



Modern Slavery Statement

Norton Gold Fields Pty Ltd
FY2025

This is a joint modern slavery statement covering the activities of Norton Gold Fields Pty Ltd (ACN 112 287 797), Paddington Gold Pty Limited (ACN 008 585 886), which are both reporting entities, and their owned and controlled entities (collectively, the **Norton Group**) during the year ended 31 December 2025.

This sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains. It also includes an assessment of the Norton Group's activities against the UN Guiding Principles on Business and Human Rights (**UNGP**).

This statement has been approved by the board of Norton Gold Fields Pty Ltd and Paddington Gold Pty Limited on 22 June 2026.

About us

At the Norton Group, we recognise that respecting the human rights of those affected by our business activities is important. We are committed to 'Zero Harm' and continuous improvement initiatives by striving to work to the highest ethical and safety standards to minimise potential harm to people, the environment and the communities in which we operate.

Our structure

Norton Gold Fields Pty Ltd is a company incorporated in Australia and our registered office is located in Kalgoorlie, Western Australia.

Norton Gold Fields Pty Ltd is a subsidiary of Zijin Mining Group Co. Ltd (**Zijin**), headquartered in China. Zijin and its subsidiaries have mining operations in countries throughout the world. While the Norton Group entities are a subsidiary of Zijin, the Norton Group entities have their own corporate policies.

Norton Gold Fields Pty Ltd has a number of owned and controlled Australian entities, including Paddington Gold Pty Ltd. Paddington Gold Pty Limited is also incorporated in Australia with operations in Kalgoorlie.

Our operations

The Norton Group is one of Australia's largest domestic gold producers with mining and processing complexes located in Western Australia's Kalgoorlie gold region. Our key operations are through two main centres, the Paddington Operations Centre and the Binduli Operations Centre, which oversee six surrounding mining regions with mining and exploration tenement package covering an area of approximately 921km² within the world-class Kalgoorlie gold province. The Paddington Operations are centered around the Paddington Mill, which is located 35km North-West of Kalgoorlie, Western Australia. The Binduli Operations are centered around the Binduli North Heap Leach Project, which is located 10 km west of Kalgoorlie, Western Australia. Within these areas, we engage in exploration, mining and the processing of gold ore, which is then transported for refining.

The Norton Group has operated exclusively in Western Australia throughout FY2025 and has continued to expand its operations in Western Australia through the progression of a series of low grade expansion projects, including delivering a fine screening project through to commissioning at Binduli to enable improved overall recovery. A Binduli Great Eastern Highway underpass project was initiated and progressed to connect Binduli South and North operations, enhancing site integration and logistics efficiency. The Paddington Mill also underwent expansion and upgrading to further enhance its processing capacity and metal recovery rate. This has continued to increase the Norton Group's gold

production profile.

The Norton Group is also committed to reducing carbon emissions and continued to invest in and progress green energy projects. Phase two of the Binduli hybrid power project was completed, which includes solar generation, battery storage and diesel backup. Stage 2 Solar-BESS construction was advanced to reduce diesel consumption and lower operating costs across Binduli operations. Project approval was also initiated and future access to mineral deposits was blocked for the solar PV farm footprint at the Paddington Mill, de-risking the site for development to support ongoing upgrades to gold processing operations.

We engage approximately 862 employees within the Norton Group. Our employees are residentially based in Perth or between Kalgoorlie and nearby Coolgardie. We also engage a number of contractors where required and expect our contractor engagement will continue to increase in future years as we expand our operations.

Our supply chain

An annual spend of \$250,000 was exceeded for 293 out of a total of over 1700 suppliers, which represented over 94% of the Norton Group's total annual expenditure. Our suppliers are primarily located in Australia and we also sourced services from a comparatively small number (38) of key suppliers based overseas in China, Taiwan, Singapore, US, Canada, UK and Finland. We recognise that more than 50% of our supplies by value (including from Australian suppliers) are sourced from overseas locations.

Across our total supply chain, the Norton Group's key expenditure is in the following areas:

- consumables (including fuel, lubricants, explosives and other specialty hydrocarbon products);
- mining equipment (crushers, grinding mills and drilling equipment);
- mining services (haulage and earthmoving, drilling & blasting, surveying and exploration); and
- logistics services.

