Corporate Governance Charter

Greatland Resources Limited ACN 668 338 618

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1. INTRODUCTION

This corporate governance charter (**Charter**) is an overarching statement of the corporate governance structures, systems, principles, policies and practices to apply to Greatland Resources Limited (the **Company**) and its subsidiaries (together, the **Group**).

The Company is committed to implementing high standards of corporate governance. In determining what those high standards should involve, amongst other relevant governance guidelines and principles, the Company has adoptedthe ASX Corporate Governance Council Principles and Recommendations (4th Edition 2019) (**Recommendations**) and will ensure that its practices are consistent with those Recommendations in all material respects (unless expressly stated otherwise).

This Charter is intended to operate by way of a series of Sections and/or Appendices which may be added to or varied from time to time, the totality of which comprise this Charter.

The Company accepts that merely by the board of Directors (**Board**) adopting this Charter, of itself does not ensure the actual or cultural compliance within the Group of the principles, policies and practices espoused by this Charter. It is the Board's commitment to work towards the principles, policies and practices in this Charter becoming a practical and cultural reality for the Group in all respects.

This Charter has been adopted by resolution of the Board on the date appearing on the cover page and is effective from that date. It can only be amended or varied by resolution of the Board.

2. BOARD, DIRECTOR AND SENIOR EXECUTIVE MATTERS

2.1 Responsibilities of the Board and Management

2.1.1 Board responsibility

The Board is responsible for the overall management and strategic direction of the Company and for delivering accountable corporate performance in accordance with the Company's strategy and objectives.

In performing its role, the specific responsibilities reserved to the Board include:

- defining the Group's purpose;
- approving the Group's statement of values and code of conduct to underpin the desired culture within the Group;
- demonstrating leadership;
- providing strategic direction to the Group and deciding on the Group's strategies and objectives in conjunction with the Managing Director;

- monitoring the strategic direction of the Group and the attainment of its strategies and objectives, in conjunction with the executive, with a view to creating shareholder value;
- monitoring the operational and financial position and performance of the Company specifically and the Group generally;
- satisfying itself that the Company has in place an appropriate risk management framework (for both financial and non-financial risk), setting the Company's risk appetite and risk tolerance, assuring the principal risks faced by the Group are identified, and overseeing that appropriate control and monitoring systems are in place to manage the impact of such risks;
- reviewing and approving the Group's internal compliance and control systems;
- overseeing and assuring that the Group's financial and other corporate reporting mechanisms, including external audit, have integrity and are designed to result in adequate, accurate and timely information being provided to the Board;
- appointing, and where appropriate removing, the Managing Director and/or the Company Secretary as well as monitoring other key executive appointments, and planning for executive succession;
- overseeing and evaluating the performance of the Managing Director, and through the Managing Director, receiving reports on the performance of other executives;
- satisfying itself that the Company's remuneration policies are aligned with the Company's purpose, strategic objectives and risk appetite;
- reviewing and approving the Managing Director's and, in conjunction with the Managing Director, other executives' remuneration;
- approving the Group's budgets and business plans and monitoring major capital expenditures, acquisitions and divestitures, and capital management generally;
- as required, challenging management and holding management to account;
- ensuring that the Group's financial results are appropriately and accurately reported on in a timely manner in accordance with regulatory requirements;
- overseeing that the Group's governance systems and processes are designed and applied to assure compliance with all laws, governmental regulations and accounting standards;
- ensuring that the Group's affairs are conducted with transparency and accountability;
- overseeing the design and implementation of appropriate and effective governance policies, processes and codes of conduct for the Group, and monitoring and reviewing the effectiveness of those policies, processes and codes of conduct from time to time;
- appointing the Chair and Deputy Chair (as applicable) of the Board;
- ensuring sound Board succession planning including strategies to assure the Board is comprised of individuals who are able to discharge the responsibilities of directors of the Company; and
- overseeing security holder and stakeholder engagement, reporting and information flows.

2.1.2 Management Responsibility – Delegation of Authority

The Board has delegated to the Managing Director (for sub-delegation as appropriate to their executive and management team), authority over the management, operations and day-to-day affairs of the Company and the Group.

This delegation of authority includes responsibility for:

- developing business plans, budgets and strategies for consideration by the Board and, to the extent approved by the Board, implementing these plans, budgets and strategies;
- ensuring the Group's operations and business are within the parameters set by the Board from time to time and that the Board is kept informed of material developments in the Group's affairs, operations and business;
- where proposed transactions, commitments or arrangements exceed threshold parameters set by the Board, referring the matter to the Board for its consideration and approval;
- identifying and managing strategic, operational and corporate risks for the Group and, where those risks could have a material impact on the Group, formulating strategies for managing and mitigating those risks for consideration and endorsement (as applicable) by the Board;
- managing the Group's financial and other reporting mechanisms, and control and monitoring systems, to ensure that those mechanisms and systems capture all relevant material information on a timely basis, are functioning effectively and are founded on a sound basis of prudential risk management;
- ensuring that the Board is provided with clear and accurate information in a timely manner with respect to the Group, its operations, business and affairs to reasonably position the Board to fulfil its governance responsibilities; and
- implementing the policies, processes and codes of conduct approved by the Board and facilitating the monitoring and reviewing of, and reporting against, those policies, processes and codes of conduct.

The scope of the Managing Director's, roles, authorities and responsibilities (along with those of the other Senior Executives) must also be set out in formal job descriptions in their employment contracts with the Group.

The Managing Director will propose from time to time for consideration and adoption by the Board, a Delegated Authority Matrix (or similar instrument) specifying the levels of delegated authority applicable at Board, Managing Director, Executive Director, Company Secretary, Senior Executive and other management levels (as appropriate).

2.2 Directors

2.2.1 Appointment

Directors of the Board are appointed or elected (as applicable) in accordance with the Constitution.

2.2.1.1 Principles

Although the election of Directors is substantially determined by shareholders in general meeting, the Company commits to the following principles:

- The Board has an appropriate number of independent non-executive Directors who:
  - are the majority of the Board (unless special circumstances exist, are disclosed and are approved of by the Board as an exception to this requirement);
  - can challenge and hold management to account;
  - can represent and act in the best interests of the Company; and
  - maintain credible accountability to the Company's security holders (as a whole), regulators and stakeholders (as appropriate).
- The Board is of sufficient size so that the requirements of its business can be met, and succession changes to the composition of the Board and its Committees can be managed, without undue disruption.
- The Board comprises Directors with a blend of skills, experience and attributes appropriate for the Group and its businesses.
- The primary basis for the appointment of new Directors is their ability to add value to the Group and its businesses.
- The Board respects and values the benefit of diversity (including skills, experience, perspective, gender, culture, age and otherwise) to achieve the Group's objectives.
- All Directors respect the role of the Remuneration and Nomination Committee with respect to Board succession planning.

2.2.1.2 Checks

The Company will undertake appropriate checks (e.g. as to character, experience, education, criminal record and bankruptcy history) before putting a prospective Director forward for candidacy for election or appointment.

2.2.1.3 Material information to be provided to security holders

The Company will provide its security holders with "material information" relevant to a decision as to whether or not to elect or re-elect a Director, including:

- biographical details (including relevant qualifications, skills and experience);
- details of any other material directorship currently held by the person;
- a statement by the Board as to whether it supports the election or re-election of the person and a summary of the reasons why;
- a statement by the Board as to whether or not it considers the person qualifies as an "independent director";
- any other material information known to the Company and which the Board considers is likely to be material to the security holders' decision whether or not to elect or re-elect the person;
- for candidates standing for election for the first time:
  - material information arising from the checks the Company has conducted under Section 2.2.1.2; and
  - any prospective material conflict of interest, relationship or material circumstances that may influence or impact, in a material respect, the person's capacity to bring independent judgement and act in the best interests of the Company as a whole;
- for Directors standing for re-election, the term of office currently served by the Director.

The candidate for appointment/election/re-election as a Director should provide the Board / Remuneration and Nomination Committee with:

- the information referred to above;
- consent(s) for the Company to conduct background checks referred to in Section 2.2.1.2;
- details of their other material business and other commitments that may materially intrude upon the time the candidate has available in the performance of their role as a Director; and
- an acknowledgement that they have sufficient time available to commit to the Company and fulfil their responsibilities as a Director.

2.2.2 Agreement by Directors

Upon or prior to their anticipated appointment, Directors are to be issued a formal letter of appointment (for signing and acceptance by them personally at the time of their appointment) covering matters such as those set out in the Remuneration and Nomination Committee Charter.

By accepting appointment to office, the Director agrees to subscribe to and be bound by the Constitution and this Charter including its Appendices.

Should any information provided by a Director under Section 2.2.1.3 be false or incorrect in any material respect, then that Director undertakes to immediately tender that resignation as a Director if so requested in writing by the Board.

