

1. PURPOSE

Gold Road Resources Limited (**Gold Road** or **the Company**) recognises Indigenous peoples as the traditional owners of the lands on which it operates. We acknowledge the unique and continuing connection of those peoples to those lands and the custodial responsibilities of those peoples to ensure the wellbeing of those lands, its inhabitants and their culture and traditions.

Consistent with our Values and *Human Rights Policy*, Gold Road is committed to caring for the wellbeing of all, acting with integrity, respecting human rights and developing sustainable exploration and mining operations. Gold Road seeks to create positive social impacts by promoting respect for human rights across our operations.

The purpose of this *Indigenous Peoples Policy* (**Policy**) is to define the principles and performance objectives of Gold Road in relation to Indigenous peoples affected by our operations.

2. SCOPE

This policy applies to all Gold Road employees and contractors. Gold Road's General Manager-Social Performance and External Relations and General Manager-Corporate Development and Legal have direct responsibility for the implementation of this Policy.

3. POLICY

3.1 Principles

Gold Road is committed to respecting human rights, as set out in our *Human Rights Policy*. Those rights include the rights of Indigenous peoples. Our approach to respecting the rights of Indigenous peoples that may be impacted by its operations is guided by the principle of 'free, prior and informed consent'.

Free, prior and informed consent is a concept recorded in the UN *Declaration on the Rights of Indigenous Peoples*. Gold Road interprets free, prior and informed consent in the following manner:

1. **Free** – means no coercion, intimidation, manipulation, or undue influence or pressure (including with reference to the relevant legislative framework);
2. **Prior** – means engaging with affected Indigenous peoples to understand their culture, traditions and customs and to ensure consent is sought sufficiently in advance of commencement of activities to provide adequate time for applicable Indigenous decision-making processes;
3. **Informed** – means the provision of information in relation to the nature, size, and scope of any proposed project or activity; and
4. **Consent** – means agreement to a project or activity after engaging in good faith negotiation with affected Indigenous peoples.

We will respect existing agreements entered into in good faith with Indigenous Peoples. The principle of free, prior and informed consent applies to new operations and major changes to existing projects that have the potential to impact on the rights of Indigenous peoples.

3.2 Impacts

Gold Road recognises that its operations have the potential to impact on the rights of Indigenous peoples in the following ways:

1. **Access to lands** – Our exploration and mining operations may require the temporary exclusion of, or imposition of restrictions on the activities of, Indigenous peoples from or on their traditional lands for the duration of those operations, including to ensure the safety of our employees and contractors and members of the relevant Indigenous peoples. Our mining operations may result in permanent transformation of landforms in a manner that excludes or restricts certain prior uses.
2. **Cultural heritage** – Our exploration and mining operations may impact on archaeological, historical, religious or cultural sites or artefacts of Indigenous peoples.
3. **Environment** – Our exploration and mining operations may impact on the environment and resources which Indigenous peoples have traditionally owned and used, including flora and fauna.
4. **Decision-making** – Our engagement with Indigenous peoples, including in relation to the impacts of its exploration and mining operations, will require engagement with, and may impact upon, representative institutions and participatory decision-making structures.

3.3 Performance objectives

We apply the following performance objectives to our operations:

1. **Access to lands** – We will access traditional lands with the consent of the Indigenous people.
2. **Cultural heritage** – We will avoid adverse impacts on the cultural heritage of Indigenous peoples. Where adverse impacts are unavoidable, we will seek to mitigate, minimise and manage those impacts.
3. **Environment** – We will seek to avoid adverse impacts on the environment of Indigenous peoples. Where adverse impacts are unavoidable, we will seek to mitigate, minimise and manage those impacts.
4. **Decision-making** – We will engage with Indigenous peoples through their representative institutions.

Gold Road will at all times ensure compliance with domestic laws in relation to access to lands, cultural heritage, environment and decision-making.

We will report against the performance objectives using the applicable metrics, including in its Sustainability Report.

3.4 Breaches

Suspected or actual breaches of this Policy, constitute 'Reportable Conduct' in accordance with Gold Road's *Community Management Standard* and *Whistleblower Policy* and may be reported in accordance with that standard by any person, including any member of any Indigenous peoples affected by our exploration and mining operations.

The Risk and ESG Committee will review the effectiveness of the *Indigenous Peoples Policy*.

This policy will be reviewed periodically to ensure it remains relevant to the needs of the Company and its stakeholders.

4. SUPPORTING, REFERENCE AND RELATED DOCUMENTS

4.1 Supporting Documents

- [Corporate Code of Conduct](#)
- [Community Management Standard](#)
- [Human Rights Policy](#)
- [Environmental Policy](#)
- [Whistleblower Policy](#)

4.2 References and Related Documents

- [OECD Guidelines for Multinational Enterprises](#), including [OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [UN Declaration on the Rights of Indigenous Peoples](#)
- [ILO Indigenous and Tribal Peoples Convention](#) (No. 169)
- [IFC Performance Standard 7](#)
- [Racial Discrimination Act 1975](#) (Cth)
- [Native Title Act 1993](#) (Cth)
- [Aboriginal and Torres Strait Islander Heritage Protection Act 1984](#) (Cth)
- [Environment Protection and Biodiversity Conservation Act 1999](#) (Cth)
- [Aboriginal Heritage Act 1972](#) (WA)
- [Environment Protection Act 1986](#) (WA)
- [Aboriginal Affairs Planning Authority 1972](#) (WA)
- [Cosmo Newberry Aboriginal Corporation By-laws](#)
- *Constitution of Yilka Talintji Aboriginal Corporation RNTBC*

5. DOCUMENT CONTROL

Version Number	Revision Date	Document Owner	Document Approver
Version 1.0	28 January 2022	General Manager – Social Performance & External Relations	Board of Directors