleblower or Ethics Hotline), and their resolution status, to gauge employee confidence in internal reporting systems.
- **Workplace Culture Feedback:** Evaluate employee perceptions of ethical behaviour and respect in the workplace via internal engagement surveys or cultural health checks.
- **Audit Findings:** Record any compliance concerns or policy deviations identified through internal HR or operational audits related to conduct, ethics, or behaviour.

### Grievance and Reporting Mechanisms

Pantoro encourages all employees to speak up if they observe conduct that may breach this Code or any other Company policy. The Company provides multiple channels to raise concerns confidentially and without fear of retaliation.

- **Internal Reporting:** Employees are encouraged to raise concerns or grievances directly with their line manager, supervisor, or the Human Resources department.
- **Formal Complaints:** If a concern cannot be resolved informally, employees

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may submit a formal grievance in writing to OHS team members, a senior manager or to a designated officer responsible for conduct and ethics.

- **Whistleblower Reporting:** For matters involving serious misconduct, corruption, or breaches of law, employees may make a protected disclosure under Pantoro's Whistleblower Policy.
- **Confidentiality and Non-Retaliation:** All grievance reports will be handled sensitively and confidentially. Pantoro prohibits retaliation against anyone who makes a report in good faith.
- **Investigation and Resolution:** Reported concerns will be assessed promptly and, where necessary, investigated thoroughly. Outcomes and actions will be communicated appropriately, and breaches of this Code may result in disciplinary action.

Employees are expected to cooperate with grievance procedures and treat the process with the same integrity and professionalism that underpins this policy.

### 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.

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**Policy Control**

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