2.2.3 Indemnity Deed and D&O Insurance

The Company will execute with each Director a deed of indemnity in such reasonable industry accepted form settled by the Company's lawyers and approved from time to time by the Board.

The Company will arrange for the benefit of each Director, subject to cover availability at commercially acceptable premiums to the reasonable satisfaction of the Board, a policy of directors' and officers' insurance in such reasonable industry accepted form approved by the Board having regard to advice taken from the Company's insurance brokers and/or lawyers (if and as applicable).

2.2.4 Director "independence"

An independent Director operates independently of both executive management and a substantial security holder(s), and free of any interest, position or other relationship (personal, business or otherwise) that might materially influence, or could reasonably be perceived to materially influence, their capacity to exercise their unfettered and independent judgment on issues before the Board, and to act in the best interests of the Company as a whole, rather than those of an individual security holder or other person.

Independent Directors accordingly assist in ensuring that the Board and the Group operate in the best interests of the Company as a whole having regard to the goals and objectives of the Company.

Under ASX corporate governance principles, the assessment of whether a Director is independent is a matter of judgement for the Board and includes concepts of materiality. In making that judgement the Board may have regard to, but need not be bound by, the Recommendations as to director "independence".

All Directors and candidates for appointment as a Director are required to disclose to the Board and the Remuneration and Nomination Committee (via the Company Secretary) any interest, position, association, relationship or information (and any changes thereof) which may be relevant or material to that assessment.

The Board, or the Remuneration and Nomination Committee, should regularly (at least once each reporting period at or around the time candidates for Board election or re-election are considered and whenever a material change occurs to a Director's interest, position or other relationship which may impact upon their independence) assess the independence of each non-executive Director including whether in the opinion of the Board their length of service as a Director has impacted upon their independence.

The Chair, and at least a majority of Directors, should be independent, unless special circumstances exist, are disclosed and are approved of by the Board as an exception to this requirement.

The Company will disclose in its annual report or on its website:

- the names of its Directors who are considered by the Board to be "independent";
- if the Board considers a Director to be "independent" but they have an interest of the type set out in the Recommendations (in Recommendation 2.3 'Factors relevant to assessing the independence of a director'), an explanation as to why the Board considers them "independent";
- the length of service of each Director; and
- if the Board determines that a Director's previously assessed and disclosed "independence" has changed.

2.2.5 Conflicts of interest

All Directors have an obligation to be independent in judgment and actions and as Directors will take all reasonable steps to be satisfied as to the soundness of all decisions of the Board.

In circumstances where personal interests may conflict with those of the Company, or its stakeholders, steps must be taken by each Director to eliminate or manage such conflict.

Directors must disclose to the Board any direct or indirect interests in contracts or proposed contracts with the Company. Directors may not vote in respect of any such contracts or other arrangements in which they have any interest if it is a material interest and will not count in the quorum, unless the contract relates to certain matters specified in the articles. Directors must also disclose the nature and extent of any matter which could give rise to a conflict and the Board may authorise the conflict and may set conditions to the authorisation.

2.2.6 Directors' independent professional advice

A Director is entitled to seek independent professional advice (including but not limited to legal, accounting and/or financial advice) at the Company's expense on any matter connected with the discharge of their responsibilities, in accordance with the procedures and subject to the conditions set out below:

- the Director must seek the prior approval of the Chair (or Deputy Chair / senior or lead independent Director as appropriate having regard to the relevant circumstances);
- in seeking such prior approval, the Director must provide details of:
  - the nature of, and reasons for, the independent professional advice to be sought;
  - the likely cost of obtaining the independent professional advice; and

- details of the independent adviser the Director proposes to instruct.

- the approval of the Chair (or Deputy Chair / senior or lead independent Director as appropriate) must not be unreasonably withheld.

2.2.7 Director availability

Non-executive Directors must inform the Chair and the chair of the Remuneration and Nomination Committee before accepting any new appointment as a director of another listed entity, and any other material directorship or any other position with a significant time commitment attaching to it that might reasonably intrude from time to time on the ready availability of the Director in performing their responsibilities as a Director of the Company.

2.2.8 Directors' skills matrix

The Board will periodically undertake and/or review a "board skills matrix" (or similar exercise) to ensure the skills and experience of the Board reasonably cover those skills and experience that the Board believes are needed to address existing and emerging business and governance issues relevant to it.

The Company will disclose on its website or in its annual governance statement the mix of skills that the Board currently has and/or is looking to achieve in its membership.

2.3 Key office bearers

2.3.1 Chair

The Chair is responsible for leadership of the Board including;

- facilitating proper information flow to the Board;
- facilitating the effective functioning of the Board including managing the conduct, frequency and length of Board meetings; and
- communicating the views of the Board, in conjunction with the Managing Director, to the Group's security holders, broader stakeholders and to the public.

In performing their role, the Chair's responsibilities also include:

- in consultation with the Managing Director / Company Secretary:
  - setting the agenda for the matters to be considered by the Board;
  - seeking to ensure that the information provided to the Board is relevant, accurate, timely and sufficient to keep the Board appropriately informed of the performance of the Group and of any developments that may have a material impact on the Group or its performance and affairs;

- seeking to ensure that communications with security holders, stakeholders and the public are accurate and effective;

- seeking to ensure that the Board as a whole has the opportunity to maintain adequate understanding of the Group's financial position, strategic performance, operations and affairs generally and the opportunities, risks and challenges facing the Group;
- facilitating open and constructive communication amongst Board members and encouraging their contribution to Board deliberations;
- overseeing and facilitating Board, Committee and Board member performance and evaluation reviews and succession planning;
- liaising and interfacing with the Managing Director as the primary contact between the Board and management; and
- liaising with and counselling, as appropriate, Directors.

Subject to the terms of the Constitution, the Chair is appointed by the Board from amongst the Directors and holds office at the discretion of the Board until removed from office by the Board or until the Chair resigns from office or is no longer a Director.

In the absence of the Chair, the Deputy Chair (if there is one appointed by the Board) or the senior or lead independent Director, should assume the role that otherwise would be performed by the Chair if the Chair was not absent.

The Chair should be non-executive and "independent" and the roles of the Chair and the Managing Director should not be exercised by the same person, except in special circumstances approved of by the Board.

The Chair should ensure that their other positions and commitments are not likely to hinder the effective performance of their role as chair.

2.3.2 Deputy Chair

The Deputy Chair (if one is appointed), or the senior or lead independent Director if a Deputy Chair is not formally appointed, has the following responsibilities:

- to perform the role and functions of the Chair in the absence of the Chair for any reason;
- to be available to facilitate the following matters when and as appropriate and required:
  - Chair succession planning;
  - approvals and actions required to be performed by the Chair under this Charter, or its policies, where the Chair actually or potentially may be compromised due to personal or other conflict of interest;
- at the request of the Chair, to support the Chair in the performance of the role and function of the Chair.

The Deputy Chair should be an independent non-executive Board member and should not also be the Managing Director.

2.3.3 Company Secretary

The Company Secretary is directly accountable to the Board, through the Chair, on the matters below, irrespective of any other line management accountability to the Managing Director or other executives.

The appointment or removal of the Company Secretary is to be effected by a Board resolution.

The role and responsibilities of the Company Secretary include:

- advising the Board and its Committees on governance matters, and where appropriate or necessary facilitating advice from professional advisors;
- monitoring that Board and Committee policies and procedures are followed;
- co-ordinating the timely completion and despatch of Board and Committee papers;
- ensuring accurate minutes of business at Board and Committee meetings are prepared and entered in the Company's secretarial records in a timely manner; and
- helping to organise and facilitate Board member induction, professional development and evaluation / review procedures.

2.3.4 Managing Director

The Managing Director is accountable to the Board and reports to the Chair.

The Managing Director will accept the responsibility, on behalf of management, of the authority delegated in the terms of Section 2.1.2 of this Charter.

The Managing Director will enter into a formal executive services agreement with the Group which will include:

- a formal job description including position, duties and responsibilities;
- remuneration arrangements;
- term of tenure and how it may be terminated;
- any termination entitlements;
- performance review and evaluation arrangements (at least once each reporting period);
- the information set out in the Remuneration and Nomination Committee Charter for Directors.

2.3.5 Other Executive Directors

If there are other Executive Directors (besides the Managing Director), they will also be accountable to the Board and report to the Chair.

The Executive Director(s) will enter into a formal executive services agreement with the Group which will include:

- a formal job description including position, duties and responsibilities;
- remuneration arrangements;
- term of tenure and how it may be terminated;
- any termination entitlements;
- performance review and evaluation arrangements (at least once each reporting period); and
- the information set out in Section 3.2(a) of the Remuneration and Nomination Committee Charter for Directors.

2.3.6 Senior Executives

The Senior Executives are accountable to the Managing Director and to the Board through the Managing Director.

