



Responsible Sourcing Standard for Suppliers

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1 Context and Purpose

Responsible Sourcing supports our business in prioritising ethical decision-making when selecting and working with suppliers of goods and services.

The aim of the Responsible Sourcing Standard for Suppliers ('Standard') is to outline the general legal requirements, sustainability, and decent work principles required by suppliers to Platinum. As a condition of working with our business, suppliers must comply with all relevant laws, industry regulations, policies, site requirements, and other supply conditions. This Standard does not replace those requirements and has been designed as a 'Code of Conduct' providing clear and unambiguous guidance for fair and ethical business practices.

These principles form the basis of trusted supplier relationships which are sustainable, supporting each of us to minimise harm to vulnerable individuals, society and our planet.

Our approach to Responsible Sourcing is simple:

- Our supplier management processes require all suppliers, regardless of size, to conduct business fairly, transparently and ethically.
- Due diligence requires all suppliers to provide attestations, complete self-assessment questionnaires and in some cases undertake third party assessments.
- Where breaches or risks are identified, suppliers are expected to take proactive steps to resolve all issues - and implement measures to prevent these from recurring.
- Suppliers who are not able to, or unwilling to provide evidence of improvement, places our businesses at risk. In these cases, we will review our supplier relationship, potentially leading to termination of our contract. We have outlined these expectations in our contracting processes and in the way we evaluate performance.

The objective of the standard is to guide suppliers to:

- Ensure compliance with regulatory requirements
- Identify and manage risk
- Laydown responsible sourcing processes and expectations
- Provide guiding tools

In addition to legal requirements and mandatory disclosures, Responsible Sourcing applies to all suppliers, across all sites. Suppliers are described as, all providers of goods and services to Platinum and its subsidiaries - this includes all agents, traders, contractors, consultants, other forms of intermediaries and as appropriate, other companies within Valterra Platinum who are required, as part of the Company to abide its standards, policies and procedures.

This Standard references various internal Policies as well as external conventions and best practices including recommendations on best practices from various Human Rights conventions, The United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles

on Security and Human Rights and the Conventions of the International Labour Organization (ILO). This Standard is structured across '5 Pillars':

1. Protect safety and health:

Suppliers must protect the safety and health of their workforce – this includes all employees, whether on a permanent, contracted or outsourced basis.

2. Protect our environment:

Suppliers must work together to understand risks, impacts and opportunities to preserve and restore our environment.

3. Respect labour and human rights:

Suppliers must respect labour and human rights within the value chain, promote decent work and commit to combatting Modern Slavery.

4. Contribute to thriving communities:

Suppliers are expected to contribute to activities which support community wellbeing and the protection of heritage.

5. Conduct all business fairly and with integrity:

Suppliers must conduct business with the utmost integrity and always act in a proper manner, fairly and lawfully.

Responsible Sourcing is important to all current and prospective suppliers for the following reasons:

1. Demonstrate compliance with legal requirements:

supports your business to demonstrate compliance to Government authorities and customers as requested.

2. Manage risk:

supports you to implement appropriate controls and management procedures to identify and control business related risk, impact and opportunities across your value chain.

3. Attract and retain customers:

through demonstrating compliance with legal requirements, and striving for best practice, your business will be more attractive to customers by being set apart from your competitors. This builds your reputation and increases trust and loyalty from customers, stakeholders and partners.

4. Sustainability:

By operating responsibly and ethically, your business will become more efficient, safer and benefit from a more engaged workforce who feel respected.

2 Standard

2.1 Our supplier management processes

The supplier management process compels all suppliers to conduct business fairly, transparently and ethically.

- a. Responsible Sourcing supports our business in prioritising ethical decision-making when selecting and working with suppliers of goods and services. This Standard has been developed to provide clear guidance on supplier requirements and our expectations.
- b. The Company may audit and assess our Suppliers' adherence to these Principles through internal and external planned or unplanned assessments or audits at least once per annum or if it comes to the Company's attention that a Supplier has or may be breaching this Standard. The Company expects Suppliers to take concrete actions to close any gaps identified in the application and assessments of these Principles.

