

Bathurst Resources Limited

Modern Slavery Policy

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1.0 Objective

Bathurst is determined to support the fight against modern slavery in all its forms.

The purpose of this policy is to ensure that modern slavery has no place in Bathurst's operations or its supply chains, and to support our partners in their own efforts to stamp out modern slavery.

2.0 Who this policy applies to

This policy applies to all persons who work for or on behalf of Bathurst in any capacity, including employees, directors, consultants and any other third-party representatives.

We also expect all who have or seek to have a business relationship with Bathurst to be familiar with and support this policy.

3.0 Scope of this policy

This policy is to be read in conjunction with other Bathurst policies including the Code of Conduct and Whistle-blower Policy and is not intended to supersede other Bathurst policies.

4.0 What is modern slavery?

Modern slavery involves situations where a person cannot leave due to threats, violence, coercion, deception and/or an abuse of power. It includes any activity, practice or conduct that would constitute an offence in relation to:

- forced labour;
- involuntary servitude;
- debt bondage;
- human trafficking; and
- other slavery-like exploitation.

Exploitation involves behaviour that would cause or increase the risk of material harm to the economic, social, physical or emotional well-being of a person, and may be tied into modern slavery practices. Exploitation of workers includes non-minor breaches of employment standards, including but not limited to:

- breaches of minimum wage requirements;
- breaches of rest and meal break requirements; and
- failure to provide annual holiday entitlements.

Throughout this policy, a reference to modern slavery is also a reference to worker exploitation.

5.0 Preventing modern slavery

We will take the following steps to prevent modern slavery in our business and in our supply chains:

1. Undertake due diligence to assess the risk of modern slavery existing in our operation and supply chains.
2. Implement appropriate contractual terms and processes to combat modern slavery within our supply chains.
3. Provide education and training to our team on the prevention of modern slavery.
4. Take reasonable and proportionate action to eliminate modern slavery if we become aware of it in our operations or supply chains.
5. Enable mechanisms for the reporting of any concerns.
6. Disclose the steps we are taking to address modern slavery.

6.0 Due diligence

We will implement a formal due diligence process to assess and seek to eliminate the risk of modern slavery in our operations and supply chains.

Our due diligence process will involve the following steps:

- assessing the risk of modern slavery within each part of our operations and each element of our supply chain;
- implementing reasonable and proportionate measures to manage and address identified risks; and
- implementing systems to evaluate and review those measures on an annual basis.

We will ensure that these due diligence measures are taken not just within our core business and its supply chain, but also any businesses which we own or control and their supply chains.

7.0 Supply chain procedures

As well as ensuring that due diligence procedures are applied when selecting and monitoring our supply chains, we will ensure that any contracts with suppliers will include appropriate provisions to help eliminate modern slavery.

These contractual provisions will:

- require suppliers to comply with all relevant laws and international standards;
- require suppliers to comply with the Supplier Code of Conduct found at Schedule 1;
- require suppliers to provide evidence of compliance;
- allow Bathurst to audit any evidence of compliance; and

- allow Bathurst to terminate if a supplier is unable or unwilling to comply and/or engages in modern slavery.

8.0 Education and training

We will seek to ensure all our workers and suppliers are informed about Bathurst's position on modern slavery.

For those whose roles or positions are directly involved in our relevant operations or supply chains, we will provide training to ensure that this policy and relevant laws against modern slavery are observed.

If you wish to receive any education or training in relation to this policy or modern slavery more generally, we encourage you to reach out to General Manager - People and Culture at Carmen.Dunick@bathurst.co.nz or +64 4 974 5918 extn 5918.

9.0 Action in response to modern slavery or worker exploitation

If we become aware of modern slavery in Bathurst's operations or its supply chains, including the operations or supply chains of our subsidiaries, we will take immediate action.

Our response will be appropriate and proportionate based on a wide range of factors, including the circumstances of the discovered modern slavery, the interests of those suffering it, our legal obligations and the influence we have over our suppliers.

Responses may include:

- investigations;
- reporting to the appropriate authority, such as the Labour Inspectorate;
- supporting impacted people through offering remediation and/or other services;
- changes in our organisation or methods of working;
- disciplinary action against involved employees; and
- terminating a contract with a supplier.

10.0 Disclosure – Modern Slavery Statement

We will report on the risks of modern slavery in our operations and supply chains, and the actions we are taking to address those risks. This will be done through an annual 'Modern Slavery Statement', in compliance with the Australian Modern Slavery Act 2018 (pending legislative reform of New Zealand laws, at which time this policy will be modified) and any other relevant legislation.

Our Modern Slavery Statements will, at minimum:

- identify Bathurst and describe our structure, operations and supply chains;

- describe the risk of modern slavery and worker exploitation at Bathurst and any entities owned or controlled by us;
- describe the actions taken by Bathurst and our owned or controlled entities to assess and address these risks, including due diligence and remediation efforts;
- describe how the effectiveness of these actions is monitored and evaluated; and
- describe the process of consultation with our owned or controlled entities.

11.0 I have concerns that I want to report. What should I do?

We will maintain a reporting mechanism for concerns or disclosures in relation to modern slavery.