Senior Executives personally will enter into formal executive services agreements with the Group which will include:

- a formal job description including position;
- duties and responsibilities;
- to whom they report;
- remuneration arrangements;
- term of tenure and how it may be terminated;
- any termination entitlements; and
- performance review and evaluation arrangements (at least once each reporting period).

The requirement for Senior Executives to personally enter into a formal executive services agreement does not necessarily preclude the Company in appropriate cases engaging a professional services entity to provide designated services for a particular Senior Executive role on an outsourced basis.

2.3.7 Director and executive remuneration

The Company will pay Director remuneration sufficient to attract and retain high quality Directors and will also design its Senior Executive and executive remuneration arrangements to attract, retain and motivate high quality Senior Executives and executives and to align their interests with the creation of value for security holders consistent with the Company's values and risk appetite.

The Company has established the Remuneration and Nomination Committee to oversee (among other things) Director and Senior Executive remuneration.

The Company will separately disclose its policies and practices regarding the remuneration of non-executive Directors and the remuneration of Senior Executives.

To the extent that the Company's remuneration policy includes an equity-based remuneration scheme, it will include a statement on prohibiting participants in the scheme to enter into a transaction (whether through the use of derivatives or otherwise) which limit the economic risk of participating in the scheme, and the Company will disclose that statement on its website or in its corporate governance statement.

2.4 Directors and executives – Values, Code and Policy requirements

2.4.1 Greatland Values

The Company has adopted the Greatland Values, which apply to all Group personnel, including Directors and executives.

2.4.2 Code of Conduct and Policies

The Company has adopted the Code of Conduct, which applies to all Group personnel, including Directors and executives.

Directors, officers and executives shall also abide by such other policies, codes and protocols as may be adopted from time to time in the terms of this Charter and are expected to take a leadership role in their compliance and enforcement.

2.4.3 Performance enhancement and evaluation

2.4.3.1 Enhancement

The Company will provide induction programs for new Directors and executives as well as providing opportunities on request for the continuing professional development of existing Directors and executives to equip them to better serve the Company.

2.4.3.2 Evaluation and Review

The performance of the Board (as a whole), each Board Committee, Directors (individually) and each Senior Executive will be periodically reviewed, at least once each reporting period and at other times as decided upon by the Board, against measurable and qualitative benchmarks as may reasonably be determined from time to time by the Board having regard to generally accepted corporate governance standards.

This task is delegated by the Board to the Remuneration and Nomination Committee.

3. BOARD AND COMMITTEE MATTERS

3.1 Board meetings

3.1.1 Procedures

As far as possible, agendas and supporting papers shall be despatched a reasonable period in advance of the meeting.

A meeting may be cancelled by the Chair (or acting chair) if they reasonably consider there is insufficient business to warrant holding a meeting.

The Constitution requires at least two Directors to form quorum. Based on the current size and composition of the Board, the Directors have determined that for the time being a quorum should require (i) at least three Directors, and (ii) at least one of the Chair or Deputy Chair.

3.1.2 Frequency

Subject to the Constitution, the Board should meet at least six times per annum, and as often as is necessary to effectively and efficiently fulfil its functions and discharge its responsibilities

3.1.3 Voting

Although the preferred method of decision making is by consensus, and subject to any overriding provision in the Constitution, if a formal vote is required:

- each member of the Board including the Chair shall have one vote; and
- in the case of an equality of voting, the Chair shall have a casting vote in addition to their deliberative vote (except where there are only two Directors entitled to vote on the resolution before the meeting).

3.1.4 Minutes

Draft minutes of each Board meeting shall be recorded by the Company Secretary, initially settled by the meeting Chair and distributed to each Director of the Board in a prompt and timely manner after each Board meeting.

The minutes of each meeting shall be submitted to the next succeeding meeting of the Board for formal approval by the Board and signing by the meeting Chair as a fair and correct record of proceedings.

The minutes shall be entered into the Company's secretarial records at least within such time periods as may be prescribed by statute or regulation and in any event within one month of the meeting.

3.1.5 Venue and time

Board meetings should be held at such place and time as determined by the Chair to meet the needs of the Company. To the extent practicable the Chair will endeavour to meet the reasonable convenience and availability of the members of the Board in setting the meeting times and venues.

Meetings may be held or attended using any technology considered appropriate (such as video conferencing platforms).

3.1.6 General

Meetings of the Board shall be conducted in compliance with applicable law, the Company's Constitution, the Corporations Act and this Charter, and otherwise in accordance with generally accepted procedures for board meetings.

Subject to the foregoing, and the other provisions of this Charter, the Chair (or in the absence of the Chair, the Deputy Chair if there is one or otherwise the senior or lead independent Director) shall determine the manner and process by which Board meetings shall be held.

The Board should consider meeting periodically in "closed session" without executive Directors and executives present.

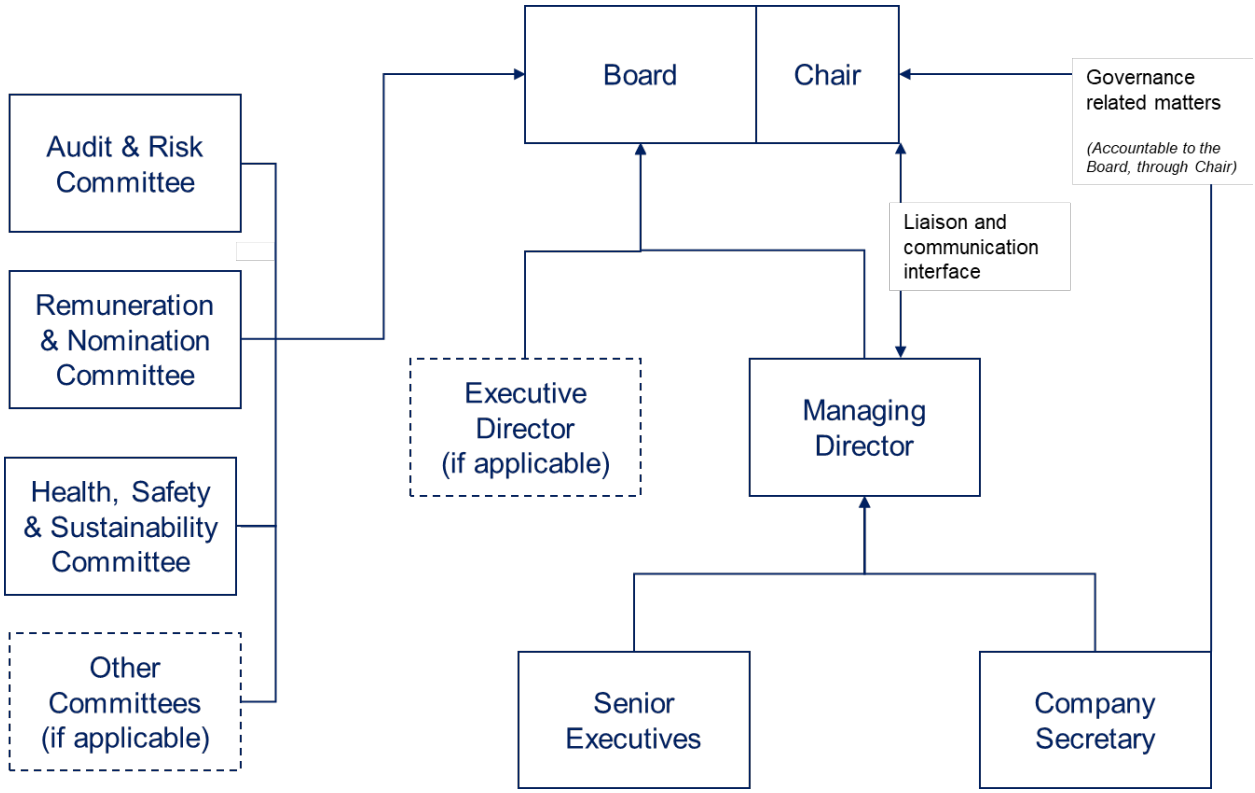
3.1.7 Board calendar

To assist the Board in ensuring timely discharge of its duties each year, the Board may from time to time adopt a planning calendar. The planning calendar shall be developed by the Company Secretary in consultation with the Chair and the Managing Director.

3.2 Board Committees

3.2.1 Overall Board, Committee and key office bearer structure

The Board, Committee and key officer bearer structure and accountability flows is as follows:



3.2.2 Committee structure

The Board has established the following standing Committees to assist the Board in the performance of its responsibilities:

- Audit and Risk Committee;
- Remuneration and Nomination Committee; and
- Health, Safety and Sustainability Committee.

Other Committees may from time to time be established by the Board to deal with discrete functions or matters of special importance to the Group. The Board has also established a Disclosure Committee which meets on an ad-hoc basis.

3.2.3 Committee Charters

Each Committee has an approved Committee Charter under which authority is delegated by the Board. The Committee Charters for each standing Committee are set out in Appendices A2, A3 and A4, respectively, to this Charter.

