

## 1. Purpose

The purpose of this Sexual Harassment Policy (**Policy**) is to confirm Resolute Mining Limited, subsidiaries and related entities, (**Resolute**)'s commitment to maintaining a safe, inclusive and respectful organisational culture that is free from all types of harassment, bullying and discrimination and, in particular, free of any and all forms of sexual harassment.

This document also outlines Resolute's procedure for managing sexual harassment in the workplace by:

- communicating Resolute's commitment to maintaining a workplace that takes a 'zero tolerance' approach to sexual harassment;
- enabling reporting of sexual harassment by providing safe, confidential, well-defined and accessible means for reporting unacceptable behaviour; and
- promptly investigating and resolving all allegations of sexual harassment in the workplace in a sensitive, respectful and appropriate manner.

## 2. Scope

This Policy applies to all employees of Resolute and its subsidiary companies and any contractors, consultants, volunteers, agency workers and vacation students managed by the Company (hereafter collectively referred to as staff. This Policy also seeks to protect from sexual harassment all applicants and job-seekers who may be considered for employment with Resolute. Aspects of this Policy may need to be applied in different ways to cater for those who are not employees of Resolute.

All of Resolute's corporate offices, mine sites and projects operating in any country are covered by this Policy. All staff are expected to adhere to the standards set out in this Policy. Staff should note that they may also be subject to anti-harassment and anti-discrimination legislation that applies in overseas jurisdictions in which the Company operates (such as Mali and Senegal).

This policy is not part of any contract of employment and does not create contractual rights or obligations. It will be reviewed periodically and may be amended by us at any time.

## 3. Definitions

### What is workplace sexual harassment?

Though legal definitions of sexual harassment may vary between jurisdictions, sexual harassment can be generally described as any unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, in circumstances where a reasonable person, having regard to all the circumstances, would anticipate the possibility that the person harassed would be offended, humiliated or intimidated.

Sexual harassment can take many forms and may include physical contact (such as "groping" or massaging), verbal comments (including sexualized comments about physical appearance or questions or comments about a person's sexual activities), requests for sex or invitations to go on dates, sexual jokes, sexual propositions, the display of pornographic or offensive material (including on smart phones, through social media or via text messages) or any other behaviour which creates a sexually hostile environment. It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature in the past.

Conduct may amount to sexual harassment even if it is unintended and the person doing it is unaware that they might cause offence. Conduct does not need to be sexually motivated in order to be sexual in nature and can be from someone of the same or a different sex.

Sexual harassment is not always obvious, repeated or continuous. Unlike bullying, which is usually characterised by repeated behaviour, sexual harassment can be a one-off incident.

Sexual harassment can also be a behaviour that while not directed at a particular person, affects someone who is exposed to it or witnesses it (such as overhearing a conversation or seeing sexually explicit posters in the workplace).

Sexual harassment is unlawful, and may also amount to a criminal offence, in which case it will be referred to the police. In addition, staff may be held personally liable for sexual harassment.

Sexual conduct that has been welcomed in the past can become unwanted, and it is not necessary for an individual to expressly object for behaviour to be unwanted.

For the avoidance of doubt, being under the influence of alcohol or other intoxicating substances is not a defence or mitigation to allegations of sexual harassment.

## What is considered to be a 'workplace'?

A '**workplace**' means a place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work.

This means sexual harassment can happen:

- at a worker's usual workplace;
- where a worker is working remotely, including if the person's workplace is their home;
- in a place where the worker is undertaking work at a different location (such as a client's home);
- where the worker is engaging in a work-related activity such as conferences, training, work trips, work-related corporate events or a work-related social activity like a Christmas party, or
- by phone, email or online (such as through social media platforms).

Sexual harassment may be perpetrated by various people including an employer, supervisor, co-worker, client or customer.

