



Human Rights Policy

APPROVED BY THE BOARD OF PANTORO GOLD LIMITED

VERSION: 2

Human Rights Policy

Background

Pantoro Gold Limited (**Pantoro** or the **Company**) operates gold mining and processing facilities in Norseman, Western Australia. Pantoro recognises that the respect and promotion of human rights are fundamental to ethical and responsible business conduct. As a gold mining company operating in diverse and sensitive environments, Pantoro understands the importance of safeguarding the inherent dignity, freedoms, and rights of individuals that may be impacted by our operations, directly or indirectly.

We acknowledge that mining activities can intersect with complex human rights issues, including labour conditions, Indigenous rights, land access, cultural heritage, and community health and safety. As such, we are committed to ensuring that our operations, supply chains, and business relationships uphold internationally recognised human rights standards and avoid causing, contributing to, or being directly linked to human rights abuses.

Pantoro's approach is guided by global frameworks including the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Declaration on the Rights of Indigenous Peoples. We also align with the expectations set out under the Australian Modern Slavery Act 2018 (Cth).

Our commitment to human rights is foundational to our strategy and social licence to operate. It informs how we engage with stakeholders, manage risks, and contribute to positive outcomes for employees, contractors, suppliers, Indigenous groups, and host communities.

Purpose

This Human Rights Policy sets out Pantoro's commitment to respecting and promoting human rights in all aspects of its operations, relationships, and supply chains. The policy serves as a framework to ensure human rights considerations are integrated into our governance, risk management, and operational decision-making.

This Policy applies to all Pantoro employees, contractors, suppliers, joint venture partners, and other business relationships directly linked to our operations.

Through this policy, Pantoro aims to:

- Articulate clear expectations for employees, contractors, suppliers, and business partners regarding the respect for human rights.
- Identify, prevent, and respond to any adverse human rights impacts connected to our business activities.

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- Uphold international standards and comply with relevant Australian legislation, including the Modern Slavery Act 2018 (Cth).
- Reinforce our commitment to ethical conduct, sustainable development, and constructive stakeholder engagement.

This policy underpins Pantoro's broader approach to environmental, social, and governance (ESG) performance and our obligation to operate responsibly in the communities where we work.

Pantoro's approach to human rights is guided by the following core principles:

- **Respect:** We uphold the dignity, freedoms, and rights of all individuals, recognising human rights as universal, indivisible, and interdependent.
- **Due Diligence:** We apply proactive measures to identify, assess, and manage human rights risks across our operations and supply chains.
- **Non-Discrimination:** We foster inclusive workplaces and prohibit discrimination based on attributes such as race, gender, age, disability, religion, sexual orientation, gender identity or expression, or Indigenous status.
- **Freedom of Association:** We respect the rights of employees and contractors to freely associate, form unions, and engage in collective bargaining.
- **Engagement and Inclusion:** We engage meaningfully with stakeholders, including Indigenous communities, and recognise their rights, cultures, and connection to land and waters.
- **Accountability and Remedy:** We provide accessible grievance mechanisms and commit to timely and fair resolution of human rights concerns, including appropriate remediation where we have caused or contributed to harm.
- **Transparency:** We aim to communicate openly on human rights practices, challenges, and progress as part of our broader ESG commitments.

These principles inform how we govern our operations and how we expect our partners and suppliers to conduct their business when working with Pantoro.

Commitments

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Pantoro is committed to respecting and promoting human rights through the following actions:

- **Compliance with International Standards**
Uphold the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the ILO Core Labour Standards, and the United Nations Declaration on the Rights of Indigenous Peoples. Pantoro also aligns with the OECD Guidelines for Multinational Enterprises, ensuring responsible business conduct across human rights, labour, environment, and disclosure practices.
- **Integration of Human Rights into Business Practices**
Embed human rights considerations into corporate policies, operational procedures, risk management frameworks, and decision-making processes.
- **Modern Slavery Prevention**
Conduct due diligence and risk assessments to identify and address risks of modern slavery, forced labour, child labour, and human trafficking in our operations and supply chain, in compliance with the Modern Slavery Act 2018 (Cth).
- **Protection of Workplace Rights**
Pantoro provides fair wages and safe working conditions, promotes physical and psychological wellbeing, and respects the rights of all workers to associate freely and engage in collective bargaining, consistent with ILO Conventions 87 and 98. Pantoro is also committed to paying a living wage that supports an adequate standard of living for all employees, beyond minimum statutory requirements.
- **Indigenous Rights and Cultural Heritage**
Engage respectfully and meaningfully with Indigenous Peoples, recognising their cultural rights and connection to land and waters. Seek to obtain free, prior, and informed consent (FPIC) where applicable.
- **Non-Discrimination and Equal Opportunity**
We prohibit gender-based violence, harassment, and discrimination, and ensure equitable access to safe work, fair remuneration, and leadership opportunities. Performance will be monitored through gender-disaggregated KPIs aligned with SDG 5 (Gender Equality) and the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).
- **Grievance Mechanisms and Remedy**
Maintain accessible, confidential, and effective grievance mechanisms for individuals and communities to raise concerns or report human rights breaches. Commit to investigating complaints fairly and taking appropriate

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remedial actions.

- **Training and Awareness**

Provide training to employees and contractors to build awareness and understanding of human rights responsibilities and encourage a culture of respect.

- **Supply Chain Engagement**

Pantoro will adopt a standalone Conflict Minerals & Responsible Sourcing Policy, aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals. This Policy will be cross-referenced here to emphasise Pantoro's zero tolerance for sourcing materials linked to armed conflict or human rights abuses.

- **Stakeholder Engagement in Policy Development**

Pantoro will consult with potentially affected groups, including women, Indigenous Peoples, and vulnerable communities, in the development, implementation, and evaluation of this Policy. Feedback from these engagements will be documented, integrated into risk management processes, and disclosed transparently in our reporting.

- **Security Practices**

Pantoro will ensure that personnel responsible for site security are trained in and comply with the Voluntary Principles on Security and Human Rights.

- **Due Diligence**

Pantoro conducts ongoing human rights risk and impact assessments across operations and supply chains. We disclose outcomes annually, including the number of assessments undertaken, remediation measures implemented, and effectiveness reviews of grievance mechanisms. Pantoro will publicly disclose the outcomes of human rights risk assessments, stakeholder consultations, and remediation actions annually in its ESG reporting.

Performance Indicators

Pantoro will monitor and report on the effectiveness of its Human Rights Policy through the following key performance indicators, where appropriate:

- **Grievance and Incident Reporting**

- Number and nature of human rights-related grievances received and resolved.
- Time taken to address and remediate substantiated human rights complaints

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- **Training and Awareness**
 - Percentage of employees and contractors who have completed human rights training.
 - Inclusion of human rights content in induction programs and ongoing compliance training.
- **Modern Slavery and Supply Chain Oversight**
 - Completion rate of modern slavery due diligence across Tier 1 suppliers.
 - Number of suppliers assessed for human rights risks and mitigation plans implemented.
- **Workplace Rights and Inclusion**
 - Diversity metrics across workforce (e.g. gender, Indigenous participation).
 - Employee engagement survey results related to inclusion, fairness, and respect.
- **Community and Indigenous Engagement**
 - Number and outcomes of formal engagements with Indigenous groups.
 - Measures taken to protect cultural heritage and fulfil free, prior, and informed consent commitments.
- **Policy Integration and Governance**
 - Inclusion of human rights in enterprise risk assessments and board-level ESG oversight.

These indicators will inform Pantoro's reporting, stakeholder communications, and internal performance management processes.

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
- Human Resources team member

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- 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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