If you wish to report a concern regarding potential conduct of modern slavery in our operations or supply chains, please contact General Manager People and Culture at Carmen.Dunick@bathurst.co.nz or +64 4 974 5918 extn 5918.

Some concerns relating to modern slavery may fall under the Bathurst Whistle Blower Policy. We encourage you to familiarise yourself with that policy and report such concerns in accordance with it. The Whistle Blower Policy can be accessed via the Bathurst policy manual located within Te Kete, the Bathurst intranet.

12.0 General

Bathurst may vary or rescind any policies or procedures from time to time in its absolute discretion without notice and without any limitation on its capacity to do so. This policy does not form part of any employee contract and Bathurst also reserves the right to depart from this policy as it sees fit.

13.0 Questions

Any questions about this policy should be directed to the Company Secretary or HR Manager.

Last reviewed and adopted: 20 September 2024

Schedule 1 – Supplier Code of Conduct

Objective

Bathurst Resources Limited (**Bathurst**) and its related companies are committed to the elimination of modern slavery and worker exploitation within their supply chains.

We seek to work with suppliers who share our commitment to addressing modern slavery and aim to ensure that we do not do business with suppliers who knowingly profit from exploitative conduct.

To help achieve these goals, this Supplier Code of Conduct (**Code**) sets out the minimum standards that we expect our suppliers to observe and confirms that there are potential consequences if they do not.

Scope

This Code applies to all suppliers of Bathurst and its related companies.

Suppliers are expected to be aware of and comply with this Code, as well as the Bathurst Modern Slavery Policy, and any other relevant policies and procedures of Bathurst notified to them together with obligations under applicable legislation and/or international law.

Suppliers are responsible for communicating this Code to their employees and suppliers, and for taking action to address non-compliance.

Modern slavery and worker exploitation

Modern slavery for the purposes of this Code means any activity, practice or conduct that would constitute an offence in relation to slavery, forced labour, involuntary servitude, debt bondage, human trafficking, and other slavery-like exploitation as prohibited under applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Criminal Code Act 1995 (Australian Cth), sch 1, divisions 270 and 271, the Modern Slavery Act 2015 (UK), sections 1, 2 and 4 and any applicable legislation in New Zealand. It also includes any conditions or practices similar to those prohibited under those laws.

Worker exploitation for the purposes of this Code means any conduct that may cause or increase the risk of material harm to the economic, social, physical or emotional well-being of a person, and may be tied into modern slavery practices. It includes non-minor breaches of employment standards, including but not limited to minimum wage requirements, rest and meal break requirements; and failure to provide annual holiday entitlements.

Minimum standards

Suppliers will put in place reasonable measures to identify and then eliminate modern slavery and worker exploitation from their organisations and their own supply chains. In doing so, as a minimum (and without limiting the general requirement), suppliers will observe the following minimum standards.

1. Voluntary work

Suppliers will ensure that all work is voluntary, and will not use any form of slave labour, forced labour, bonded labour, or indentured labour. Suppliers will not restrict the movement of their workers or take any action to prevent them from terminating their employment.

2. No child labour

Suppliers shall comply with minimum legal working age requirements. Where there is no law, suppliers will abide by the International Labour Organisation Convention 138.

Suppliers must ensure effective systems to prevent the use of child labour.

3. Payment of wages

Suppliers will comply with all applicable laws relating to wages and benefits, including payment of minimum wage and rules around deductions. Workers shall be paid lawful wages, including equal pay for equal work.

4. Working hours

Suppliers will comply with all applicable laws related to working hours, including rules relating to rest breaks, meal breaks and overtime.

5. Record-keeping

Suppliers must keep accurate time, wage and other records in accordance with applicable law, and with sufficient detail to demonstrate compliance with minimum employee entitlements.

6. Freedom of association

Suppliers shall respect the rights of workers to lawfully associate and shall not interfere with, obstruct or prevent legitimate activities of legal unions, such as collective bargaining.

Employees of suppliers shall not face any discrimination or disadvantage based on their membership or non-membership of a union or similar association.

7. No discrimination

Suppliers will not discriminate against any person based on sex, marital status, religious or ethical belief, colour, race, ethnic or national origins, disability, age, political opinion, employment status, family status, sexual orientation or any other status protected by applicable law.

8. No harassment or abuse

Suppliers will provide a workplace free from harassment, bullying or abuse, whether verbal, physical, sexual or visual.

Compliance

Suppliers are expected to engage in risk management practices and monitor compliance with the Code. Suppliers are also expected evaluate their own supply chains to ensure compliance with the Code.

Suppliers should maintain appropriate documents and records to ensure compliance and have a process for correction of deficiencies or violations identified.

Bathurst reserves the right to monitor and audit suppliers' compliance with the Code and expect suppliers to cooperate and provide relevant information.

Notification

Suppliers shall immediately notify Bathurst if they become aware of any potential instance of modern slavery or worker exploitation in their own organisation or their supply chain.

Breach

Breaches of this Code may negatively impact a supplier's business relationship with Bathurst, which may mean (but not be limited to) contract termination.