## 4. Third parties

We do not tolerate sexual harassment against our staff by third parties, including but not limited to our suppliers, clients and commercial partners. Third party sexual harassment can result in legal liability and, if you experience sexual harassment by a third party while at or in connection with your work, you should follow the reporting procedure outlined in this policy. Resolute will promptly investigate any complaints in line with this policy and ensure that we take appropriate action to remedy any upheld complaint and prevent it from happening again.

## 5. Business Conduct

Sexual harassment, discrimination and victimisation, in all its various forms, is an affront to workplace safety, diversity, equity and inclusion. Any related behaviour exhibited in the workplace, at a work event, while working remotely or while travelling for business purposes, is unacceptable, will not be tolerated and will be treated as a serious disciplinary matter, with possible disciplinary action up to and including termination of employment. Resolute requires all staff to always behave in a manner consistent with Resolute's values (and other applicable policies and regulations).

Code of Conduct and other training is provided to all employees on commencement with Resolute to promote safety, diversity and inclusion and to eliminate all forms of sexual harassment, discrimination and victimisation in the workplace. Annual refresher training is run for all employees to reinforce these behavioural expectations.

## 6. Responsibilities

The Board via the Sustainability Committee is responsible for overseeing the implementation of this Policy and all associated initiatives.

The Chief Executive Officer (**CEO**) is responsible for establishing a safe and respectful organisational culture where all staff are treated equally and all forms of sexual harassment, discrimination and victimisation are absent / removed.

The CEO and their direct reports (**Executive Committee**) are responsible for overseeing the implementation of the initiatives outlined in this Policy and providing regular feedback to the Board via the Sustainability Committee.

## 7. Procedure

### 7.1 Resolution of Issues Procedure

The Company's procedure for dealing with matters relating to sexual harassment is intended to maximise the possibility of timely and confidential resolution.

#### Raising concerns (self-management)

Issues can often be resolved by speaking to the person who is the cause of the complaint and advising them of the concerns, but only if you feel safe and confident to do so.

The behaviour that is unacceptable should be communicated and a very clear statement should be made that the behaviour should not be repeated. Informing the person will give them a chance to stop or change what they are doing.

If you decide to take this route, it is a good idea to keep notes or a diary of any incidents of harassment or victimisation and the attempts made to resolve matters because, if this informal action does not resolve matters, these notes may help us to investigate, if you wish to take further action.

#### Raising concerns (to others)

If you do not feel comfortable approaching the person involved directly, you should raise your concern with:

- your immediate supervisor and or manager;
- a specifically trained contact person for your site, if a contact person has been appointed;
- a People/Human Resources team representative; or
- make a confidential complaint using the Company's FairCall 24/7 reporting hotline as follows:
  - Australia – 1800 500 965
  - Senegal – +61 2 9335 8785
  - Mali – +223 21 66 0510
  - UK – + 61 2 9335 8785

That person will provide confidential support and will work with you on an appropriate way to resolve the matter. This may then lead to:

- you feeling comfortable to directly approach the person involved;
- the supervisor/manager, the contact officer, or People Team representative, privately conveying your concerns to the person complained against and reiterating the Company's behaviour expectations, without assessing the merits of the case or necessarily obtaining an admission from the person; or
  - a decision that a formal investigation needs to be conducted.

If you try to resolve matters informally, we understand that you may not wish us to take any action. However, we still encourage all concerns to be reported to us. Although we would normally seek to respect your wishes not to take further action, if we believe that the welfare, health or safety of others may be at risk or for other overriding reasons, it may be necessary for us to investigate matters further.

There is no obligation to try to resolve matters informally. You may also ask us to formally look into a matter if you've tried to resolve something informally and this hasn't been successful.

## **Formal Process**

In some cases, it will be necessary for Resolute to initiate a formal process to ensure that the complaint is fully investigated. You may also initiate the formal process. This will usually involve Resolute undertaking the following steps on a confidential basis:

- obtaining a written statement of allegations from you by completing the Employee Formal Complaint Form;
- investigating the allegations, including informing the person in writing of the complaint made against them;
- giving the employee an opportunity to respond to the allegations raised against them;
- considering the substantiated facts of the investigation and making a finding as to whether the conduct occurred;
- submitting a report with a recommended course of action to the appropriate decision maker (senior management); and
- implementing an appropriate outcome.