A proforma template for the governance structure and procedural workings of each Committee (subject to the specific Committee Charter for each Committee) appears as Appendix A1.

Generally, Committees have an advisory, reporting and recommending function only to the Board. The Board remains responsible for the exercise of power by the Committees, unless the Board has specifically delegated deliberative and/or executive power to the Committee and the Board believes on reasonable grounds in good faith and after making proper enquiry:

- that the Committee would exercise the power in conformity with the duties imposed on the Directors, meeting as the Board, by applicable law and the Constitution; and
- that the Committee is reliable and its members competent in relation to the powers delegated.

3.2.4 Committee membership and operations

Committees are to be comprised of Directors (together with others, where appropriate and allowed under the relevant Committee's charter) who desirably have relevant attributes, skills and experience having regard to the charter and functions of the Committee. Committees may invite others to attend their meetings at the discretion of the Committee chair and/or the Committee itself.

Relevant business addressed at Committee meetings is to be summarised and reported (as reasonably practicable) to the Board at its next meeting after the Committee meeting.

3.2.5 Disclosure

The Company will disclose on its website or in its corporate governance statement:

- the charters of each Committee;
- the members of each Committee and their relevant qualifications and experience; and
- in relation to each reporting period the number of times each Committee met throughout the period and the individual attendances of each Committee member at those meetings.

4. ORGANISATIONAL VALUES, CODES AND RELATED POLICIES

4.1 Culture and Values

The Company will seek to establish and maintain a culture across the Group of acting lawfully, ethically and responsibly.

The Company will articulate and disclose on its website or in its corporate governance statement, its "values" being the guiding principles and norms that define the type of organisation the Company aspires to be and what it requires from its Directors, Senior Executives and employees to achieve that aspiration.

The Board will approve the Company's statement of values with the Managing Director and Senior Executive team responsible to instil those values throughout the Group, including by appropriate training and by continually referencing and reinforcing those values in their dealings with the Company's stakeholders through setting "tone from the top".

The Greatland Values statement appears in Appendix B1.

4.2 Code of Conduct

The Company has adopted a Code of Conduct in the form of Appendix B2 (**Code of Conduct**), which applies to all Group personnel (including Directors).

Any material breaches of the Code of Conduct must be reported to the Board or to the Audit and Risk Committee, including via the Company's managerial structure as applicable, for consideration and remedial action (as appropriate).

4.3 Related Policies

The Company has adopted:

- a Speak Up Policy in the form of Appendix B14; and
- an Anti-Bribery and Corruption Policy in the form of Appendix B3;

Copies of those policies will be disclosed on the Company's website or its corporate governance statement.

Any material breaches of those policies must be reported to the Board or to the Audit and Risk Committee, including via the Company's managerial structure as applicable, for consideration and remedial action (as appropriate).

5. SECURITY HOLDER RELATED MATTERS

5.1 General

The Company will provide its security holders with appropriate information and facilities to allow them to exercise their rights as security holders effectively.

This includes provision of information about the Group and its governance to investors via the Company's website including:

- having a corporate governance area for the posting of all relevant governance, regulatory reporting, ASX, AIM and media announcements, and investor, security holder and other relevant corporate related information;
- a copy of this governance charter (and any amendments or additions to it from time to time) being posted;

- names, photographs and brief bios for each of its Directors and Senior Executives;
- once they are known, key expected dates for the AGM, results presentations, and books closing/dividend entitlements (as applicable);
- historical security price history;
- contact details for enquiries; and
- dividend and distribution policies and history (as applicable).

Communications with investors, security holders and the public are to be open (subject to appropriate confidentiality constraints) and honest.

5.2 Security Holder Meetings

The Company facilitates and encourages participation at meetings of security holders. The Company uses its annual general meeting (**AGM**) as an opportunity to engage with its security holders and seek their input on the management of the Company. The Company will take a number of steps to seek to maximise shareholders' ability to participate in the AGM process by:

- making Directors, members of the executive, and the external auditor available at the AGM;
- allowing shareholders in attendance at the AGM a reasonable opportunity to ask questions regarding the items of business, including questions to the external auditor regarding the conduct of the audit and the preparation and content of the auditor's report; and
- enabling participation of security holders:
  - through use of technology as appropriate; and
  - for those who are unable to attend meetings, providing an opportunity to submit questions ahead of the AGM.

Without intruding upon the discretion of the Chair (acting in good faith in the performance of their office), it is the expressed intent that all substantive resolutions at meetings of security-holders are to be decided by a poll rather than a show of hands.

6. RISK

The Company will establish a sound risk management framework and periodically review the effectiveness of that framework.

In particular, the Company has established the Audit and Risk Committee to oversee (among other things) risk, pursuant to Section 3.2 and in accordance with the Committee Charter set out in Appendix A2 and the Risk Management Policy set out in Appendix A11.

The Board (including through its Audit and Risk Committee) will review the Company's risk management framework at least once each reporting period to satisfy itself that it continues to be sound and that the Company is operating with due regard to the risk appetite set by the Board,

and will disclose on its website or in its corporate governance statement, whether such a review has taken place.

7. GOVERNANCE POLICIES

The Company has adopted the:

- **Greatland Values** statement set out in Appendix B1;
- **Code of Conduct** set out in Appendix B2; and
- the following **Governance Policies:**
  - Anti-Bribery and Corruption Policy set out in Appendix B3
  - Communications and Social Media Policy set out in Appendix B4
  - Continuous Disclosure Policy set out in Appendix B5
  - Cultural Heritage and Communities Policy set out in Appendix B6
  - Diversity and Inclusion Policy set out in Appendix B7
  - Environmental and Climate Change Policy set out in Appendix B8
  - Human Rights Policy set out in Appendix B9
  - Risk Management Policy set out in Appendix B11
  - Securities Dealing Policy set out in Appendix B12
  - Supplier Code of Conduct set out in Appendix B13
  - Speak Up Policy set out in Appendix B14
  - Workplace Health, Safety and Wellbeing Policy set out in Appendix 15

If the Board adopts a new code or policy relating to the governance of the Group (or any part of it), it is to be included as an Appendix to this Charter and from that date will apply as if it formed part of this Charter.

8. FINANCIAL INTEGRITY AND ASSURANCE

8.1 External audit function

The Company commits to the external audit of its books and affairs by the appointment of an independent external auditor who satisfies the “independence” requirements of the relevant accounting standards, ASIC and the ASX for listed public companies.

In particular, the external auditor must be independent of and have no relevant material interest, associations or dealings (other than as auditor in the discharge of the duties associated with that appointment) with the Group or any Director or other officer of the Group.

The Audit and Risk Committee Charter sets out the Company's policy as to external auditor appointment.

The external auditor is required to attend the Company's annual general meeting.

8.2 Managing Director and CFO financial reports verification

Before the Board approves the Company's financial statements for a financial period, the Board will require the Managing Director and the CFO (or their equivalents) to state in writing to the Board:

- that in their opinion the Company's relevant financial reports have been properly prepared and present a true and fair view of the Company's financial condition, performance and operational results and are in accordance with appropriate and relevant accounting standards; and
- that their opinion has been formed on a sound system of risk management and internal compliance and control which implements the policies adopted by the Board, and that the Company's risk management and internal compliance and control system is operating efficiently and effectively in all material respects.

9. DISCLOSURE

9.1 Disclosure of process to verify reports and financial statements

The Company will disclose on its website, in its annual report, in its corporate governance statement or in its governance disclosures as part of its annual report, the process(es) it uses to verify the integrity of any periodic corporate report it releases to the market that is not audited or reviewed by its external auditor.

Generally, without limitation, that process is by a disciplined process of accountability checks with the Company Secretary and Managing Director taking joint responsibility to ensure that there are in place effective vetting and authorisation processes designed to ensure that all such periodic reports:

- are made in a timely manner;
- are factually correct in all material respects;
- do not omit material information;
- are expressed in a clear and objective manner;
- do not mislead or deceive; and

- provide the intended recipients of the reports with appropriate information having regard to the nature and intent of the report.

9.2 Continuous Disclosure

The Company has adopted the Continuous Disclosure Policy in the terms of Appendix B5, in order to comply with its continuous disclosure obligations under the ASX Listing Rules, Corporations Act, AIM Rules and the Market Abuse Regulation. The Board has established a Disclosure Committee and the Board has delegated responsibility for effective implementation of the Policy to the Committee.

The Company will ensure that each member of its Board receives a copy of all material market announcements either before or promptly after they have been made.

The Company will ensure that whenever it gives a new and substantive investor or analyst presentation it will release a copy of the presentation materials on the ASX Market Announcements Platform and through RNS announcements platform, ahead of the presentation.

9.3 Governance Disclosure – ASX Recommendations

The Company commits to compliance with the disclosure requirements of the Recommendations.