Modern slavery risks

The Norton Group considers the risks of modern slavery in our supply chain and operations to be low. In arriving at that view, senior management have had general regard to the Norton Group's risk assessment framework and have carefully considered the scope, nature and key features of operations against generally accepted risk characteristics, rather formally applying specific risk rating criteria. The conclusion of a low risk rests, in particular and in light of the general principles and approach of our risk assessment framework, on features such as our continuing focus on operations in Australia, the established ongoing relationships we have with trusted reputable suppliers and the absence of any significant red flags for a heightened risk of modern slavery across our global supply chain and operations. We nevertheless recognise that modern slavery may impact our business activities and we endeavour to take responsibility for continuous improvement and transparency in reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment

The Norton Group's supply chains and operations in FY2025 remained very similar to our FY2024 profile. As noted above, the Norton Group senior management assessed the level of risk against our existing risk assessment framework and identified that there generally remained a low to medium potential for modern slavery risks, given that these suppliers and their operations have remained largely the same.

To identify potential material risks in our supply chain and operations, the Norton Group has assessed our supply chain and operations for modern slavery risks against a number of modern slavery risk identifiers and red flags. These include the sector and industry, the type of products and services, geographical location and specific entity risk. Our most important suppliers have been individually reviewed and broadly assessed as being either high / medium / low risk. These risk assessments were consistent with the risk profile features and considerations outlined below, which are based on recognised indicators such as the [ACSI Modern Slavery Guide](#) and the [Global Slavery Index](#).

While a number of our suppliers presented moderately heightened risks due to industry or operational characteristics, we did not identify any suppliers with a high modern slavery risk. Additionally, based on our initial reviews, none of our reviewed suppliers had a poor human rights record.

Overall, our initial risk assessments indicated that suppliers within our operations and supply chain have a low to medium potential for modern slavery risks, and there have been no developments in the intervening period to suggest a reasonable likelihood of any materially increased risk. Most of our supply chain risk is in our suppliers' complex supply chains, which are not visible to the Norton Group. Where the risks of modern slavery are visible, the Norton Group's policies and procedures mitigate the risk as much as possible. It is standard practice in our engagement of all third party suppliers and service providers to contractually mandate compliance with all relevant laws and our policies, which include obligations related to modern slavery and human rights. Suppliers must also participate in our continuous improvement initiatives aimed at improving corporate governance and sustainability across a range of issues.

Risk profile

Our risk profile is summarised in the table below.

Risk	Description of risk
Sector /Industry	There is a moderate modern slavery risk associated with the mining and resources industry (which the Norton Group and its suppliers are a part of). The risks associated with mining are primarily in construction and logistics, and are most prevalent in high risk regions. The inherent risks associated with the mining and resources industry are mitigated for the Norton Group as our operations are limited to Australia. Additionally, as the Paddington and Binduli Operations, including surrounding mining infrastructure, is mostly constructed, we engaged in little construction in 2025.
Product / Service	A large portion of our supply expenditure is on consumables for mining and processing operations. These consumables include lubricants, chemicals, explosives. The risks of modern slavery at a direct supplier or manufacturing level are relatively low, as many of these products are highly specialised. The risks we identified are instead associated with the raw minerals used to produce these products further down the supply chain. Our direct suppliers of these products are generally Australian-based, have submitted their own modern slavery statements under the <i>Modern Slavery Act 2018</i> (Cth) and have policies addressing modern slavery risks. Another contributor to our supply expenditure is specialised mining services. These services include surveying, exploration, drilling and sampling. These services present a lower risk of employing base-level employees who are at a higher risk of being exposed to modern slavery as they are highly specialised. However, a number of our mining service suppliers are at risk of engaging in poor recruitment processes or temporary workers to assist with field work or sampling. Our key suppliers of these services have policies in place regarding working conditions. As mining services (e.g. drilling and exploration) are carried out within our mining areas, we have some visibility and ability to reduce these risks.
Geographic	A majority of our direct suppliers are located in Australia. However, some of our suppliers reside in higher risk countries and we also understand a number of our Australian suppliers source products from higher risk countries. We note that a number of these countries have significantly improved their slavery prevalence ranking in recent years, in particular Thailand, Vietnam and South Africa. The prevalence rankings for Brazil and India have worsened. As indicated by its ranking, Australia has a low prevalence of modern slavery. The countries our key suppliers are based in or source products from and their Prevalence Index Rank (out of 160) according to the Global Slavery Index 2023 are: • Thailand (79); • China (109); • Brazil (88); • India (32); • Indonesia (61); • Vietnam (106); • South Africa (133); • Singapore (139);

