



# BELLEVUE GOLD

## Sustainability Policy

### 1. INTRODUCTION

Bellevue Gold Limited (**Company**) recognises that embracing the concept of shared value for our key stakeholders is paramount for any sustainable organisation. The Company commits to operate the business in line with the core principles of sustainable development, to deliver on meeting the needs of the present, without compromising the ability of future generations to meet their own needs, and integrating environmental, social and governance (**ESG**) considerations into all aspects of the Company's decision making.

### 2. ENVIRONMENT

The Company has an Environmental Policy. The Company recognises that protection of the environment entails the following:

- the precautionary principle;
- the principle of intergenerational equity;
- the principle of the conservation of biological diversity and ecological integrity;
- principles relating to improved valuation, pricing and incentive mechanisms; and
- the principle of waste minimisation.

#### 2.1 Closure and ecosystem services

The Company will consult with relevant stakeholders to ensure to the extent reasonably possible that current and future generations inherit a positive legacy, whereby the post mine land use delivers a sustainable environmental value. The Company is and will continue to be proactive in taking into account the effect of changed climatic conditions. The Company will be responsible stewards and restore ecological values and leave a safe and stable landform.

## **2.2 Biodiversity and rehabilitation**

The Company commits not to mine or explore in UNESCO World Heritage Sites, Ramsar Wetlands, sites that fit the designation criteria of the Alliance for Zero Extinction and IUCN Category I-IV protected areas (which may include key biodiversity areas). The Company will actively maintain key biodiversity values by following the mitigation hierarchy to first avoid, minimise, rehabilitate, and potentially compensate for residual damage, where appropriate, such as through biodiversity offsets and other Additional Conservation Actions.

## **2.3 Circular economy and waste**

The Company commits to sustainable consumption and production. The Company commits to managing waste and hazardous substances responsibly throughout storage, handling, use and disposal.

## **2.4 Water**

The Company will actively manage water as a precious resource through every stage of the mine life. Water is a multifaceted feature, where the Company is cognizant of our withdrawal, discharge and water quality. The Company strives to have a strong stewardship approach to water, with minimal use of freshwater and to maximise use of hypersaline water that is an unusable resource in the area and the Company aims to not materially affect any municipal, agriculture or Traditional Owners requirements for water.

## **2.5 Air, soil and water pollutants**

The Company will manage pollutants within safe and legal limits and aims to remove workers from exposure through effective work design. The Company commits to taking appropriate steps to manage the pollutants and greenhouse gas emissions associated with its activities.

## **2.6 Climate change**

The Company has issued a Climate Change Policy, which further details the Company's approach to climate change.

The Company agrees with the intent of the Paris Agreement, under the United Nations Framework Convention on Climate Change, to limit the increase in the global average temperature to well below 2°C, and ideally limited to 1.5°C above pre-industrial levels. The Company believes that a comprehensive international approach, with the support of government, industry and civil society, can result in significant decarbonisation and an avoidance of the most significant impacts of climate change. The Company acknowledges the role that companies can play towards the international goal of reducing emissions. The Company will identify, avoid, reduce and, if required, offset emissions in order to achieve a low emission gold mine operation. The Company will facilitate appropriate governance, disclosure and engagement on climate-related matters. The Company takes responsibility for its environmental impact seriously, including its greenhouse gas emissions.

The Company is working towards alignment to the recommendations made through the Task Force on Climate-Related Financial Disclosures, including on the pillars of governance, strategy, risk management, metrics and targets.

## **3. SOCIAL**

### **3.1 Health and safety**

The Company commits to providing a healthy and safe environment and will promote a culture of consultation, collaboration and communication to prevent workplace accidents, injuries, illness and to support positive mental health and well-being.

The Company commits to instilling a culture of safety leadership and risk awareness through maintaining standards, relevant procedures and engaged in-field interactions and observations. Safety leadership is encouraged at all levels, demonstrated through actions, accountability and commitment to the health, safety, and welfare of our people.