Suppliers shall also undertake self-assessments (SAQ's) in measuring the implementation of the Responsible Sourcing Principles. Self-assessment questionnaires or surveys may be used and shall be required as part of the vendor registration process, sourcing events, and routine information update requests.

If the Company has reasonable suspicion that a Supplier has violated the terms of this Policy, it may terminate or restrict its business relationship with the Supplier and/or report such violations to the relevant internal processes and committees.

- c. Various checks and requirements are embedded in our processes, these include:
 - i. During registration and qualification as a supplier:
 - 1) All suppliers are required to agree to legal requirements and company Policies as a supply condition. This includes Responsible Sourcing requirements.
 - 2) Current and prospective suppliers will be subjected to external checks including sanctions, anti-money laundering, anti-bribery, and corruption.
 - 3) Failure to disclose how legal compliance gaps have been addressed, or evidence of steps taken to prevent recurrence will result in a review of your vendor status.
 - ii. During sourcing events:
 - 1) Attestations, Self-Assessment Questionnaires (SAQ's) or other disclosures may be required as part of a Request for Information (RFI), Request for Quotation (RFQ).
 - 2) Suppliers may be required to provide evidence of legal compliance including sanctions, tax compliance, money laundering and anti-terrorism financing.

- iii. As part of an ongoing business relationship:
 - 1) Supply contracts and purchase order terms & conditions (T&C's) highlight our expectation to conduct business legally, and in line with our business requirements.
 - 2) Our contracts further embed requirements for external assessment and third party audit.
 - 3) Our regular supplier reviews may require requests for additional risk and value chain related information.

2.2 Supplier information maintenance

The Supplier is responsible for providing us with information and keeping their SAP Ariba profile up to date, to reduce duplication of cost or effort to demonstrate compliance

- a. Please review and update your 'Supplier Profile' on our SAP Ariba system, at least annually or when information changes, where you may upload evidence of:
 - i. SAQ's completed in the past 24 months,
 - ii. Details of any 3rd party assessments, certification or accreditation conducted on your facilities such as ISO 26001 or SA8000,
 - iii. Details of sustainability, ethical sourcing or similar assessments on behalf of another customer.
 - iv. Updating this data will reduce the number of requests from the Company to demonstrate compliance. We apply a principle of 'mutual recognition' to reduce duplication of effort.

Improving your management systems will reduce your risk.

- b. Management systems refers to a series of procedures, and controls designed to identify and limit operational and legal risk. Principles include:
 - i. Allocating clear responsibilities to staff for risk management.
 - ii. Regular review of different types of risks, impacts, dependencies and opportunities as your business changes.
 - iii. Maintaining up-to-date Policies, workplace procedures and routines to identify and eliminate risk.
 - iv. Where appropriate, conducting training for your workforce and business partners.
 - v. Monitoring and continuous improvement – learning from incidents.
 - vi. Maintaining proper records and documentation – especially those that are required by law.
 - vii. Dealing fairly and transparently with complaints and grievances.
 - viii. Cascading key messages and requirements to your supplier base and business partners.

2.3 Supplier Requirements

All Suppliers must assess against the requirements below. Detailed requirements have been included in Annexure A.

1. Protect Health and Safety

- Maintain a safe and healthy workplace
- Maintain evidence of compliance with applicable legislation, regulations and by-laws
- Demonstrate zero-tolerance to unsafe behaviour
- Conduct safety risk assessments
- All employees to be trained in the safe procedures for work
- Offer unrestricted access to water and maintain a hygienic workspace
- Effectively manage infectious diseases
- Improve safety performance
- If worker accommodation is provided, evidence is maintained to meet legal, health, safety and fire code requirements.