	• UK (143); • Canada (144); • Taiwan (146) • Australia (147); • Finland (151); • Ireland (153). Many of our key suppliers are large and reputable Australian suppliers of both products and services. These companies must also submit modern slavery statements addressing the risks within their supply chain. Many of these suppliers also address modern slavery risks within their corporate policies. We continue to work with our suppliers to better understand and manage any modern slavery risks within our extended supply chain and to ensure a commitment to continuous improvement.
Specific Entity	Many of our key suppliers have modern slavery policies in place or are required to report. We are not aware of any actual modern slavery practices within our supply chain or operations, nor of any evidence of a materially heightened risk beyond geographic impacts.

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, contractors, suppliers and the broader industry to combat modern slavery. That is why we remain committed to identifying and conducting initial or additional due diligence on any suppliers that we identify as having higher modern slavery risks and also to enhancing our existing processes to assess and address potential modern slavery risks, consistent with our Group wide commitment to continuous improvement initiatives. We did not identify any of our new or existing contractors or suppliers as high risk in the 2025 reporting period, therefore no further targeted due diligence was undertaken. We will continue to monitor our contractors and suppliers in future reporting periods to ensure that any who present high risks of modern slavery in their operations and supply chains are identified and further due diligence is undertaken to assist us to assess and manage the respective risk.

Policies and Procedures

In FY2025, the Norton Group continued to focus on consolidating and implementing existing policies and procedures to continuously improve our modern slavery compliance processes and our approach to human rights risk identification and mitigation. This included a tailored approach to different aspects of our operations and supply chain.

Regarding employees within our operations, actions to assess and address risk included the following:

- Continued focus on enhancing compliance with all relevant company policies, including those that address modern slavery and human rights principles, which reflects our commitment to addressing modern slavery and human rights risks in our business and driving accountability for ethical business practices across our organisation.
- Given the employment conditions and nature of our employee's roles, we consider that there is little likelihood of material modern slavery risks arising within (or because of) the Norton Group's workforce and for those reasons no standalone training program is delivered on such risks. Instead, HR internally actively manages employment relations and conditions to ensure an optimal workplace is maintained for all. That includes
 - Ensuring all employment contracts, conditions and employee entitlements comply with the *Fair Work Act* 2009 and National Employment Standards.
 - Accurately capturing and communicating role responsibilities and implementing rosters to ensure employees are not performing excessive hours.
 - Conducting annual better off overall tests (BOOT) to ensure employee wages are above minimum entitlements pursuant to the applicable modern award.
- Ensuring employees are aware of and comply with relevant policies. Supporting implementation of our whistle-blower policy, to ensure identification and investigation of any

material risks, which outlines how an 'eligible whistleblower' is able to raise concerns about potential, suspected or actual misconduct through an objective, confidential and independent reporting and investigative mechanism. The employee relations team provides a weekly HR update report to executive management regarding employee relations complaints and investigation outcomes. Programs are also made available to employees to help deal with grievances and support work-life balance, including Safe 2 Say, RU OK and Lifeskills Australia.

- These policies and practices are intended to enhance our policy framework to ensure that we continuously improve our practices in identifying and addressing modern slavery and human rights issues in our corporate operations, complementing the following general policies:
 - Recruitment and Selection policy which ensures all of our recruitment activities are in accordance with Australian laws and the enterprise agreement;
 - Protection from Bullying and Harassment Guideline which condemns and encourages the reporting of any instances of bullying or harassment;
 - Health and Safety Policy which identifies, assesses and manages risks to employees and builds a culture of risk awareness;
 - Environment and Community Policy which recognises the importance of meeting Commonwealth, State and Local legal requirements, not tolerating any form of discrimination or abuse as part of business activities; and
 - Mental Health and Wellbeing Policy which ensures that staff have safe working environments, that realistic targets are set which do not require staff to work unreasonable hours and that support and assistance is available for all staff.