Specifically:

- a current copy of this Charter (including its Appendices) is to be posted to the Company's website with timely updates of any variations to it;
- the disclosure requirements of the Recommendations are to be observed by the Company;
- in compliance with the Recommendations, the Company will disclose in its annual report or on its website:
  - material exposures:
    - whether it has any material exposure (i.e. a real possibility that the risk in question could substantially impact the Company's ability to create or preserve value for security holders over the short, medium or long term) to environmental risks or social risks (as defined in the glossary section of the Recommendations); and
    - it if does, how it manages or intends to manage those risks;
  - internal audit:
    - if it has an internal audit function, how the function is structured and what role it performs; or
    - if it does not have an internal audit function, that fact and the processes it employs for evaluating and continually improving the effectiveness of its governance, risk management and internal control processes.

10. GLOSSARY

Capitalised terms used in this Memorandum have the following meanings.

Term	Meaning
AIM	the AIM Market of the London Stock Exchange.
Appendix	an appendix to this Charter.
ASX	the Australian Securities Exchange.
Audit and Risk Committee	the audit and risk Committee of the Board, the Committee Charter for which is set out at Appendix A2.
Board	the board of Directors of the Company.
Charter	this corporate governance charter as adopted by the Board of the Company, as it may be varied from time to time by resolution of the Board.
CFO	the chief financial officer of the Company, or the person within the Company who effectively fulfils that function.
Chair	the chair of the Board.
Code of Conduct	the code of conduct which is set out at Appendix B2.
Committee	a committee of the Board.
Committee Charter	the charter and terms of reference specific to each Committee.
Company	Greatland Resources Limited ACN 668 338 618, a company incorporated in Western Australia
Company Secretary	the company secretary of the Company, or if there are joint company secretaries of the Company, then it means one or both of the joint company secretaries as the context requires.
Companies Act	the *Companies Act 2006*.
Constitution	the constitution of the Company.
Corporations Act	the (Australian) *Corporations Act 2001* (Cth)
Director	a person duly appointed or elected to the Board as a director of the Company.

Term	Meaning
'Ensure' and **'Assure'**, and derivations of those words	when used in relation to the responsibilities or duties of a Director, the Chair, the Board, the Managing Director, CFO, Company Secretary or other officer of the Company, means to take all reasonable steps, measures and actions, and to make all reasonable and appropriate enquiries, within the person's scope of authority and within the resources reasonably available to the organisation within the scope of authority of that person, so that the stated matter which is to be "ensured" or "assured" might reasonably be expected to be appropriately addressed, actioned or done, or not, as the context requires.
Executive Director	a person, other than the Managing Director, who is employed by the Company as an executive and is also a Director of the Company.
Governance Policies	the codes and policies set out in Appendices B1 to B15 of this Charter.
Group	the Company and its subsidiaries.
Health, Safety and Sustainability Committee	the health, safety and sustainability Committee of the Board, the Committee Charter for which is set out at Appendix A4.
Managing Director	the Managing Director of the Company.
Market Abuse Regulation or **MAR**	Regulation (EU) 2014/596 as it forms part of UK law by virtue of the European Union (Withdrawal) Act 2018, as amended and supplemented.
Recommendations	the Australian Securities Exchange (ASX) Corporate Governance Council Principles and Recommendations (4th Edition 2019).
Remuneration and Nomination Committee	the remuneration and nomination Committee of the Board, the Committee Charter for which is set out at Appendix A3.
reporting period	the financial period covered by the Company's annual report..
RNS	a regulatory news service having the meaning given to such term in the AIM Rules.
Section	a section or paragraph of this Charter.
Senior Executive	an executive who reports directly to the Managing Director (but excludes an Executive Director).

Board Committees Governance and Procedures

1. Establishment

Board Committees are established under the authority of the Board in accordance with the Company's Constitution and Corporate Governance Charter (**Corporate Governance Charter**). Capitalised terms used in this document which are not defined have the meanings given in the Corporate Governance Charter.

Each Committee should be established and operated under a Committee charter (**Committee Charter**) which includes the composition, terms of reference, functions and procedures of the Committee. Committees should be of sufficient size and independence to discharge their mandates effectively, including appropriate diversity of skills, experiences, perspectives, styles and attributes.

2. Membership

The members of a Committee shall be appointed, or re-appointed, by the Board in compliance with the Constitution and the Charter and should consist of:

- a Committee chair; and
- not less than two members in total.

Save for the Disclosure Committee, all Committee members must be Directors, and the Committee chair and at least a majority of the Committee members should be independent non-executive Directors. Specific Committee Charters may prescribe additional requirements.

The period of appointment of each Committee member will be at the discretion of the Board or until the member retires from the Committee.

The charter for a Committee may specify particular Senior Executives (**Nominated Senior Executive**) who will normally be responsible for Committee materials and information, and available for attendance at Committee meetings. The Committee may invite other persons to attend Committee meetings at its discretion.

3. Chair

The Committee chair shall chair meetings of the Committee. In the absence of the Committee chair, the Committee will elect another to chair meetings of the Committee.

4. Committee secretary

The Company Secretary or their delegate will perform the usual corporate secretarial role for the Committee. Where the Company Secretary is excluded from attendance due to potential conflicts or confidentiality issues, a member of the Committee will be designated to attend to that function.

5. Meeting procedures

Standing Committees should meet at least two times in each financial year, or as required, on dates and times agreed by the members, or as called by the Committee chair or at least two Committee members.

As far as possible, Committee agendas and supporting papers should be distributed to Committee members a reasonable period in advance of the meeting. If there is a Nominated Senior Executive responsible for the relevant Committee, they will be responsible for Committee materials including agendas and supporting papers, in conjunction with the Managing Director.

A quorum will comprise at least half of the members of a Committee, but in any event not less than two members.

6. Decisions and resolutions

Where formal voting is required, each member of the Committee including the Committee chair will have one vote, and in the case of equality of votes the Committee chair will have an additional casting vote.

7. Minutes

Minutes of each meeting should be prepared by the Committee secretary, settled by the Committee chair and distributed to each member of the Committee promptly following the relevant meeting.

Once finalised, the minutes of a Committee meeting should be submitted:

- to the next meeting of the Committee for formal approval by the Committee as a fair and correct record of proceedings, and signing by the Committee chair; and
- to the next meeting of the Board for its noting.

8. Power, authority and external advice

Subject to the Charter and the Committee Charter, Committees have the power and authority to do all things necessary or incidental in the proper performance of their role including authority to access information and to consult with and interview Greatland personnel and to take external professional advice as necessary and appropriate.

9. Reporting (periodic)

The Committee, through its chair, shall report in summary to the Board at the next Board meeting after each Committee meeting. The report should include:

- material issues arising at the meeting of the Committee and any formal resolutions or recommendations to the Board arising; and
- any matters that in the opinion of the Committee should be brought to the attention of the Board.

10. Reporting (annual)

In addition, the Committee, through its chair and with the assistance of the Nominated Senior Executive and the Company Secretary, shall submit a report annually to the Board summarising the Committee's activities during the relevant financial year. This report shall be submitted at the first Board meeting following the conclusion of the relevant financial year.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-002	Yes

Audit and Risk Committee – Committee Charter

1. Establishment

The Audit and Risk Committee (**ARC**) is established under the authority of the Board in accordance with the Company's Constitution and Corporate Governance Charter (**Corporate Governance Charter**). Capitalised terms used in this ARC Charter which are not defined have the meanings given in the Corporate Governance Charter.

2. Remit

The remit of the ARC is to oversee and act as a recommending, reviewing, monitoring and reporting forum of the Board in respect of:

- the Group's consolidated financial reports;
- the performance and independence of the Group's external (and, if applicable, internal) audit functions of the Group; and
- overseeing the process and systems for identifying risks to the Group and the implementing appropriate controls, monitoring and reporting mechanisms.

3. Scope

The scope of the ARC includes, but is not necessarily be limited to, the following matters.