2. Protect our environment

- Demonstrate compliance with all applicable legislation, regulations, by-laws and all applicable guidelines
- Conduct risk assessments and manage environmental risks, impacts and opportunities
- Use water sparingly and responsibly
- Improve circularity
- Reduce workplace energy consumption, striving for zero emissions
- Take steps to protect biodiversity and combat deforestation
- Comply with all Company site requirements

3. Respect labour and human rights

- Not use child labour
- Combat Modern Slavery – eliminating all trafficked, forced, bonded and involuntary prison labour
- Never lodge “security deposits” or retain original worker documents
- Oppose unfair or inhumane treatment of the workforce – eliminating all forms of bullying and harassment
- Permit freedom of association and allow unrestricted access to confidential grievance mechanisms
- Demonstrate that working hours meet legal requirements, with shifts under 12 hours
- Maintain evidence that overtime is voluntary, within legal limits and appropriately compensated
- Maintain fair and Legal terms of employment
- Never make unauthorised or illegal salary deductions

- Eliminate irregular employment
- Eliminate illegal and unfair discrimination
- Promote workplace diversity
- Act against Modern Slavery or Human Rights issues in the value chain

4. Contribute to thriving communities

- Commit to principles of Inclusive Procurement, seeking to employ within and partner with host community businesses.
- Respect the rights of Indigenous communities and individuals
- Comply with all site-specific Social Way requirements
- Ensure that business related activities do not cause disturbance to cultural artifacts or heritage
- For all services rendered on the Company sites – maintain evidence of compliance with the Contractor Performance Management Standard
- Where used, that all security related personnel are trained in the protection of Human Rights

5. Conduct all business fairly and with integrity

- Oppose all forms of bribery
- Not offer gifts, entertainment or hospitality to Company employees
- Never engage in unfair commercial practices
- Manage and declare all conflicts of interest
- Maintain data privacy and information security
- Demonstrate compliance with anti-money laundering laws, anti-terrorism financing laws, tax and trade regulations
- Demonstrate the implementation “whistleblowing” channels
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- Demonstrate the implementation “whistleblowing” channels

3 Glossary

Term/Abbreviation	Definition
CAP	Corrective Action Plan
CDP	Carbon Disclosure Project
Contract	An agreement between two or more parties that creates certain legal rights and obligation that the law will enforce.
GHG	Greenhouse Gas
ICMM	International Council on Mining and Metals
ILO	International Labour Organization
MSDS's	Material Safety Data Sheets
PEP	Politically Exposed Persons
Request for Contract (RFC)	A Request for Contract is a contract request submitted by a Request Originator (or End User) to Supply Chain to source and contract with the preferred supplier to satisfy the scope of work outlined in the provided request.
Request for Information (RFI)	A Request for Information means a request for information, primarily consisting of questionnaires, issued to invited suppliers via the Company authorised sourcing solution
Request for Proposal (RFP)	A Request for Proposal means a request for a proposal, primarily consisting of questionnaires and bid fields/items, issued to invited suppliers via the Company authorised sourcing solution.
Request for Quotation (RFQ)	A Request for Quotation means a request for a quotation has been issued to invited suppliers to bid on specific Goods or Services.
Request for Tender (RFT)	A Request for Tender means a request for a tender, primarily consisting of clearly defined specifications, questionnaires and bid fields/items, issued to invited suppliers via the Company authorised sourcing solution.
Responsible Sourcing	Responsible Sourcing prioritises ethical decision making when selecting and working with suppliers of goods and services to our business.
RFI	Request for Information
RFQ	Request for Quotation
SAQ	Self-assessment Questionnaire
Sourcing Event	A Sourcing Event (or Tender) means the RFI or RFP issued by Valterra Platinum to the invited suppliers via the authorised sourcing solution in relation to the supply of Goods. Services, Work and/or Capital Goods and Services as described in Sourcing Event's materials.
T&Cs	Terms and Conditions

Annexure A: Detailed Supplier Requirements

1. Protect Safety and Health

Suppliers must protect the safety and health of their workforce – this includes all employees, whether on a permanent, contracted or outsourced basis. To this end, all suppliers will:

1.1. Maintain a safe and healthy workplace

- 1.1.1. Suppliers will demonstrate controls to eliminate fatalities, work-related injuries or health impairment of the workforce.
- 1.1.2. Fatalities, injuries and cases of occupational disease incident rates shall be measured and used as a basis to improve performance.
- 1.1.3. Necessary steps must be taken to learn from safety incidents and implement adequate controls to prevent recurrence.
- 1.1.4. Suppliers are encouraged to learn from external safety incidents in your industry and/or choice of equipment and implement practices which limit potential harm to your workforce.