Actions to assess and address risk relating to contractors involved in our operations included the following:

- A significant majority of the contractors that the Norton Group engages for its Australian operations is for specialised production or consulting work. These types of contractors are well educated, highly specialised and well paid, as such we consider that their modern slavery risks are inherently low.
- Once a contractor is successful in winning a scope of work with the Norton Group, a second phase of due diligence commences prior to being allowed entry to the Norton Group worksites. This multistage due diligence approach ensures modern slavery risks amongst contractors remains low and includes the following:
 - Inclusion of strict obligations to comply with company policies in standard terms & conditions for the supply of goods and services, which includes modern slavery principles and targeted express modern slavery provisions where it is considered appropriate by senior management for certain contractors.
 - The Norton Group also has dedicated sourcing and procurement procedures that reinforce and mandate compliance with relevant company policies and ethical business conduct, including regarding labour relations and human rights issues. These are also relevant to suppliers.

Actions to assess and address risk regarding suppliers overlap somewhat with those outlined above for contractors and included the following:

- Continuous improvement practices to strengthen corporate governance and sustainability across our supply chain. While the Norton Group does not mandate a single prescriptive program for all suppliers, it requires suppliers to engage in a range of initiatives aligned with our standards and expectations, including:
 - Compliance with the Norton Group's Supplier Code of Conduct, which outlines requirements relating to ethical business practices, labour standards, environmental management, and modern slavery risk mitigation.
 - Participation in periodic supplier performance evaluations where applicable, which assess safety, environmental, quality, and governance performance.
 - Engagement in corrective action processes where non-conformances are identified, including the development and implementation of improvement plans.

- Provision of relevant documentation and disclosures upon request, such as policies, certifications, and risk management procedures.
- Participation in inspections, or reviews where applicable, particularly for higher-risk suppliers or activities.
- Track and monitor supplier participation in these initiatives through contract management and procurement processes. This includes maintaining supplier records, monitoring compliance with contractual obligations and reviewing supplier performance on an ongoing basis. Non-compliance or performance gaps are addressed through formal contract management mechanisms, including corrective actions and follow-up reviews where required and where applicable. This approach enables NGF to progressively enhance supplier performance and promote responsible and sustainable business practices across its supply chain.
- Refinement and finalisation of a dedicated "Human Rights & Modern Slavery Questionnaire", to be completed by selected suppliers with an intended or actual annual expenditure above \$250,000, which is to be formally rolled out in early 2026. This will significantly enhance our existing risk assessment processes, further improving our ability to understand the extent to which suppliers address both modern slavery and human rights risks in their operations and supply chains and whether any red flags exist that warrant closer scrutiny.
- In certain circumstances, for suppliers that senior management consider higher risk, we include a standard modern slavery clause in our standard Services Agreements, which is the contractual mechanism through which such suppliers may be engaged. In addition to required commitments to comply with all relevant laws and policies, by signing the Services Agreement, Suppliers may also provide a number of warranties in relation to engaging in modern slavery practices and may also be required to monitor, report and limit modern slavery practices in their operations.
- For other suppliers, the contractual emphasis and obligation is on compliance with company policies and a commitment to ethical business practices, which include practices consistent with identifying and mitigating modern slavery risks.

Assessing our effectiveness

The Norton Group relies on a range of monitoring processes, internal reporting mechanisms and external consultants to assess the effectiveness of its modern slavery initiatives, which includes taking the following steps to help ensure continuous improvement in the effectiveness of our actions to address modern slavery:

- reviewing policies on an "as needs" basis, in particular if there has been a material legislative change;
- conducting thorough investigations into complaints, including to track and monitor outcomes as well as to provide regular reporting on cases to management, which supports the ability to identify trends and to assess the adequacy of existing controls. In that regard, we note that no modern slavery complaints were made, although the Norton Group investigated a small number of reports made via its whistleblower and "Safe 2 Say" anonymous complaints processes regarding other discrete employee relations matters;
- conducting an employee sentiment survey to assess employee satisfaction, which enables employees to raise any issues, including modern slavery or human rights concerns;
- assessing and reporting internally on the Norton Group's performance and assurances across key areas such as payment of wages, fair treatment, working and living conditions, employee freedom, safety guarantees, and grievance management; and
- obtaining independent external expert input on the identification and mitigation of modern slavery and human rights risks across its operations and supply chain.