At the conclusion of any investigation, we will confirm the outcome of the investigation. If the investigation reveals that sexual harassment or victimisation has taken place, we will decide on what action should be taken against the perpetrator, which may include action under our Disciplinary and Dismissal Policy. If you're not satisfied with the outcome of your complaint, you can appeal in accordance with the procedure set out in our Global Grievance Policy

In appropriate circumstances the company may, in its sole discretion, appoint an external investigator to complete the investigation, although this task will usually be undertaken by a senior Human Resources representative.

## **Reporting Harassment Against Others**

If you observe inappropriate or unacceptable behaviour directed toward another employee, you have a responsibility to raise their concern with:

- the employee exhibiting the inappropriate / unacceptable behaviour
- their supervisor/manager;
- a representative from the People/Human Resources Team; or
- Resolute's Disclosure Protection Officer (refer to Whistleblower Policy).

If a supervisor or manager receives a complaint or observes unacceptable conduct, they must take independent action in accordance with section 7.1 irrespective of whether a complaint has been made.

## **What Happens if I am Accused of Sexual Harassment?**

If someone approaches you informally about your behaviour, do not dismiss the complaint out of hand (for example because you were only joking or think the complainant is being too sensitive). Remember that different people find different things acceptable and everyone has the right to decide what behaviour is acceptable to them and to have

their feelings respected by others. You may have offended someone without intending to. If that is the case, the person concerned may be content with an explanation and an apology from you and an assurance that you will be careful in the future not to behave in a way that you now know may cause offence. Provided that you do not repeat the behaviour that has caused offence that may well be the end of the matter.

If a formal complaint is made about your behaviour, this will be fully investigated before any decision is made. If the complaint against you is upheld, the Company may initiate disciplinary proceedings. The Company will follow its Disciplinary Policy and you will have the rights set out in that policy. Please be aware that sexual harassment or victimisation may constitute gross misconduct, which could lead to dismissal without notice.

If appropriate, the Company will try to ensure that you and the complainant are not required to work together while the complaint is under investigation. If we feel it is appropriate for you to do so, we may suspend you on full pay during the investigation and any subsequent disciplinary proceedings (if a disciplinary hearing is held).

If the complaint against you is upheld, a disciplinary penalty may be imposed up to and including dismissal without notice, having regard to the seriousness of the offence and all relevant circumstances. The Company will take into account any aggravating factors, such as abuse of power over a more junior colleague, when deciding the appropriate disciplinary action to take. If the complaint is upheld, but you are not dismissed, the Company may decide to transfer you to another post.

If the complaint against you is not upheld, the Human Resources team will support you, the complainant and your manager(s) in making arrangements for you and the complainant to continue or resume working together and to help to repair your working relationship if necessary.

### **Speaking to the police**

There can be an overlap between behaviour that constitutes sexual harassment and criminal offences, including sexual assault, indecent exposure, stalking and offensive communication. Nothing in this policy should prevent you from contacting the police, if you consider that appropriate. In certain circumstances we may advise you to report a matter to the police. In such circumstances we will help you to liaise with the police and give you support throughout the process.

## **7.2 Other Considerations**

### **Protections against Retaliation**

It is our policy that no one will be retaliated against for making a complaint of sexual harassment, or for cooperating in the investigation of a complaint, in good faith. Any acts of retaliation will be considered a violation of this policy, and will be treated as a serious disciplinary issue.

### **False Accusations**

Although all allegations of sexual harassment will be treated seriously and confidentially, disciplinary action may be taken where a person makes a claim which is subsequently proven to be knowingly false or vexatious in nature.

