Shareholder Communication and Investor Engagement 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 maintaining open, transparent, and effective communication with its shareholders, investors, and the broader financial community. As an ASX-listed entity, Pantoro recognises the importance of timely, accurate, and accessible information to facilitate informed investment decisions and uphold market integrity.

Effective shareholder communication supports good governance, fosters investor confidence, and underpins the Company's long-term value creation. Pantoro also recognises the evolving expectations of stakeholders around Environmental, Social, and Governance (ESG) transparency and is committed to aligning its disclosures with global standards, including the Sustainability Accounting Standards Board (SASB), Global Reporting Initiative (GRI), and Australian Accounting Standards Board (AASB) guidelines.

This policy establishes the framework through which the Company engages with shareholders and investors, including its approach to market announcements, investor briefings, meetings, digital communications, and ESG disclosures. It reflects Pantoro's commitment to equitable access to information, compliance with ASX Listing Rules and the Corporations Act 2001 (Cth), and the integration of emerging best practices in corporate communications and stakeholder engagement.

Purpose

The purpose of this policy is to articulate Pantoro Limited's approach to ensuring timely, transparent, and effective communication with shareholders, investors, analysts, and other key stakeholders. The policy is designed to:

- Support informed investor decision-making by ensuring equal, timely, and balanced disclosure of material information in accordance with ASX Listing Rule 3.1 and the Corporations Act 2001 (Cth)
- Reinforce Pantoro's commitment to ongoing engagement and open dialogue with shareholders and the broader investment community
- Promote confidence in Pantoro's governance and strategic direction through clear and consistent messaging
- Facilitate meaningful participation by shareholders in general meetings and other governance processes
- Enhance accessibility to relevant information through digital platforms and electronic communication channels

- Provide a framework for ESG-related communications, ensuring consistency with global reporting frameworks such as SASB, GRI, and AASB standards

This policy applies to all Pantoro communications with investors and shareholders, including regulatory disclosures, public statements, investor briefings, analyst interactions, and shareholder meetings.

Principles

Pantoro's communication and investor engagement practices are guided by the following principles:

Transparency: Provide accurate, balanced, and complete information to shareholders and the market in a timely manner, avoiding selective or misleading disclosures.

Equal Access: Ensure all stakeholders have equal and timely access to price-sensitive information through ASX disclosures and other approved communication channels.

Continuous Disclosure: Uphold robust continuous disclosure practices in accordance with ASX Listing Rules and the Corporations Act, promptly disclosing material information that may affect the Company's share price or investment decisions.

Regulatory Compliance: Comply fully with legal and regulatory obligations and align ESG disclosures with global reporting frameworks including SASB, GRI, and AASB.

Proactive Engagement: Maintain regular and constructive engagement with shareholders and the broader investment community through briefings, meetings, roadshows, and conferences.

Clarity and Accessibility: Disseminate information in plain language through multiple platforms, including digital and electronic formats, ensuring it is readily accessible and archived for public reference.

Responsiveness: Respond to shareholder queries, feedback, and requests for information in a timely and respectful manner.

Governance Oversight: Ensure oversight of shareholder communication and investor engagement is maintained by the Board and executive management, with regular review of communication strategies and effectiveness.

Commitments

Pantoro is committed to fostering open, transparent, and constructive relationships with its shareholders and the broader investment community. To uphold this commitment, Pantoro will:

- **Maintain Robust Disclosure Controls:** Ensure all market-sensitive information is identified, assessed, and disclosed in accordance with ASX Listing Rules and the Corporations Act.
- **Disclose ESG Performance Transparently:** Communicate the Company's Environmental, Social, and Governance (ESG) performance and risks, aligned with global reporting frameworks such as SASB, GRI, and AASB.
- **Enable Continuous ESG Disclosure:** Maintain a dedicated ESG and non-financial disclosure microsite, developed in partnership with Quantum, to support real-time, structured and accessible reporting. This platform allows investors and stakeholders to track Pantoro's performance across 26 non-financial categories and facilitates disclosures in a user-friendly digital format.
- **Facilitate Two-Way Communication:** Provide regular opportunities for shareholders and investors to engage with directors and executives, including at Annual General Meetings and investor briefings.
- **Leverage Digital Channels:** Utilise digital platforms and the Company website to publish ASX announcements, reports, and updates, ensuring information is accessible, archived, and user-friendly.
- **Respect Insider Trading Laws:** Enforce policies that prohibit the disclosure of material non-public information outside designated communication channels.
- **Monitor and Respond:** Actively monitor investor and shareholder feedback, questions, and concerns, and respond in a timely and respectful manner.
- **Review Communication Effectiveness:** Periodically review communication strategies and update the policy to ensure continued alignment with best practice and regulatory requirements.

Performance Indicators

Pantoro will monitor the effectiveness of its shareholder and investor communication practices using the following performance indicators:

- **Timeliness of Disclosures:** Measure the time taken to release material announcements and disclosures to the ASX following identification of market-sensitive information.
- **AGM and Investor Briefing Participation:** Monitor shareholder attendance and participation rates at Annual General Meetings and other investor forums.
- **Shareholder Satisfaction:** Evaluate shareholder sentiment and satisfaction through direct feedback, surveys, or investor relations correspondence logs.
- **Regulatory Compliance:** Review the frequency and nature of any regulatory breaches, ASX queries, or non-compliance incidents related to market disclosure or investor communications.
- **Media and Analyst Coverage Accuracy:** Assess the accuracy of third-party analyst reports and media commentary based on public disclosures, and identify gaps or misinterpretations requiring clarification.
- **Continuous Improvement Actions:** Track implementation of improvements identified during periodic policy reviews or following stakeholder feedback.

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

Revision Date:	30 June 2025
Version Number:	2.0
Accountable:	Board of Directors
Review Cycle:	Annual