1.2. Maintain evidence of compliance with applicable legislation, regulations and by-laws

- 1.2.1. All safety and health related documentation - including permits, licenses and other records as required by law are to be maintained – evidence of these may be required during sourcing
- 1.2.2. Where applicable, including where recognised as best practice in that industry, suppliers are encouraged to implement 3rd party safety-related certifications (e.g. OSHAS 18001/ ISO45001).
- 1.2.3. Adequate controls need to be in place to prevent the unauthorised use, processing or distribution of sensitive health information which could identify affected individuals.

1.3. Demonstrate zero-tolerance to unsafe behaviour

- 1.3.1. Management responsibilities for the safety of all employees need to be clear, resourced and communicated.
- 1.3.2. All suppliers are to maintain an alcohol and drug free policy for the workplace.
- 1.3.3. Disciplinary procedures will be in place for unsafe work conduct.

1.4. Conduct safety risk assessments

- 1.4.1. Suppliers are required to assess and manage potential safety risks. As applicable, employee communication, written procedures, work instructions and appropriate controls demonstrate how current and residual risk are implemented.
- 1.4.2. Should the workplace pose a likelihood of occupational exposure, employees must receive confidential medical examinations to monitor any potential exposure hazards (e.g. noise, inhalable hazards, dust and excessive vibrations).
- 1.4.3. All sites and operations must maintain an elevated level of emergency preparedness in order to manage potential safety or health emergencies, including fire risk.
- 1.4.4. All employees must have access to emergency medical personnel and facilities.

- 1.4.5. Where applicable, facilities for food preparation, serving and storage need to be sanitary and meet legal requirements – this includes maintaining permits where required by law.

1.5. Employees to be trained in the safe procedures for work

- 1.5.1. Workers shall receive regular health and safety training. This training should be repeated for new or reassigned workers. Suppliers are to maintain recorded evidence of training and legal appointments where required.
- 1.5.2. Where applicable, appropriate personal protective equipment (PPE) must be available for the type of work performed and available at no cost to the employee.

1.6. Offer unrestricted access to water and maintain a hygienic workspace

- 1.6.1. All employees must always have unrestricted access to potable (drinkable) water.
- 1.6.2. All employees shall have unrestricted access to clean lavatory facilities, the number of lavatory facilities available must be in line with legal guidelines (typically 1 toilet per 25 employees), gender appropriate segregation, and supplied with running water and soap.

1.7. Effectively manage infectious diseases

- 1.7.1. Where infectious diseases are prevalent, suppliers should have a clear policy and procedures for addressing these in the workplace.
- 1.7.2. Where applicable, suppliers should have a prevention and treatment strategy linked to programmes of care for those with infectious diseases.
- 1.7.3. Where treatment programmes are provided, these maintain principles of voluntary testing, while ensuring patient confidentiality.

1.8. Contribute to safety performance

- 1.8.1. Suppliers are encouraged to raise and clarify safety and health expectations prior to any contract award to better manage potential legal or site risks
- 1.8.2. Suppliers are encouraged to identify opportunities to improve safety performance through the sharing best practice and observations.
- 1.8.3. Suppliers shall notify the Company of safety related incidents linked to equipment or services provided to other customers and advise on potential preventive actions.

1.9. If worker accommodation is provided, evidence is maintained to meet legal, health, safety and fire code requirements.

- 1.9.1. All provided accommodation must comply with legal requirements, be clean, safe and meet the basic needs of the occupants
- 1.9.2. Evidence to be maintained to demonstrate compliance to fire safety regulations.
- 1.9.3. Accommodation must always have appropriate smoke detectors, audible alarms, first-aid supplies and suitable means of suppressing fire.

