

1. INTRODUCTION

This Supplier Code of Conduct sets out the minimum standards which all of Gold Road's Suppliers are required to comply with.

It also states the values and higher standards that Gold Road adopts and encourages our Suppliers to share with us, which will be taken into consideration in the selection of Suppliers.

2. BEHAVIOURS

Gold Road favours Suppliers that share similar values, including "We care for the wellbeing of all", "We act with integrity", "We deliver", "We innovate to improve" and "We work as one team".

In line with Gold Road's values, Gold Road requires Suppliers to comply with the following minimum requirements:

- Never engage in bribery or corruption (directly or through intermediaries).
- Act all times with integrity, transparency and honesty, in particular:
 - never engaging in fraud, tax evasion, money laundering or insider trading;
 - maintaining accurate books, records and accounts;
 - not engage in deceptive or misleading practices;
 - complying with all legal requirements, and reporting any breaches of law; and
 - ensuring the protection of whistleblowers.
- Must comply with internationally proclaimed human rights, including:
 - freedom from forced labour;
 - freedom from child labour;
 - freedom from discrimination at work; and
 - freedom to form and join a union, and to bargain collectively.
- Must comply with all applicable modern slavery laws, including not engaging in human trafficking, slavery, servitude, forced labour, forced marriage, deceptive recruiting for labour and services, debt bondage and child labour.
- No violence, or threats of violence in the workplace or any harassment or bullying in any form.
- Comply with data privacy and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.
- Declare any actual or potential conflicts of interest in dealings with Gold Road, and ensure any gifts or hospitality are reasonable, appropriate, not overly frequent and for legitimate business purposes.
- Respect confidential information.

3. HEALTH AND SAFETY

Gold Road favours Suppliers who demonstrate the value of “We care for the wellbeing of all” and have a documented set of policies and programs, and a targeted culture, aimed at promoting a safe, healthy and secure workplace.

Gold Road requires Suppliers to comply with the following minimum requirements:

- Comply with all relevant laws and regulations related to workplace health and safety;
- Ensure a safe workplace and maintain appropriate workplace health and safety practices;
- Report accidents and unsafe work practices to your immediate manager, or a health and safety representative on site, and to Gold Road if on a Gold Road site; and
- Where applicable, unless agreed via contract, adhere to Gold Road’s health and safety requirements at all Gold Road sites.

4. ENVIRONMENT AND SUSTAINABILITY

Gold Road aims to reduce the impact of its operations, and the activities of its supply chain, on the environment. Gold Road will give preference to those Suppliers who act responsibly in managing the environmental impacts of their business operations.

Gold Road requires Suppliers to comply with the following minimum requirements:

- Comply with all relevant laws and regulations relating to environmental issues, management and reporting;
- Maintain a process aimed at tracking environmental performance over time and supporting environmental reporting and compliance with legislative requirements; and
- Where applicable, unless agreed via contract, adhere to Gold Road’s environmental requirements at all Gold Road sites.

5. COMMUNITY

Gold Road recognises that its activities should create business opportunities in its host communities. The Company recognises and respects the Traditional Owners of the land where it operates. Gold Road will prioritise those suppliers who:

- Utilise local employees, products or services in their business;
- Have indigenous ownership or who demonstrate affirmative action to increase indigenous employment in their business; and
- Respect the heritage, cultural values, traditions and beliefs of indigenous people.

6. COMPLIANCE

The requirements outlined in this document are important to Gold Road and its reputation.

Gold Road will continue to adopt and apply systems, practices and processes to monitor, assess and ensure Supplier's compliance with this Code, including seeking written confirmation of their acceptance and compliance.

If a Supplier finds it difficult to comply with the requirements in this Code, this should be reported and shared with a Gold Road representative.

Gold Road aims to work with Suppliers to develop and implement corrective action plans where possible, in line with its value of "We work as one team". However, serious breaches or continued non-compliance with this Code may lead to suspension or termination of the supply of goods or services from the Supplier.

7. RAISING CONCERNS

Where you have serious concerns about non-compliant behaviour by a Gold Road employee or a Supplier in relation to this Code, a report should be made under Gold Road's [Whistleblower Policy](#).

Gold Road facilitates anonymous reporting via an external service provider under its Whistleblower Policy.

8. PERIODIC REVIEW

Gold Road shall monitor compliance with the Code periodically by liaising with the Board, Suppliers and employees, especially in relation to any areas of difficulty which arise from the Code and any other ideas or suggestions for improvement of the Code. Suggestions for improvements or amendments to the Code can be made at any time by providing a written note to the Company Secretary.

This policy is to be reviewed on an annual basis by the Company Secretary in consultation with the Managing Director and CEO and Chair of the Risk and ESG Committee, and presented to the Risk and ESG Committee for review and recommendation to the Board.

9. DEFINITIONS

Code means this Supplier Code of Conduct.

Company means Gold Road Resources Limited.

Company Secretary means the Company Secretary of Gold Road Resources Limited.

Gold Road means Gold Road Resources Limited.

Supplier means all third party suppliers, employees of suppliers and contractors engaged to provide any goods and services required throughout Gold Road's (or any of its wholly owned or controlled entities or managed operations) supply chain.

10. KEY ASSOCIATED POLICIES

- [Gold Road Values](#)
- [Human Rights Policy](#)
- [Whistleblower Policy](#)
- [Anti-bribery and Corruption Policy](#)
- [Securities Trading Policy](#)

11. DOCUMENT CONTROL

Version Number	Revision Date	Document Owner	Document Approver
Version 1.1	11 December 2020	Company Secretary	Board of Directors