3.1 Audit

(a) Accounting policies, financial statements and reporting

- review annual and half-yearly financial reports and statements with management and the external auditor;
- overseeing and monitoring application of accounting policies and reporting of financial information;
- overseeing whether the Group's financial statements reflect the understanding of the ARC members and whether in their opinion they provide a true and fair view of the financial position and performance of the Group;
- reviewing the appropriateness of relevant accounting judgements or choices exercised by management in preparing the financial statements;
- overseeing the adequacy of the Group's corporate reporting processes;

(b) Tax compliance

- reviewing and monitoring the operational effectiveness of the Group's tax compliance;
- reviewing the appropriateness of critical tax policies and judgements applied in the preparation of financial reports and compliance obligations;

- reviewing the Group's tax profile, including its effective tax rate and the basis for any significant deviation from the prevailing corporate tax rate;

(c) Internal control environment and audit

- overseeing and monitoring the scope and adequacy of the Group's internal controls and compliance requirements with a view to ensuring integrity in the Group's operations and affairs;
- assessing the need, or otherwise, for the Group to have a dedicated internal audit charter, internal audit plan and/or internal auditor (and if so approving such charter, plan and appointment of the internal auditor);
- if an internal audit function is required, then:
  - approving and ensuring appropriate resourcing of the function, including recommendations as to budgetary allocation for staffing and external consulting support (as necessary) noting that the CFO is responsible for the internal audit function;
  - ensure that the head of that function has a direct reporting line to the ARC and the Board;
  - reviewing and assessing the performance and objectivity of the Group's internal audit function, as applicable;

(d) External audit

- recommending selection, removal (as appropriate) and remuneration of the Group's external auditor (the **Auditor**) and monitoring Auditor independence;
- providing instruction to the Auditor with a view to ensuring adequacy of the external audit (the **Audit**);
- ensuring the availability of any assistance as reasonably required by the Auditor;
- receiving the Auditor's draft or preliminary Audit or Review Reports;
- overseeing and monitoring implementation of the Auditor's recommendations (to the extent accepted);
- ensuring that the Audit approach covers all financial statement areas where there is a perceived risk of material misstatement;
- periodically reviewing the Auditor's performance;

3.2 Risk

(a) Risk management and reporting

- recommending the Group's appetite and tolerance for risk;
- endorsing and monitoring the Group's risk management framework;
- monitoring and endorsing policies for identifying and managing, mitigating or transferring risk including in accordance with the Group's Risk Management Policy;

- monitoring and endorsing policies for business continuity and crisis planning risk management;
- reviewing the Group's risk management framework and risk register at least annually;
- monitoring contemporary and emerging risks affecting the Group, including cyber security;
- reviewing any material incident involving fraud or other breakdown of the Group's internal controls, management's response to that incident, and lessons learned, and reporting to the Board;

(b) Insurance

- reviewing the Group's insurance program to ensure the Group carries appropriate levels of insurance;
- endorsing the renewal and/or placement of all insurance programs, including associated policy limits, deductibles and premiums;

(c) Investigations

- identifying, initiating and overseeing special investigations as the ARC sees fit, or as directed by the Board, in relation to its responsibilities; and
- requesting and reviewing reports from management concerning material incidents (such as actual and suspected breaches of the law), and reviewing systems to manage this risk.

3.3 Other

The ARC may be requested by the Board to perform other related tasks or functions.

4. Governance

The Board Committees Governance and Procedures applies to the ARC subject to the following:

(a) Membership of the ARC

- The ARC must comprise at least three members, including:
  - Chair: an independent non-executive Director who is not the Board Chair;
  - a majority of independent non-executive Directors;
  - no executive Directors.
- Directors who are not ARC members may attend ARC meetings at their discretion as an observer.
- The Company Secretary shall be the Secretary of the Committee.
- Expertise and experience:
  - collectively the ARC should have the (i) accounting and financial expertise; (ii) risk management and insurance expertise; and (iii) sufficient understanding of the Group's business (including technical aspects) to effectively discharge its mandate; and
  - each ARC member should desirably (i) be financially literate; and (ii) have knowledge or experience in risk management and/or insurance.

- The Managing Director, CFO and Chief Operating Officer will generally be available to attend ARC meetings at the discretion of the ARC.

(b) Meeting frequency

The Committee shall meet at least two times per reporting period and at other times as the Committee Chair, a Committee member, or the Committee Secretary, requires.

(c) Other special provisions

The Company will disclose on its website or in its annual report:

- the relevant qualifications and experience of the members of the ARC;
- in respect of audit and internal audit specifically:
  - whether the Company has an internal audit function;
  - if it does, how the function is structured and the role it performs;
  - if it does not, that fact as well as the processes it employs for evaluating and continually improving the effectiveness of its risk management and internal control processes;
- in respect of each reporting period, whether the ARC has reviewed the Group's risk management framework.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-003	Yes

Remuneration and Nomination Committee – Committee Charter

1. Establishment

The Remuneration and Nomination Committee (**RNC**) is established under the authority of the Board in accordance with the Company's Constitution and Corporate Governance Charter (**Corporate Governance Charter**). Capitalised terms used in this RNC Committee Charter which are not defined herein have the meanings given in the Corporate Governance Charter.

2. Remit

The remit of the RNC is to oversee and act as a recommending, reviewing, monitoring and reporting forum of the Board in respect of:

- the remuneration of Directors, the Managing Director, Senior Executives and other executives;
- the identification, recruitment, retention, succession planning, evaluation and review, induction and professional development of Directors including the Managing Director; and
- the Company's Diversity and Inclusion Policy.

3. Scope

The scope of the RNC includes, but is not necessarily be limited to, the following matters.

3.1 Remuneration

(a) Generally

- reviewing prevailing external remuneration benchmarks for comparable positions, with comparable responsibilities, within comparable companies in comparable industries to that of the Group;
- assessing appropriate remuneration policies, levels and packages for Directors, the Managing Director, and (in consultation with the Managing Director) the Senior Executives and other executives;
- reviewing and considering for recommendation to the Board remuneration packages for the Managing Director, Senior Executives and executives;
- monitoring the implementation by the Group of its remuneration policies;

(b) Non-executive Directors

- reviewing and recommending to the Board the appropriate level of the shareholder approved Directors' remuneration pool (**Approved Pool**);
- reviewing and recommending to the Board, within the limits of that Approved Pool, an appropriate remuneration framework including the remuneration levels for the Chair, the

Deputy Chair (if any) and non-executive Directors, and any supplements to those remuneration levels for Committee participation including for chairs of Committees; and

- recommending any occasions where extra remuneration for extra services or special exertion is appropriate.

3.2 Nomination

(a) Board membership

- Board and Board Committee membership, succession planning and performance including through the development and use of a board skills matrix:
  - assessing the mix of skills, experience and diversity that the Board is looking to achieve in the Board's membership;
  - assessing the mix of skills, experience and diversity represented on the Board;
  - as required, establishing processes for the identification and recruitment of suitable candidates for appointment to the Board, including preparing a description of the role and capabilities required for a particular appointment, and for re-election of existing Directors (as applicable);
  - assessing the "independence" of each non-executive Director, at least annually, including at or around the time of consideration of Director elections, and as soon as practicable after any material change in relevant circumstances;
  - reporting to the Board with a view to the Board assessing whether the "independence" of a Director, including any person who has served as a Director for more than 10 years, has been compromised;
- considering prospective Director suitability for candidacy, having regard to the checks and matters referred to in Section 2.2 of the Corporate Governance Charter;
- reviewing and making recommendations on the composition of Board Committees;
- developing and implementing a process for evaluation of Board, Committee and Director performance;
- ensuring that new Directors are appointed pursuant to appropriate letters of appointment;
- Director induction and professional development including:
  - regularly reviewing whether the Directors as a group have the skills, knowledge and familiarity with the Group and its operating environment required to adequately fulfil their role on the Board and its Committees effectively;
  - where gaps are identified, considering what training or development could be undertaken to fill the gaps;
  - where necessary, providing resources to help develop and maintain its Directors' skills and knowledge;
- regularly reviewing the time and commitment required of its non-executive Directors and whether Directors are meeting the Company's requirements;

(b) Managing Director and Senior Executives

- periodically reviewing the job description and performance of the Managing Director according to agreed performance parameters;
- succession planning for the Managing Director position;
- overseeing and where appropriate being directly involved in any complaints, grievance or disciplinary processes in respect of the Managing Director or Senior Executives;
- supporting and providing guidance to the Managing Director (as required) with respect to Senior Executive recruitment, performance and succession planning;

(c) Diversity and inclusion

- developing, monitoring and reviewing the Diversity and Inclusion Policy;
- developing, monitoring and reviewing the Group's strategies and programs to promote diversity in the Group consistent with the Diversity and Inclusion Policy; and
- monitoring the implementation by the Group of the Diversity and Inclusion Policy and its effectiveness.

3.3 Other

The RNC may be requested by the Board to perform other related tasks or functions.

4. Governance

The Board Committees Governance and Procedures applies to the RNC subject to the following:

(a) Membership of the RNC

- The RNC must comprise:
  - RNC Chair: an independent non-executive Director; and
  - at least two other non-executive Directors and no executive Directors.
- Desirably RNC members may have some experience in human resources, remuneration and governance.
- The Managing Director may be invited to attend RNC meetings at the discretion of the RNC Chair, with other Senior Executives also generally being available as needed.

(b) Sensitive matters

- No executive should be involved in RNC decisions or deliberations about that executive's remuneration.
- The RNC should be alive to the potential for conflict of interest in Directors or executives being involved in the setting of remuneration for others that may indirectly affect their own remuneration (e.g. through setting benchmarks and because of relativities).