The Company intent is to drive innovation and the continuous improvements necessary to integrate effective risk management and avoid any incidents that have the potential to harm workers or the community and comply with relevant legal obligations.

The Company has issued a Health and Safety Policy, which further details the Company's approach to health and safety.

### **3.2 Labour rights**

The Company's approach in relation to labour rights are described in the Company's Human Rights Policy, by which the Company acknowledges and respects the right to work and to favourable conditions of work, prohibition of slavery and forced labour, prohibition of child labour and equal labour rights of migrant workers.

The Company supports the principles outlined in the International Labour Organisation (**ILO**) Declaration on Fundamental Principles and Rights at Work and other ILO core conventions. The Company supports the right to collective bargaining and seeks to develop respectful relationships with employees. The Company's Code of Conduct outlines its requirements that employees must not harass, discriminate, or support others who harass and discriminate against colleagues or members of the public on the grounds of sex, pregnancy, marital status, age, race (including their colour, nationality, descent, ethnic or religious background), physical or intellectual impairment, sexuality or gender identity. The Company commits to training its employees so that they have up-to-date skills, even in the face of changing technology.

The Company is committed to workplace diversity and inclusion at all levels of the Company and to creating a working environment that values the contribution of all its employees. It is the intention of the Company that all matters related to employment, recruitment practices and career progression are free from discrimination regardless of gender, marital or family status, sexual orientation, gender identity, age, disabilities, ethnicity, religious beliefs, cultural background, socio-economic background, perspective and experience.

The Company recognises the benefits arising from employee and Board diversity, including a broader pool of high quality employees, improving employee retention, accessing different perspectives and ideas and benefiting from all available talent. In order to have an inclusive workplace the Company does not tolerate discrimination, harassment, vilification and victimisation and will ensure ethical practices throughout the recruitment process and full employment cycle. Diversity includes, but is not limited to, matters of gender, age, ethnicity and cultural background. The Company has issued an Equal Employment Opportunity and Diversity

Policy, which further details the Company's approach to diversity and inclusion and reflects the Company's Statement of Values.

### **3.3 First Nations people**

In line with the United Nations Declaration on the Rights of Indigenous Peoples the Company will seek to obtain Free, Prior and Informed Consent through its agreement-making processes. The Company seeks to build sustainable, long-term and mutually beneficial outcomes with communities that are impacted by its operations and to understand, respect and ensure the needs, rights and cultures are recognised and addressed. The Company has issued an internal-only Indigenous Employment Policy and a Contractor Indigenous Employment Policy which are designed to assist with the hiring of Indigenous employees and contractors.

The Company has entered into a Native Title Agreement (**NTA**) with the Tjiwarl Aboriginal Corporation RNTBC (**Tjiwarl AC**) as the holder on trust for the Tjiwarl Native Title Holders, (being the Native Title rights and interest holders and Traditional Owners of the land) which hosts the Bellevue Gold Project. The NTA includes a co-designed Cultural Heritage Management Plan. The NTA follows many beneficial discussions between Tjiwarl AC and Bellevue Gold, resulting in the formalisation of an agreement that embodies a spirit of genuine collaboration and respect, facilitating project development while protecting heritage and country and providing opportunities for Tjiwarl people.

### **3.4 Human rights**

The Company's approach in relation to human rights is described in the Company's Human Rights Policy.

The Company recognises the inherent, equal and inalienable rights of all people to freedom, justice and peace. The Company seeks to continually improve its processes and practices to protect human rights and, ultimately, eliminate modern slavery within our operations and supply chains. The Company is committed to seeking to identify, reduce and ultimately prevent abuses of human rights (including modern slavery) from occurring in our operations and supply chain. The Company is committed to implementing policies and procedures that meet our legal and ethical obligations.

The Company supports the [1948 Universal Declaration of Human Rights](#), and the [UN Global Compact](#) relating to human rights.

