

HUMAN RIGHTS POLICY



Gold Road is committed to respecting human rights and believes that all people should be treated with dignity and respect, in line with our values “We care for the wellbeing of all” and “We act with integrity”.

Gold Road seeks to create positive social impacts by mitigating human rights related risks and promoting respect for human rights across our operations and activities.

We are committed to promoting gender diversity and addressing Indigenous disparity in our workforce and the areas that we operate.

As a part of our commitment to respecting human rights, Gold Road will:

- Work to align our business activities and practices with the *UN Guiding Principles on Business and Human Rights*;
- Treat our employees fairly and without harassment or discrimination, and promote diversity in the workplace;
- Recognise the rights of our employees to allow freedom of association and collective bargaining;
- Take actions to facilitate the prevention of work-related risks and health hazards;
- Reject any form of slavery, forced or child labour, and work to ensure that such practices are not present in our business or our supply chain;
- Through appropriate due diligence programs, seek to avoid knowingly engaging in business activities where it could be complicit in human rights abuses, including *Modern Slavery Act 2018* requirements;
- If Gold Road discovers that it is (or may be) associated with human rights violations, appropriate action will be taken in a timely manner;
- Respect the human rights of the communities in which we operate;
- Proactively engage with stakeholders on human rights issues and provide an easily accessible complaints mechanism to resolve grievances in a timely manner;
- Recognise the rights of Indigenous peoples, acknowledging their connections to lands and waters and respecting their culture;
- Seek to identify and report on adverse human rights impacts and take appropriate steps to avoid, minimise and/or mitigate them;
- We will make contractual commitments with suppliers that encourage them to adhere to the same principles contained in this policy statement.
- Maintain a due-diligence program with our supplier base that includes specific reviews focused on child and slave labour and human trafficking. We will audit new and existing suppliers to ensure they comply with our human rights requirements. These audits will be focused where risks regarding human rights concerns are greatest; and
- Communicate this policy and ensure compliance with our Code of Conduct, environmental, health, and safety standards, our human rights standard, and our Values to all stakeholders, including employees, contractors and suppliers, and third parties working within our supply chains, and provide human rights training to relevant employees.

Respect for human rights is embedded in other Gold Road policies and management systems, including the Corporate Code of Conduct, Supplier Code of Conduct and Diversity and Inclusion Policy.

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The Risk and ESG Committee is charged with the oversight of the Company's Risk Management Framework and processes, which includes Human Rights risks for the business, its people and supply chain as well as the adequacy of the processes in place to effectively manage these risks. Human Rights risks are captured in Gold Road's risk register together with corresponding risk mitigation strategies.

Gold Road is committed to addressing human rights grievances and providing appropriate avenues for affected individuals or communities to come forward. Suspected or actual breaches of this policy should be reported in accordance with Gold Road's grievance procedure.

Gold Road is committed to continuously improving its mechanisms and remediation processes through stakeholder engagement and dialogue, to better align with the expectations for effective mechanisms set out in the *UN Guiding Principles on Business and Human Rights*.

The Risk and ESG Committee will periodically review the effectiveness of Gold Road's Human Rights Policy to ensure it remains relevant to the needs of Gold Road and its stakeholders.

Version Number	Revision Date	Document Owner	Document Approver
Version 2.0	8 September 2021	GM Social Performance and External Relations	Board of Directors