



# BELLEVUE

## GOLD

### Sustainability Policy

#### 1. INTRODUCTION

Bellevue recognises that embracing the concept of shared value for our key stakeholders is paramount for any sustainable organisation. Bellevue 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 considerations into all aspects of Bellevue's decision making.

#### 2. ENVIRONMENT

Bellevue has an Environmental Policy. Bellevue 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

Bellevue 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. Bellevue is and will continue to be proactive in taking into account the effect of changed climatic conditions. Bellevue will be responsible stewards and restore ecological values and leave a safe and stable landform.

## **2.2 Biodiversity and rehabilitation**

Bellevue 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). Bellevue 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**

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

## **2.4 Water**

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

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

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

## **2.6 Climate change**

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

Bellevue 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. Bellevue 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. Bellevue acknowledges the role that companies can play towards the international goal of reducing emissions. Bellevue will identify, avoid, reduce and, if required, offset emissions in order to achieve a low emission gold mine operation. Bellevue will facilitate appropriate governance, disclosure and engagement on climate-related matters. Bellevue takes responsibility for its environmental impact seriously, including its greenhouse gas emissions.

### **3. BELLEVUE IS WORKING TOWARDS REPORTING IN ALIGNMENT WITH THE AUSTRALIAN SUSTAINABILITY REPORTING STANDARDS (ASRS). SOCIAL**

#### **3.1 Health and safety**

Bellevue 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.

Bellevue 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.

Bellevue 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.

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

#### **3.2 Labour rights**

Bellevue's approach in relation to labour rights are described in Bellevue's Human Rights Policy, by which Bellevue 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.

Bellevue supports the principles outlined in the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and other ILO core conventions. Bellevue supports the right to collective bargaining and seeks to develop respectful relationships with employees. Bellevue'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. Bellevue commits to training its employees so that they have up-to-date skills, even in the face of changing technology.

Bellevue is committed to workplace diversity and inclusion at all levels of Bellevue and to creating a working environment that values the contribution of all its employees. It is the intention of Bellevue 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.

Bellevue 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 Bellevue 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 Bellevue has issued an Equal Employment Opportunity and Diversity Policy, which further details Bellevue's approach to diversity and inclusion and reflects Bellevue's values.

### **3.3 First Nations people**

In line with the United Nations Declaration on the Rights of Indigenous Peoples, Bellevue will seek to obtain Free, Prior and Informed Consent through its agreement-making processes. Bellevue 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. Bellevue 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.

Bellevue 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**

Bellevue's approach in relation to human rights is described in Bellevue's Human Rights Policy.

Bellevue recognises the inherent, equal and inalienable rights of all people to freedom, justice and peace. Bellevue seeks to continually improve its processes and practices to protect human rights and, ultimately, eliminate modern slavery within our operations and supply chains. Bellevue 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. Bellevue is committed to implementing policies and procedures that meet our legal and ethical obligations.

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

## **4. GOVERNANCE**

### **4.1 Tax transparency**

Bellevue commits to timely and fair payment of taxes and royalties. Bellevue will transparently report its total contribution in the interest of accountability to society and civil institutions. Bellevue 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**

Bellevue 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 Bellevue's Anti-Bribery and Anti-Corruption Policy.

## **4.3 Privacy**

Bellevue endeavours to keep our information systems and files secured from unauthorised access. Bellevue 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. Bellevue 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.

Bellevue 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. Bellevue 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 Bellevue's Privacy Policy or contact Bellevue's Privacy Officer.

## **4.4 Whistleblowing**

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

## **4.5 Board of Directors**

Bellevue will take steps to ensure that the majority of its Board are independent. Bellevue 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 Bellevue's website and in the Annual Reports, and Corporate Governance Statement, the Directors are all professionals with a wealth of experience across a range of areas considered relevant to Bellevue's business. Bellevue 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**

Bellevue reports sustainability matters through its Sustainability Report. Bellevue is currently aligning itself to the Task Force on Climate-Related Financial Disclosures recommendations (but

will transition to reporting in alignment with the Australian Sustainability Reporting Standards (ASRS)), 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 Bellevue's sustainability practices. Within the management team, the Chief Operating Officer is responsible for sustainability practices. If an individual is in any doubt regarding sustainability matters, they should contact the Chief Operating Officer.

## 8. REVIEW

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

## 9. DEFINITIONS

In this Policy:

**Bellevue** means BGL and its wholly owned subsidiaries.

**BGL or Company** means Bellevue Gold Limited.

**Board** means the board of directors of the Company.

**Director** means a director of the Company.

**Policy** means this Sustainability Policy.

## 10. 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

**Table 1:** Index of Company policies, relating to sustainability.

<b>Element</b>	<b>Topic</b>	<b>Reference policies</b>
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	2.2) Biodiversity and rehabilitation	
	2.3) Water	
	2.4) Circular economy and waste	
	2.5) Climate change	Climate Change Policy
Social	3.1) Health and safety	Health and Safety Policy
	3.2) Labour rights	Code of Conduct and Human Rights Policy
	3.3) Diversity and inclusion	Equal Employment Opportunity & Diversity Policy
	3.4) First Nations people	Indigenous Employment Policy and Social Cultural Heritage Management Plan
	3.5) Human rights	Human Rights Policy
Governance	4.1) Tax transparency	
	4.2) Anti-bribery and anti-corruption practices	Anti-Bribery and Anti-Corruption Policy
	4.3) Privacy	Privacy Policy
	4.4) Whistleblowing	Whistleblower Policy
	4.5) Board of Directors	Board Charter

## Review History

<b>Doc number:</b>	BGL-CGP-POL-017
<b>Doc owner:</b>	Chief Operating Officer
<b>Approved by:</b>	Board
<b>Last Review Date:</b>	19 November 2025