2. Protect Our Environment

Suppliers must work together to understand risks, impacts and opportunities to preserve and restore our environment. To this end, all suppliers will:

2.1. Demonstrate compliance with all applicable legislation, regulations, by-laws and all applicable guidelines

- 2.1.1. Suppliers are required to maintain all applicable environmental related documentation - including permits, licenses, emission certificates, safe disposal certificates and other records as required by law.
- 2.1.2. Where applicable, including where recognised as best practice in that industry, suppliers are encouraged to undertake the latest versions of 3rd party responsible environmental management certification schemes (e.g. biodiversity, ISO 14001, ISO 50001, etc.).
- 2.1.3. Dependent on the nature of goods or services being procured - environmental disclosures or certification such as greenhouse gas (GHG) and air emissions, energy efficiency and waste management will remain a supply requirement.
- 2.1.4. Where applicable, suppliers will have to provide additional reporting on environmental performance, nature-related dependencies, impacts, risk and opportunities. These may include disclosures on how environmental risks are managed, including those exacerbated by climate change

2.2. Conduct risk assessments and manage environmental risks, impacts and opportunities

- 2.2.1. Suppliers shall assess and manage environmental risk and impact, maintaining written procedures and work instructions.
- 2.2.2. Chemicals and hazardous materials, including cleaning materials must always be handled safely and disposed appropriately. Evidence of safe disposal may be required.
- 2.2.3. Procedures must be in place to manage the prevention and containment of spillages and other potential accidental discharges.
- 2.2.4. Suppliers shall maintain an elevated level of emergency preparedness to manage any potential environmental emergencies.

2.3. Use water sparingly and responsibly

- 2.3.1. Water usage shall be monitored. Where possible, opportunities to re-use or reduce usage shall be implemented.
- 2.3.2. Measures aimed at improving management of water, monitoring wastewater and other discharges are encouraged.

2.4. Improve circularity

- 2.4.1. Suppliers should eliminate unnecessary packaging and where feasible take it back for re-use.
- 2.4.2. The provision of single use containers to the Company should be avoided where practical and does not impact product quality.
- 2.4.3. Suppliers are encouraged to safely recycle or re-use by-products and consider 'circularity' principles.

2.5. Reduce workplace energy consumption, striving for zero emissions

- 2.5.1. Suppliers shall implement measures aimed at measuring and improving energy consumption and air emissions.
- 2.5.2. For larger suppliers – climate related disclosure towards external standards e.g. CDP will remain as a supply requirement.

2.6. Take steps to protect biodiversity and combat deforestation

- 2.6.1. Demonstrate compliance with the Company Biodiversity Standards and Guidelines which defines the key objectives and minimum mandatory requirements for biodiversity management.
- 2.6.2. As applicable, large suppliers may be required to disclose biodiversity measures aligned to the ICMM Nature position statement – this compels reporting on key sourcing locations and product distribution routes with significant nature related risk.
- 2.6.3. As applicable, large suppliers will be required to complete a materiality assessment of nature-related risks, impacts, dependencies and opportunities for direct operations and within the value chain.
- 2.6.4. Large suppliers are encouraged to identify opportunities for collaboration and engage high nature-risk suppliers to disclose measures aimed at limiting environmental impact and deforestation.
- 2.6.5. As applicable, evidence of mandatory reporting requirements are to be maintained.

2.7. Comply with all Company site requirements

- 2.7.1. Suppliers conducting work on, or supplying directly to Company sites must comply with all site specific environment requirements, failure to do so will result in review of the supply agreement.
- 2.7.2. All site-based contractors must obtain requisite written approval should activity result in land disturbance or biodiversity impact e.g. cutting down of trees, etc.
- 2.7.3. All hazardous or harmful materials and chemicals brought onto site must be approved by the respective hazardous materials management coordinator. All materials must be accompanied with up to date Material Safety Data Sheets (MSDS's), supplied in properly labelled packaging and handled with appropriate care.
- 2.7.4. Persons performing work on site will ensure that all chemicals brought onto site, and any waste generated through their activities, are properly segregated, stored and disposed of in accordance with legal requirements and evidence of safe

3. Respect Labour and Human Rights

The Company is a proud signatory to the United Nations Guiding Principles on Business and Human Rights.