In FY2025, we worked to further refine processes for reviewing and reporting on the effectiveness of these actions and any future action we take to address modern slavery.

Consultation

As a subsidiary of Norton Gold Fields Pty Ltd, Paddington Gold Pty Limited's approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across the Norton Group.

Prior to being put to the board of Norton Gold Fields Pty Ltd for review and approval, this statement was

reviewed by Paddington Gold Pty Limited and it was given an opportunity to comment.

FY2026 focus

We recognise there is a need for continued vigilance and room for continuous improvement in the steps we can take to assess and mitigate the risks of modern slavery in our operations and supply chains.

In FY2026 we will focus on:

- carrying out due diligence on newly engaged suppliers identified as having higher modern slavery risk;
- reviewing and refining aspects of our existing policies and procedures, where relevant, to ensure continuous improvement in our approach and outcomes in addressing modern slavery risks in our operations and supplier portfolio;
- refining our processes for reviewing, improving and documenting the effectiveness of actions we take to address modern slavery;
- successful roll out and implementation of the dedicated "Human Rights & Modern Slavery Questionnaire" for relevant suppliers;
- provision of a new creditor setup form that formally requires relevant prospective contractors to provide specific assurances as part of a modern slavery declaration;
- refining and updating the tender document to require contractors to detail the process to ensure the workforce engaged for the project will be engaged under legally compliant terms and conditions (including the Modern Slavery Act 2018) and to declare any existing labour-related (ER/IR) risks or issues;
- refinement and update of a new Modern Slavery Policy to better reflect best practice and principles tailored to our operations and evolving legal obligations; and
- continuing to emphasise to employees the nature, purpose and operation of the tools we have implemented to ensure compliance with relevant company policies and, in particular, to assist with our modern slavery compliance awareness and efforts.

Human Rights

Respect for human rights is the moral basis for the Norton Group's operations. We strive to meet the highest ethical standards to minimise potential adverse human rights impacts across our operations and supply chain.

In addition to modern slavery issues, we have assessed the Norton Group's activities against the UNGP. Our observations are organised into the following four widely recognised core themes, which collectively cover the principles identified within each theme. We have structured it this way to help minimise repetition when addressing these often closely interrelated or overlapping principles and outlining corresponding Norton Group actions or initiatives.

- Identifying and assessing actual or potential adverse human rights impacts that the company may cause, contribute to, or be directly linked to.
- Taking appropriate action and integrating findings from impact assessments across relevant company processes.
- Tracking the effectiveness of measures in order to assess whether they are working.
- Communicating with stakeholders about how impacts are being addressed and showing stakeholders that there are adequate policies and processes in place.

Given the broad nature of the UNGPs, we note that there is inevitably significant overlap between issues relevant to each theme, but we have endeavoured to avoid repeating points from one theme in another and the points expressly articulated in each theme are intended to supplement relevant points already articulated in others.

Identifying and assessing adverse human rights impacts

We consider that the Norton Group actions and initiatives outlined under this theme broadly encompass and address UNGP's 11, 12, 14, 16-18 and 23.

The Norton Group is committed to and insists upon a genuine respect for human rights and adherence to recognised principles that help ensure it does not harm or interfere with the rights of others. It does so by applying and enforcing a suite of relevant policies and procedures across its operations and taking prompt, effective steps to address any adverse impacts or risks that may arise.

The Norton Group's human rights initiatives are communicated internally throughout the reporting chain. Regarding its own employees, the Norton Group's commitment to protecting human rights and to acting consistent with the UNGPs is evidenced by its implementation of the HR processes outlined above.