## **4. GOVERNANCE**

### **4.1 Tax transparency**

The Company commits to timely and fair payment of taxes and royalties. The Company will transparently report its total contribution in the interest of accountability to society and civil institutions. The Company is committed to compliance with the spirit as well as the letter of tax laws, committed to not transfer value created to low tax jurisdictions and to not use secrecy, jurisdictions, or tax havens for tax avoidance.

## **4.2 Anti-bribery and anti-corruption practices**

The Company has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings. For further details, refer to the Company's Anti-Bribery and Anti-Corruption Policy.

## **4.3 Privacy**

The Company endeavours to keep our information systems and files secured from unauthorised access. The Company holds Personal Information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers. The Company maintains appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of Personal Information. This also applies to disposal of Personal Information.

The Company further protects Personal Information by restricting access to Personal Information to only those who need access to the Personal Information to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your Personal Information. The Company will destroy or de-identify Personal Information once it is no longer needed for a valid purpose or required to be kept by law. For further details, refer to the Company's Privacy Policy or contact the Company's Privacy Officer.

## **4.4 Whistleblowing**

The Company is committed to creating and maintaining a culture of integrity and fair and honest dealing in its business activities. The Company encourages the reporting of any instances of suspected unethical, illegal, fraudulent, unacceptable or undesirable conduct involving the Company and provides protections and measures so that those persons who make a Disclosure may do so confidentially and without fear of intimidation or reprisal. The Company's priority is to support and protect people who raise concerns that are reportable. For further details, refer to the Company's Whistleblower Policy or contact the Company's Whistleblower Protection Officer.

## **4.5 Board of Directors**

The Company will take steps to ensure that the majority of its Board of Directors are independent. The Company assesses independence against the criteria set out in the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations* (as amended from time to time).

As detailed on the Company's website and in the Annual Reports, and Corporate Governance Statement the Company's directors are all professionals with a wealth of experience across a range of areas considered relevant to the Company's business. The Company is committed to ensuring the Board is comprised of directors who possess the appropriate mix of skills, expertise and diversity to adequately discharge its responsibilities and duties. For further details, refer to the Board Charter and committee charters (including the Audit & Risk Management Committee Charter, Health, Safety and Sustainability Committee Charter and the Nomination and Remuneration Committee Charter).

## **5. REPORTING**

The Company reports sustainability matters through its Sustainability Report. The company is currently aligning itself to the Task Force on Climate-Related Financial Disclosures recommendations, and aligns reporting to other frameworks, such as the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (as amended from time to time), the Sustainability Accounting Standards Board's Metals and Mining Sustainability Accounting Standard, the Global Reporting Initiative standards and the United Nations Sustainable Development Goals.

## **6. TRAINING**

Training and awareness of the Sustainability Policy may be delivered to key staff and, if deemed appropriate, to key partners and suppliers.

## **7. RESPONSIBILITIES**

The Health, Safety and Sustainability Committee is charged with the oversight of the Company's sustainability practices. Within the management team, the Chief Sustainability Officer is responsible for sustainability practices. If an individual is in any doubt regarding sustainability matters, they should contact the Chief Sustainability Officer.

## **8. REVIEW**

This policy will be reviewed by the Board annually, to ensure that it continues to reflect the intent and aspirations of the Company in addressing sustainability, including ESG matters.

## **9. ASSOCIATED DOCUMENTS**

Anti-Bribery and Anti-Corruption Policy

Audit & Risk Management Committee Charter

Board Charter

Climate Change Policy

Code of Conduct

Corporate Governance Statement

Environmental Policy

Equal Employment Opportunity & Diversity Policy

Health, Safety and Sustainability Committee Charter

Health and Safety Policy

Human Rights Policy

Nomination and Remuneration Committee Charter

Privacy Policy

Whistleblower Policy

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Social	3.1) Health and safety	Health and Safety Policy
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Governance	4.1) Tax transparency	
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	4.5) Board of Directors	Board Charter



## Review History

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