Suppliers should consider the following actions:

- Develop a policy commitment on human rights
- Take measures to prevent, mitigate and remediate infringements associated with business activities - encouraging your suppliers to do the same
- Provide or allow access to a grievance mechanism (YOURVOICE)

Suppliers must respect labour and human rights within the value chain, promote decent work and commit to combatting Modern Slavery. To this end, all suppliers will:

3.1. Not use child labour

- 3.1.1. The age of labour shall always be the higher of a) national legislation or b) ILO minimum age convention or c) 'light work' at a minimum of 15 years and hazardous work at a minimum of 18 years.
- 3.1.2. Practices shall be in place to prohibit the new recruitment of child labour.
- 3.1.3. In territories where 'light work' is allowed for young workers, employers shall assure that such work is not a) economically exploitive, or b) harmful to the physical, mental, spiritual or moral wellbeing, social development or education and training of young workers

3.2. Combat Modern Slavery – eliminating all trafficked, forced, bonded and involuntary prison labour

- 3.2.1. Suppliers must demonstrate appropriate mechanisms to evaluate and address risks of modern slavery and human trafficking.
- 3.2.2. Evidence of procedures to prohibit the use of human trafficking when recruiting employees may be requested.
- 3.2.3. Suppliers are encouraged to increase visibility and raise awareness of modern slavery and human trafficking risk with business partners.
- 3.2.4. No employee, including employees of suppliers' sub-contractors, shall pay for the right to work i.e. direct payments to the supplier or any recruitment fees.
- 3.2.5. Employers must demonstrate evidence that all legitimate fees and any related costs associated with the recruitment of workers are borne by the company and not employees. This includes employees recruited or employed by external agencies or other 3rd parties.
- 3.2.6. As applicable, evidence of mandatory reporting on Modern Slavery or Human Rights are to be maintained – these will be required by the Company as a supply requirement.

3.3. Never lodge “security deposits” or retain original worker documents

- 3.3.1. Original identity or travel documents of employees shall never be retained. All original documentation must be returned to the employees.

- 3.3.2. No prospective employee shall be required to lodge any “deposits” or other refundable securities to a recruiter or other representative. Suppliers shall neither deduct nor withhold any salary portion towards security deposits.

3.4. Oppose unfair or inhumane treatment of the workforce – eliminating all forms of bullying and harassment

- 3.4.1. Suppliers must adopt a ZERO TOLERANCE approach to all forms of inhumane treatment within the workplace (or work related events, travel, functions and in recruitment processes). This includes acts of bullying, harassment and/or victimisation whether physical, verbal or nonverbal, including conduct that is not face-to-face, including via text message, email and social media (cyber-bullying).
- 3.4.2. Employers are expected to create policies and implement training programmes to increase awareness of worker rights, including the acceptable treatment of the workforce.

3.5. Permit freedom of association and allow unrestricted access to confidential grievance mechanisms

- 3.5.1. The right of the workforce to raise concerns, collectively bargain, join trade unions, workplace forums or other similar organisations must be respected.
- 3.5.2. Suppliers must ensure that there is zero retribution against employees who raise grievances or wish to participate in forums which allow for collective bargaining.
- 3.5.3. As applicable, evidence of compliance for legislative requirements for free association are to be maintained.
- 3.5.4. All employees must have unrestricted access to grievance mechanisms to raise any potential workplace concerns – where this is not available, employees are to be provided with details of the Company Grievance mechanism/service.

3.6. Demonstrate that working hours meet legal requirements, with shifts under 12 hours

- 3.6.1. Working hours shall be the lower of ILO guidelines or National legislation. In the absence of special Industry dispensations or written directives by the respective government ministry, this is generally limited to 40 hours per week, excluding overtime.
- 3.6.2. Working hours, inclusive of overtime, shall not exceed 12 hours in any 24-hour period unless a written directive is provided through an Industry dispensation or the respective Government Ministry.
- 3.6.3. A minimum of 24 consecutive hours of rest shall be provided within every 7-day period.

3.7. Maintain evidence that overtime is voluntary, within legal limits and appropriately compensated

- 3.7.1. Overtime shall never be excessive, not be regular and remain voluntary. Evidence of voluntary overtime e.g. sign-up sheets will be requested.
- 3.7.2. Overtime shall always be compensated premium rates as prescribed by legislation.