The Norton Group adheres to a Human Rights Policy that was formulated at a group level and applies to all affiliated entities within the group. This policy commits the Norton Group to internationally recognised human rights standards and creates a clear, actionable framework for identifying, preventing, and mitigating human rights impacts. It expressly addresses the following key principles and commitments:

- UNGPs;
- UN Universal Declaration of Human Rights;
- UN Global Compact;
- the Voluntary Principles on Security and Human Rights (VPs);
- the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- Expresses commitment to the abolition of child labour;
- Expresses commitment to the elimination of forced labour;
- Commitment to anti-discrimination and anti-harassment; and
- Commitment to Human Rights of Indigenous Peoples.

The Norton Group also has regard to a number of publicly available group policies that are related to human rights issues, including those dealing with employment, community, business ethics, responsible supply chains and supplier management. These are relevant to the Norton Group's employees, contractors and international supply chain and are communicated by senior management, where relevant, across our operations.

The Norton Group incorporates due diligence of actual and potential human rights risks or impacts into its operations, including to provide updates to management in relation to the progress and outcomes of related employee relations investigations. Due diligence of the Norton Group's operations, including international supply chains, is also reflected in public annual ESG reporting by the group, which comprehensively and transparently deals with matters across the group of companies related to human rights.

Elements of due diligence are undertaken through existing business processes, which are flexibly applied and not intended to be structured as a comprehensive, end-to-end due diligence framework. These include:

- procurement and contracting processes, where relevant requirements may be incorporated into supplier engagements; and
- ongoing contract management, including monitoring of contractor performance and the capture of feedback or complaints from contractor personnel.

The Norton Group has experience with human rights policies and practices within its management team. We also rely on external expertise, where appropriate, to obtain independent expert input on human rights and related risk mitigation and compliance considerations.

Taking appropriate action and integrating impact assessment findings

We consider that the Norton Group actions and initiatives outlined under this theme broadly encompass

and address UNGP's 13, 15, 19 and 24, whilst noting that a number of points outlined in the preceding theme are also relevant.

The Norton Group's senior management take on primary responsibility for day-to-day development, running and implementation of relevant policies and procedures related to human rights, whilst express Board oversight is focused on formal approvals of new substantive policies, contractual controls and authorisation of the annual modern slavery statement for publication.

The Norton Group adopts a structured approach to identifying and addressing human rights and modern slavery risks within its operations and supply chain.

- Human rights initiatives are implemented internally throughout the reporting chain.
- The Norton Group exercises leverage through targeted contractual requirements for employees, contractors and our supply chain to prevent or mitigate adverse human rights impacts.
- Broad oversight is exercised through ESG reporting and escalation of significant issues to senior management, enabling allocation of resources and corrective action where required.

Responsibility for these matters is embedded across relevant functions to ensure appropriate oversight and accountability and implemented through a combination of existing policies, contractual controls, and operational processes.

- The procurement and contract management functions are responsible for implementing supplier due diligence processes, including the incorporation of human rights and modern slavery considerations into sourcing, contracting, and supplier performance management.
- The Norton Group's legal and compliance function supports the development and review of contractual provisions, policies, and frameworks relating to human rights and modern slavery.
- Site-based operational management teams are responsible for monitoring contractor performance during contract execution, including capturing and addressing any feedback or complaints raised by contractor personnel.
- Senior management maintains oversight of these activities through periodic reporting and review processes. This allocation ensures that responsibility is assigned to functions with direct influence over supplier engagement and operational delivery, while maintaining appropriate governance oversight.

The Norton Group has established internal processes that support the identification and management of human rights risks, including modern slavery, within its operational and procurement activities.

- Decision-making processes: Human rights considerations are integrated into procurement, contracting and contractor management processes. Where risks or issues are identified, they are assessed and addressed through established contract management and escalation pathways.
- Oversight mechanisms: The Norton Group conducts ongoing monitoring of contractor performance, including the review of feedback and complaints from contractor personnel.
- Budget allocation: Activities relevant to human rights or modern slavery (such as supplier due diligence, contract management and monitoring processes) are addressed within existing operational budgets. Where adverse impacts are identified, we take action commensurate with our level of involvement and leverage, including engaging with suppliers to implement corrective actions and improve compliance with our standards.

Where we cause or contribute to adverse human rights impacts, we will investigate incidents, implement corrective actions and provide appropriate remediation.

We focus first on actual or potential impacts that are most severe in accordance with informal application of risk-based considerations that are generally aligned with methodologies that explicitly rank human rights impacts.