### **Natural Justice**

All investigations of sexual harassment will adhere to the principles of natural justice, also known as procedural fairness, on all occasions.

## **8. Employee Assistance**

Employees who believe they have been subject to or have observed inappropriate / unacceptable behaviour at work are encouraged to seek confidential support via the Employee Assistance Program (EAP). EAP assistance can be contacted 24 hours a day at:

- from Australia - 1800 273 865; or
- from overseas - +61 3960 02955

## 9. Rights and Responsibilities

### 9.1 Employee

**The Company's Employees have the following rights and responsibilities:**

#### **Rights**

- A workplace free from sexual harassment, discrimination and bullying.
- Any complaints taken seriously and treated impartially, in a prompt and confidential manner.
- Protection against victimisation and reprisals.
- Entitlement to make a complaint knowing that such action will not, in any way, affect their current employment status and future career prospects or general standing in the workplace.

#### **Responsibilities**

- To undertake all required training.
- Comply with the Company's policies and procedures to achieve an effective resolution.
- Raise concerns about alleged harassment or bullying at the earliest possible time in order to maximise the likelihood of an effective resolution.
- Maintain complete confidentiality concerning any complaint or investigation.
- Respect and abide by the decision and outcomes of an investigation.

### 9.2 Manager

**Managers have the following additional responsibilities:**

- Ensure that employees are aware of the Company's policies, standards and procedures and the appropriate conduct requirements.
- Role model good conduct at all times.
- Constantly monitor the work environment to ensure acceptable standards of conduct.
- Respond to all claims of harassment, bullying or discrimination in a timely, supportive, objective and confidential manner.
- Raise any concerns of inappropriate behaviour directly and take appropriate action.
- Keep written records of all reports, complaints and actions taken, even in the absence of a formal complaint.
- Liaise with their Manager once removed or a representative from the People Team regarding all concerns of inappropriate behaviour.
- Liaise with their Manager and or a representative from the People Team to conduct a Workplace Conduct Investigation if it is required.

### 9.3 People Team

**Employees within the People Team have the following responsibilities:**

- Ensure that all staff have access to the Company's policies, standards and procedures.
- Ensure all staff undertake appropriate training in relation to the Company's policies, standards and

procedures.

- Identify and train workplace contact officers where appropriate.
- Adhere to Company policy to ensure that all staff have equal opportunity in the workplace.
- Support the complainant and any supervisor/manager through the complaint procedure.
- Offer informal and formal resolution options.
- Address complaints in a manner which is fair, timely and confidential.
- Fully document all complaints and ensuing investigations.
- Facilitate Workplace Conduct Investigations and any outcomes as required.
- Engage an external consultant to conduct an investigation if it is warranted.
- Ensure procedural fairness and natural justice and confidentiality are applied to all complaints.
- Advise if further training, coaching or counselling is requested or deemed appropriate.

## 10. Related documents

- Internal documents:
  - Code of Conduct
  - Equal Employment Opportunity
  - Diversity & Inclusion Policy
  - Employee Formal Complaint Form (PAC-ADM-FRM-0007)

This Policy reflects the requirements of applicable anti-discrimination legislation in relation to our workplaces. The rights and responsibilities set out in this Policy ensure compliance with all the relevant legislative standards.

## 11. Approval and Review

This document is to be reviewed annually by the Sustainability Committee of the Board.

Version	RIGS Document Category	Date	Status	RIGS Document Owner	Reviewer	Approver	Approval Date
1.0	Board	25 October 2021	Reviewed	<b>Jordan Morrissey</b> <i>EGM - Sustainability</i>	<b>Stuart Gale</b> <i>Managing Director and CEO</i>	<b>Martin Botha</b> <i>Chair</i>	28 October 2021
2.0	Board	23 December 2025	Reviewed	<b>Jackie Kennedy</b> <i>Head of People</i>	<b>Chris Eger</b> <i>Managing Director and CEO</i>	<b>Andrew Wray</b> <i>Chair</i>	31 December 2025