3.8. Maintain valid employment contracts for all workers

- 3.8.1. All terms of employment shall, at minimum, meet National legal or as applicable, Industry specific conditions – the elements required by law need to be included in employment contracts.
- 3.8.2. All employees must be provided with a signed copy of their employment contract, in a language that they understand.
- 3.8.3. Where 3rd parties are used for recruitment, employers are required to screen and evaluate potential recruiters and agencies to ensure compliance with legal requirements, and that contracts are issued to all externally provided labour.

3.9. Worker salaries must always be in line with, or higher than legal requirements

- 3.9.1. All wages and benefits shall, at minimum, meet legal requirements. Suppliers may be required to demonstrate that, where applicable, salaries paid to employees comply with National law, Industry agreed rates, relevant regulation or as agreed through a collective bargaining agreement.
- 3.9.2. Deductions from wages – either as a disciplinary measure, or those not permitted by National law - will never be tolerated.
- 3.9.3. All employees must be provided with payslips, prior to payment. Payslips should, at minimum, contain details of working time, compensation and applicable deductions.
- 3.9.4. Where loans are provided to employees, these are to be done in accordance with responsible lending practices and any prevailing laws. Loans shall never increase risk of modern slavery or result in debt bondage.
- 3.9.5. Suppliers are encouraged to consider “living wage” principles when determining salary scales for employees. A living wage is a level of pay that gives workers a decent standard of living and enough pay to afford basic needs.

3.10. Eliminate irregular employment

- 3.10.1. Regular employment must be provided. Suppliers must recognise tenure of work service and eliminate the use of short-term or temporary contracts which avoid or reduce legally mandated benefits and entitlements for workers.
- 3.10.2. All probationary periods for new employees must be consistent with legal requirements.

3.11. Eliminate illegal and unfair discrimination

- 3.11.1. All forms of illegal or unfair discrimination shall be eliminated. This includes discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, or on the basis of real or perceived HIV/AIDS status or other infectious diseases.

3.12. Promote workplace diversity

- 3.12.1. Suppliers are encouraged to promote workplace diversity, striving to create an environment where individuals are respected and bring their ‘whole self’ to work.

3.13. Act against Modern Slavery or Human Rights issues in the value chain

- 3.13.1. increase value chain transparency to understand residual risks in your value chain. This can be achieved by Modern Slavery risk assessments aimed at mapping key sources of goods, products or services used by your company.
- 3.13.2. Suppliers are encouraged to identify key suppliers at all levels of your value chain (Tier 2, Tier 3+) and associated origin and/or supply risk.
- 3.13.3. Where risks pose potential for adverse reputation or impact supply reliability, suppliers are encouraged to work towards mitigating those risks.

4. Contribute to Thriving Communities

The Company remains committed to building resilient mining host communities. Suppliers are seen as an extension of our business and are therefore expected to contribute to activities which supports community wellbeing and the protection of heritage. To this end, all suppliers will:

4.1. Commit to principles of Inclusive Procurement, seeking to employ within and partner with host community businesses.**4.2. Respect the rights of Indigenous communities and individuals**

- 4.2.1. Respect the human rights of Indigenous communities, including their traditions, customs and cultural heritage, treat all individuals with respect.
- 4.2.2. Seek to avoid, minimise, mitigate and remediate potential negative impacts and risks arising from its activities.

4.3. Comply with all site-specific Social Way requirements

- 4.3.1. As part of the sourcing process, review the Social Way requirements and clarify performance expectations with the Company.
- 4.3.2. Demonstrate procedures to support grievance and incident management processes.
- 4.3.3. Consider impact of climate change caused by your operations, the potential impact on communities and the adoption of strategies to build community climate resistance.
- 4.3.4. Maximise local employment, local and inclusive procurement, and local training opportunities as per site procedures and requirements.
- 4.3.5. Refrain from making commitments to external and community stakeholders on the site's behalf

4.4. Ensure that business related activities do not cause disturbance to cultural artifacts or heritage**4.5. For all services rendered on the Company sites – maintain evidence of compliance with the Contractor Performance Management Standard****4.6. Where used, that all security related personnel are trained in the protection of Human Rights**

- 4.6.1. Providers of security related services to the Company sites, including where contractors have their own security provisions, these shall adhere to local law and to the Voluntary

Principles on Security and Human Rights and be coordinated with the site's Security Management Plan.