Potential human rights-related issues, including modern slavery risks, are managed through NGF's procurement, contract management, and operational frameworks. Issues identified are assessed on a case-by-case basis, taking into account factors such as the nature and scale of the impact, the likelihood of harm, and NGF's level of involvement or leverage.

In practice, matters assessed as higher risk, including those with the potential for more significant or less easily remediable impacts, are more likely to be prioritised for escalation and action through existing management and contractual mechanisms. This may include engagement with contractors or suppliers and the implementation of corrective actions where appropriate.

A key aspect of our commitment to upholding and protecting human rights and to taking appropriate action to integrate impact assessment and best practice into our operations relates to how the Norton Group deals with suppliers. As outlined in the public 2024 Sustainability Report that applies to all related entities, suppliers must adhere to high ESG and human rights values and those that don't meet requirements will be identified and if they fail to take appropriate rectification measures will be terminated and blacklisted. Standard practice is that suppliers identified as not meeting requirements are terminated and blacklisted, with retention conditional on rectification commitments.

As outlined above, the Norton Group also have dedicated and confidential grievance mechanisms in place that allow for complaints or concerns to be lodged by confidential channels and for these complaints or concerns, including potential human rights issues, to be investigated by the employee relations team. This process allows for early identification and remediation of any potential human rights matters

Tracking effectiveness

We consider that the Norton Group actions and initiatives outlined under this theme broadly encompass and address UNGP's 20 and 31, although issues relating to the Norton Group's oversight of the effectiveness of its policies and procedures are detailed elsewhere in this statement.

Broadly speaking, as outlined above, the Norton Group's Employee Relations team conducts investigations and acts on enquiries that arise from complaints or anonymous notifications made in relation to human rights matters from internal and external sources. There were no express human rights complaints or enquiries in 2025. The team track investigation enquiries and report outcomes to senior management.

As previously described, we also track human rights performance through ESG performance indicators and compliance assessments conducted across operations.

As outlined above, Norton Group employees and contractors have access to dedicated and confidential internal grievance mechanisms. However, they may also access several public, external non-judicial grievance mechanisms, which include:

- WorkSafe WA - for workplace health, safety, bullying, and harassment concerns;
- Fair Work Ombudsman and Fair Work Commission - for fair employment conditions;
- Equal Opportunity Commission of WA – a state based commission which hears discrimination claims and human rights issues;
- Australian Human Rights Commission for federal discrimination and human rights issues;
- Australian National Contact Point complaint mechanism for third party complaints regarding business-related human rights abuses;
- Department of Mines, Petroleum and Exploration (DMPE) for environmental and mining-related community complaints; and
- Ombudsman of Western Australia - for complaints about State and local government authorities.

Communicating with stakeholders

We consider that the Norton Group actions and initiatives outlined under this theme broadly encompass and address UNGP's 21, 22, 29 and 30.

NGF manages external communication regarding human rights matters through its existing corporate and legal communication processes.

NGF is able to respond to external enquiries or concerns relating to human rights impacts where they are raised by or on behalf of affected stakeholders. Such matters are considered on a case-by-case basis and

are managed through appropriate internal channels, including consultation with relevant management and legal representatives.

The Norton Group advertises our 'Safe 2 Say' anonymous complaints process, which is linked to Crimestoppers in Western Australia.

Our whistleblower procedure is available to individuals and the communities within which we operate. The whistleblower procedure and the 'Safe 2 Say' anonymous complaints process is also advertised around the Norton Group's operations.

The Norton Group is also obliged under Australian Law to comply with requests to cooperate from WA Police, Department of Home Affairs, the Fair Work Commission, the Australian Human Rights Commission, Equal Opportunity Commission WA amongst other statutory bodies.

This statement was approved by the Board of Norton Gold Fields Pty Ltd and Paddington Gold Pty Limited in its capacity as principal governing body of Norton Gold Fields Pty Ltd and Paddington Gold Pty Limited on 22 June 2026.

This statement was signed by Wei Lin in his capacity as Chief Executive Officer and board member of Norton Gold Fields Pty Ltd and Paddington Gold Pty Limited.



Wei LIN

CEO

Norton Gold Fields Pty Ltd