- When dealing with Board Chair succession, the Board Chair should not chair that meeting of the RNC while that matter is being deliberated upon.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-004	Yes

Health, Safety and Sustainability Committee – Committee Charter

1. Establishment

The Health, Safety and Sustainability Committee (**HSS Committee**) is established under the authority of the Board in accordance with the Company's Constitution and Corporate Governance Charter (**Corporate Governance Charter**). Capitalised terms used in this HSS Committee Charter which are not defined have the meanings given in the Corporate Governance Charter.

2. Remit

The remit of the HSS Committee is to oversee and act as a recommending, reviewing, monitoring and reporting forum of the Board in respect of the following matters:

- physical and psychosocial workplace health, safety and wellbeing;
- labour practices and human rights;
- community engagement including engagement with Traditional Owners and relationships with communities in which the Group operates;
- Cultural Heritage;
- integrity of the Group's supply chain, including responsible sourcing and Modern Slavery; and
- environmental stewardship including water resource management, biodiversity, waste and air quality, tailings facility management, land management and rehabilitation and climate change,

(collectively referred to in this Charter as "**HSS**").

3. Scope

The scope of the HSS Committee includes, but is not necessarily be limited to, the following matters.

(a) HSS Policies, procedures and systems

- reviewing and assessing the design and implementation of the Group's HSS governance processes, policies, procedures and systems (**HSS Policies**), which include:
  - Work Health, Safety and Wellbeing Policy;
  - Cultural Heritage and Communities Policy;
  - Environmental and Climate Change Policy;
  - Modern Slavery Policy;

- reviewing and monitoring the effectiveness of the HSS Policies in identifying and managing material HSS risks;
- monitoring compliance by the Group and its personnel with the HSS Policies, and reviewing any breaches and the response by management to such breaches;
- monitoring compliance by the Group with relevant legal and regulatory requirements in relation to HSS; and
- making recommendations to management and the Board on actions arising from its review and monitoring activities;

(b) HSS strategy and performance

- overseeing and making recommendations to the Board regarding the approval and integrity of public disclosures regarding HSS matters;
- reviewing HSS related strategies and projects proposed by management and providing recommendations to improve the Group's HSS performance;
- reviewing and making recommendations in relation to how HSS is considered in new projects and activities of the Group;
- supporting and overseeing the review of major HSS related incidents within the Group, as well as processes for responding to, and reporting on, incidents, risks and hazards in a timely manner and to provide appropriate recommendations to the Board;
- supporting independent investigations and appropriate consideration of HSS related matters reported by employees, contractors and/or other stakeholders, either directly or through the Company's whistleblower program;
- reviewing and making recommendations to ensure the Group has appropriate resources available to manage its HSS programs;

(c) HSS risk management

- assisting the Board's Audit and Risk Committee in reviewing HSS related risks, providing updates on significant changes in HSS risk exposures or potential liabilities or disclosure issues relating to HSS;
- reviewing how HSS risks are identified, assessed, managed and mitigated;
- advising the Board on the Group's risk appetite, tolerance and strategy on HSS;
- reviewing and approving any plans for HSS related internal/external audit and assurance programs; and

(d) Other

The HSS Committee may be requested by the Board to perform other related tasks or functions.

4. Governance

The Board Committees Governance and Procedures applies to the HSS Committee, subject to the following:

(a) Membership of the HSS Committee

- The HSS Committee must comprise:
  - Chair: an independent non-executive Director; and
  - at least two other members including at least one other non-executive Director.
- Collectively the HSS Committee members shall seek to have appropriate skills including:
  - HSS knowledge to allow them to discharge their duties and actively challenge information presented by management, consultants, advisors and auditors;
  - understanding of the Group's business (including technical aspects) and its HSS risks and controls to effectively discharge the Committee's mandate.
- The Managing Director, Chief Financial Officer and Chief Operating Officer will generally be available to attend HSS Committee meetings at the discretion of the Committee.

(b) Meeting frequency

The Committee shall meet at least two times per annum and at other times as the Committee Chair, a Committee member, or the Committee Secretary, requires.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-005	Yes

Greatland Values

Greatland's vision is to become a profitable multi-mine resources company by focusing on the responsible and sustainable discovery, development, extraction, processing and sale of precious and base metals.

Our **Greatland Values** are essential to achieving our vision. They guide the way we behave and the standards we set for ourselves and others.

Integrity: we are honest and act with integrity and respect

Safety: we operate with a focus on safety first to keep our workplace safe

Teamwork: we work as a team to achieve results

Accountability: we are accountable for our actions and build strong relationships through open communication

Responsibility: we perform to the best of our ability with a responsibility to our stakeholders and the environment

Results: we aim for the highest standards of performance and achievement in everything we do

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-007	Yes

Code of Conduct

1. Introduction, application and purpose

Greatland Resources Limited (**Greatland** or the **Company**) is committed to conducting its business lawfully, ethically and responsibly, in accordance with the Greatland Values and the principles and practices set out in this Code of Conduct (**Code**).

This Code has been approved by the Board of Directors of Greatland and is issued under Greatland's Corporate Governance Charter (**Charter**). The **Governance Policies** referred to in this Code are the policies and procedures attached to the Charter. This Code may be amended by the Board from time to time and will be published on the Company's website.

This Code applies equally to all Greatland Directors, officers, executives, employees, contractors, consultants and personnel generally (**Greatland Personnel**), across Greatland and its subsidiaries (the **Group**).

The Code is intended to guide and promote a culture of lawful, ethical and responsible behaviour throughout the Group and to encourage Greatland Personnel to act honestly, in good faith and in the best interests of Greatland at all times.

Greatland's stakeholders are entitled to expect the highest professional standards from Greatland Personnel. Good conduct by Greatland Personnel will contribute to enhancing Greatland's reputation and ensuring a sustainable business into the future.

2. Responsibilities

2.1 Directors

Greatland's Directors are responsible and accountable for:

- undertaking their duties and behaving in a manner that is consistent with the Greatland Values, the Charter, this Code and the Governance Policies; and
- fulfilling their obligations under applicable legislation, including their duties to:
  - act in good faith in the best interests of Greatland; and
  - use due care and diligence in exercising their powers and discharging their duties.

2.2 Senior Executives

Senior Executives (being the executives who report directly to the Managing Director) are responsible, and accountable to the Managing Director, for:

- effectively implementing, communicating, promoting and supporting the Greatland Values, this Code and the Governance Policies in their areas of responsibility;
- undertaking their duties and behaving in a manner that is consistent with the Greatland Values, this Code and the Greatland Policies;

- ensuring and monitoring that Greatland Personnel under their supervision act in accordance with the Greatland Values, this Code and the Greatland Policies; and
- in consultation with the Managing Director, responding to breaches of this Code and the Greatland Policies and implementing proportionate disciplinary action as required.

The Managing Director is responsible, and accountable to the Board, for ensuring that Senior Executives fulfil these responsibilities and for reporting to the Board (or the appropriate Board Committee) on breaches of this Code.

2.3 Greatland Personnel

All Greatland Personnel are responsible for:

- complying with the Governance Policies, in particular those referred to in this Code;
- undertaking their duties and behaving in a manner that is in the best interests of Greatland, and is consistent with the Greatland Values, this Code and the Governance Policies;
- reporting departures from this Code and the Governance Policies by themselves or others;
- operating within and always complying with all applicable laws and regulations;
- dealing fairly with all third parties with whom Greatland has business dealings, such as customers, suppliers and community members (**third parties**);
- disclosing and dealing appropriately with any conflicts between their personal interests and their duties or obligations as a Director, employee, or consultant (as applicable);
- not taking advantage of their position, or the property or information of Greatland or third parties, for personal gain or to cause detriment to Greatland or third parties;
- acting in a professional business-like manner when representing Greatland.

3. Corporate and business integrity

3.1 Anti-Bribery and Corruption

Greatland's commitment to conducting its business in a legal, honest, and ethical manner and with integrity is absolute. Greatland will not accept or tolerate any behaviour that is inconsistent with this commitment.

Greatland Personnel must not commit, or otherwise engage or be involved in any conduct associated with bribery and corruption.

Greatland Personnel must not accept any items of value (including gifts, meals and hospitality) except in accordance with the **Anti-Bribery and Corruption Policy**.

3.2 Competition

Greatland supports the principles of free and fair competition in the market in compliance with applicable competition and consumer protection laws.

3.3 Conflicts of interest

Greatland Personnel must ensure that they are not in a position where their personal interests are or could be in conflict with the interests of Greatland. Potential for conflict arises when it is likely that a Greatland Personnel member could be influenced, or perceived to be influenced, by a personal interest when carrying out their duties. Conflicts of interest that lead to biased decision-making may constitute corrupt conduct.