- 4.6.2. Evidence of training in the protection of human rights is a requirement for all personnel who provide security related services to Company

Socio-economic development activities takes many forms:

Our Social Way Toolkit (Section 4A)* provides a universal framework for alignment of socio-economic activities, these principles include:

- Identifying opportunities for local employment and skills transfer.
- Transfer of critical skills to host communities.
- In consultation with the Company, conduct transparent and inclusive procurement aimed at increasing the participation of host community businesses in your value chain.
- In consultation with the Company, financial contributions towards socio economic development activities and/or social projects.
- Working collaboratively on initiatives which improve host community well-being.

5. Conduct Business Fairly and with Integrity

Suppliers must conduct business with the utmost integrity and always act in a proper manner, fairly and lawfully. To this end, all suppliers will

5.1. Oppose all forms of bribery

- 5.1.1. Suppliers shall neither give nor accept bribes, kickbacks or facilitation payments, nor permit others acting on their behalf to do so.

5.2. Not offer gifts, entertainment or hospitality to the Company employees

- 5.2.1. Suppliers, their employees and contractors must not offer items to the Company personnel as this could be perceived as a means to gain unfair advantage. This includes but is not limited to offers of gifts, entertainment and hospitality or similar acts.
- 5.2.2. Where the Company personnel request or demand facilitation fees, gifts, entertainment or hospitality – these are to be immediately reported using the grievance mechanism

5.3. Never engage in unfair commercial practices

- 5.3.1. Suppliers must not engage in any practices involving corruption, anti-competitive business practices, tax evasion, or any acts that could be perceived as market abuse or manipulation.

5.4. Manage and declare all conflicts of interest

- 5.4.1. Suppliers must appropriately manage actual or perceived conflicts of interest when working with the Company.
- 5.4.2. All potential conflicts of interest must be declared in advance of any dealings with the Company.

- 5.4.3. Suppliers are reminded of the risk of association with “politically exposed persons” (PEP) and declare these risks in all dealings with the Company.

5.5. Maintain data privacy and information security

- 5.5.1. Suppliers must safeguard against the improper use, loss, theft, abuse, unauthorised access or disposal of Company or third-party information, assets and property, reporting any incidents promptly and collaborating with the Company on potential investigation and resolution.
- 5.5.2. Suppliers must comply with all applicable privacy legislation – including the protection of personal information laws.
- 5.5.3. Suppliers must never use Company data for any purpose other than what is agreed with the Company.
- 5.5.4. Suppliers will be required to provide assurance and evidence that contractual and legal requirements relating to data privacy are met.
- 5.5.5. Where appropriate, suppliers are requested to raise concerns relating to sharing sensitive information with the Company, ensuring that appropriate non-disclosure.

HOW TO USE YOUR VOICE

All suppliers, including their employees, business associates or others may use the independently managed ‘YOURVOICE’ facility to report any potential or actual breach of Company requirements, Legal requirements or inappropriate behaviours exhibited by the Company staff.

For further information about YOURVOICE, including full contact details, please visit the Company Website.

5.6. Demonstrate compliance with anti-money laundering laws, anti-terrorism financing laws, tax and trade regulations

- 5.6.1. Suppliers must comply with all applicable laws relating to the prevention of money laundering and to the combating of terrorism.
- 5.6.2. Suppliers must comply with all applicable tax and trade laws (including economic sanctions and import and export laws).
- 5.6.3. A refusal to declare potential exposure, or refusal to provide evidence of remediation of these legal breaches will result in review and potential termination of the supply agreement.

5.7. Demonstrate the implementation “whistleblowing” channels

- 5.7.1. Suppliers are expected to be transparent and accountable in their business dealings. To that end, suppliers are required to adopt confidential “whistleblowing” channels to raise concerns and workplace grievances.
- 5.7.2. Whistleblowing processes should ensure that there is zero retribution to persons who raise concerns in good faith.
- 5.7.3. Where not available, suppliers are encouraged to use the Company grievance mechanism to report any potential violations, suspicious, illegal or unethical behaviour.