

1. PURPOSE

Gold Road Resources Limited (**Gold Road** or **the Company**) recognises Aboriginal and Torres Strait Islander peoples as the traditional owners of the lands on which it operates. We acknowledge the special and ongoing connection of these peoples to the lands and their custodial responsibilities to ensure the wellbeing of Country, its inhabitants, their lore, culture and traditions. We recognise and acknowledge Aboriginal and Torres Strait Islander peoples as the first peoples of Australia.

Consistent with Gold Road's Values, Human Rights Policy, Environmental Policy and Community Management Standard, 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 Aboriginal and Torres Strait Islander Peoples Policy (the **Policy**) is to define the principles and performance objectives of Gold Road in relation to Aboriginal and Torres Strait Islander 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 - Discovery, 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 Gold Road's Human Rights Policy. Our approach to respecting the rights of Aboriginal and Torres Strait Islander peoples that may be impacted by our 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 Aboriginal and Torres Strait Islander 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 Aboriginal and Torres Strait Islander 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 Aboriginal and Torres Strait Islander peoples.

We will respect existing agreements entered into in good faith with Aboriginal and Torres Strait Islander 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 Aboriginal and Torres Strait Islander peoples.

3.2 Impacts

Gold Road recognises that its operations have the potential to impact on the rights of Aboriginal and Torres Strait Islander 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, Aboriginal and Torres Strait Islander 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 Aboriginal and Torres Strait Islander peoples. Our mining operations may also 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 directly or indirectly on cultural landscapes, places and objects of archaeological and ethnographical significance to Aboriginal and Torres Strait Islander peoples.
3. **Environment** – Our exploration and mining operations may impact on the environment, water and resources which Aboriginal and Torres Strait Islander peoples have traditionally owned and used, including flora and fauna.
4. **Decision-making** – Our engagement with Aboriginal and Torres Strait Islander peoples, including in relation to the impacts of our 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 relevant Aboriginal and Torres Strait Islander people.
2. **Cultural heritage** – We will avoid adverse impacts on cultural heritage. 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 Aboriginal and Torres Strait Islander peoples. Where adverse impacts are unavoidable, we will seek to mitigate, minimise and manage those impacts.
4. **Decision-making** – We will engage with Aboriginal and Torres Strait Islander peoples through their representative institutions to ensure meaningful engagement with Aboriginal and Torres Strait Islander peoples when making decisions that impact them.

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

We will report against the performance objectives using the applicable metrics, including in our 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 Aboriginal and Torres Strait Islander peoples affected by our exploration and mining operations.

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 Cultural Heritage Act 2003](#) (QLD)
- [Aboriginal Affairs Planning Authority 1972](#) (WA)

5. POLICY REVIEW

This Policy is to be reviewed on a biennial basis by the General Manager – Social Performance and External Relations to ensure it remains relevant to the needs of the Company and its stakeholders. In consultation with the Managing Director and CEO, and presented to the Risk & ESG Committee for review and recommendation to the Board.

6. DOCUMENT CONTROL

Version Number	Revision Date	Document Owner	Document Approver
Version 2.0	10 June 2024	General Manager – Social Performance & External Relations	Board of Directors