Some situations that may give rise to a conflict of interest include where the Greatland Personnel member has:

- financial interests in a matter Greatland deals with or the Greatland Personnel member is aware that their relatives, associates or friends have a financial interest in the matter;
- directorships or involvement in management of outside organisations;
- personal relationships with people that Greatland is dealing with which go beyond the level of a professional working relationship;
- secondary employment, business, commercial, or other activities outside of the workplace which impact on the Greatland Personnel member's duty and obligations to Greatland;
- access to information that can be used for personal gain; and
- offers of inducements.

The Greatland Personnel member may often be the only person aware of the potential for conflict. It is the responsibility of Greatland Personnel to avoid any conflict from arising that could compromise their ability to perform their duties impartially.

In the event that a member of Greatland Personnel has or becomes aware of an actual or perceived conflict between personal interests and the interests of Greatland, the Greatland Personnel member must immediately notify the Company Secretary. This is also the case where a member of Greatland Personnel is uncertain whether a conflict exists.

3.4 Confidentiality and privacy

Greatland Personnel may have access to or become aware of information which is commercially sensitive or confidential to Greatland.

Greatland Personnel must:

- make sure that all commercially sensitive or confidential information cannot be accessed by unauthorised persons or third parties; and
- not use or disclose any commercially sensitive information or confidential information other than in the proper performance of their duties or obligations to Greatland or as required by law.

It is considered a serious act of misconduct to deliberately release commercially sensitive or confidential documents or information to unauthorised persons or misuse such information. Such conduct may lead to disciplinary action.

Greatland commits to complying with laws in relation to privacy and the use of confidential or sensitive information. Further details are set out in the **Privacy Policy**.

3.5 Inside information and dealing in Company securities

Greatland Personnel may have access to or become aware of information which constitutes inside information for the purposes of applicable securities laws and regulations.

Greatland Personnel are prohibited by law from trading (or procuring any other person to trade) in the Company's securities if they possess inside information.

Greatland Personnel must only deal in Company securities in accordance with the **Securities Dealing Policy**.

3.6 Legal and regulatory compliance

It is essential that all Greatland Personnel comply with all applicable laws and regulations of the countries in which Greatland operates. Violations of such laws or regulations may have serious consequences for Greatland and any individuals concerned.

Any known or suspected violation must be reported immediately to the relevant line manager, the Company Secretary, the Managing Director or the Chair of the Board (as appropriate) or, where the person is not comfortable doing so, in accordance with the Speak Up Policy (see Section 3.8 below).

3.7 Political involvement

Greatland does not participate in or comment on general political matters. This does not restrict Greatland from appropriately commenting on, or advocating or supporting, policies which are relevant to the Greatland's interests, which policies may have political implications.

Donations, whether in cash or kind, in support of any political parties or candidates must not be made without the prior consent of the Board of Directors.

3.8 Whistleblowing

Greatland is committed to fostering an environment where concerns about illegal or unethical behaviour which affect Greatland can be reported in the confidence and without fear of retribution. Greatland will treat reports of this kind to the designated officer (if any) for such purpose (or in the absence of a designated officer, the Company Secretary or the Managing Director) seriously and investigate and act on them appropriately and promptly.

Further details are set out in the **Speak Up Policy**.

4. Health, safety and wellbeing

Greatland believes that a healthy and safe workforce is an essential contributor to business success and is committed to the health, safety, and wellbeing of Greatland Personnel, contractors, visitors, and community members.

Greatland is responsible for taking all appropriate measures to provide a safe workplace and system of work for all Greatland Personnel, contractors and visitors.

Greatland Personnel are personally responsibility for their own safety and the safety of those around them. Acceptance by Greatland Personnel of their responsibility is a fundamental term of their employment or engagement by the Group.

Further details are set out in the **Workplace Health, Safety and Wellbeing Policy**.

5. Environment

Greatland is committed to operating in an environmentally responsible manner and managing the impacts its activities have on the environment.

Compliance with all relevant environmental laws and obligations is the absolute minimum standard to which Greatland complies.

Greatland Personnel must comply with the **Environmental and Climate Change Policy**.

6. Cultural Heritage and Community

Many of Greatland's operations are on or near land that is significant to many, including Aboriginal people. We recognise the cultural, spiritual and physical connections that Aboriginal people have with their land and surrounding environment.

In areas that Greatland operates, we are committed to:

- understanding, respecting and responsibly managing Aboriginal cultural heritage; and
- co-operating and forming positive relationships with Traditional Owners and Aboriginal communities.

Greatland Personnel must take personal responsibility for meeting these commitments.

Further details are set out in the **Cultural Heritage and Communities Policy**.

7. Employment practices

7.1 Compensation, benefits and hours

Greatland will comply with applicable legislation relating to minimum wages, benefits and working hours.

7.2 Diversity and discrimination

Greatland recognises the importance and benefits of diversity and inclusion to our business, and is committed to creating a workplace culture that encourages and promotes diversity.

Greatland is committed to provide a fair and inclusive workplace:

- where everyone feels respected;
- where everyone has equal access to employment and its benefits based on merits; and
- that does not condone or tolerate inappropriate conduct.

Greatland Personnel must not harass, discriminate against, bully, or victimise any colleagues or members of the public or support others in doing so. This includes at work-related functions, through the use of work-related resources and technology, in work-related accommodation, online or via social media platforms or during work-related travel.

Greatland will not tolerate any discrimination, whether on the grounds of gender, race, ethnic or social origin, cultural or socio-economic background, sexual orientation, religious beliefs, political opinions, education, family responsibilities, marital or family status, gender identity, pregnancy, physical or mental disability, trade union membership, non-membership or lawful union activity.

Further details are set out in the **Diversity and Inclusion Policy**.

7.3 Freedom of association

Greatland recognises the right of workers to form and join trade unions and to be involved in lawful union activity.

7.4 Human Rights

Greatland is committed to respecting and supporting the human rights of all people including our employees, the communities in which we operate and those who may be impacted by our activities.

Further details are set out in the **Human Rights Policy**.

8. Communications

Individuals have a right to give their opinions on political and social issues in their private capacity, however, the only persons authorised to make public statements or comments on behalf of, or that will be attributed to, Greatland are the:

- Chair of the Greatland Board;
- Deputy Chair of the Greatland Board;
- Managing Director;
- Chief Financial Officer; and
- Head of Business Development,

or their appropriately authorised delegate.

Further detail is set out in the **Communications and Social Media Policy** and **Continuous Disclosure Policy**.

9. Intellectual property

Greatland is the owner of intellectual property created by employees in the course of their employment. Greatland will also own or have the right to use intellectual property created by its consultants and contractors.

Greatland Personnel must protect the intellectual property that Greatland owns or has the right to use and must only use such intellectual property to the extent required to perform their duties or obligations to Greatland or otherwise with the prior written permission from the Company Secretary.

10. Use of Greatland resources

Greatland Personnel are responsible for safeguarding any Greatland resources which are under their control. This may include Greatland funds, property, equipment, technology and information. These resources must not be used for personal benefit, and Directors and employees must take appropriate precautions to prevent theft, damage, or misuse of Greatland property.

Requests to use Greatland's resources outside core business times, other than at a Greatland office or site, or for purposes other than Greatland business, should be referred to an individual's manager or the Managing Director for approval. Greatland Personnel using Greatland resources for purposes other than Greatland business without obtaining prior approval could face disciplinary action.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-008	Yes

Anti-Bribery and Corruption Policy

1. Introduction, purpose and application

Greatland Resources Limited (**Greatland** or the **Company**) is committed to complying with all of its legal obligations and acting ethically and in accordance with its Code of Conduct and Statement of Values in all places where it operates or does business.

There are many laws and regulations around the world dealing with the issues of Bribery and Corruption (defined in Section 3) and similar problematic conduct. Breaches of these laws and regulations can attract very serious consequences, including (but not limited) criminal and civil liability for the Company and individuals involved, and significant reputational damage.

This Anti-Bribery and Corruption Policy (**Policy**):

- sets out the Company's position on matters relating to Bribery and Corruption and similar problematic conduct, and the responsibilities of those to whom this Policy applies;
- provides guidance on how you can help to recognise and deal with such conduct; and
- establishes controls to ensure compliance with applicable anti-Bribery and Corruption laws and regulations, and to ensure that Greatland's business is conducted in a lawful, socially responsible and ethical manner.

This Policy applies to all employees (whether permanent, fixed-term or temporary), directors, officers, consultants, representatives, secondees and contractors of Greatland (**Relevant Persons**).

2. Policy statement

Greatland has a zero-tolerance approach to Bribery and Corruption and is committed to:

- acting professionally, fairly and with integrity in all business dealings and relationships;
- not permitting inappropriate promises, gifts or excessive hospitality given to Government Officials in order to achieve unfair advantage or benefit; and
- resisting any efforts made by others (including suppliers, customers or other third parties) to unfairly affect any official decision-making process in order to achieve unfair advantage or benefit.

Relevant Persons must, at all times, act in accordance with these principles.

Greatland encourages charitable donations and sponsorships only when they are ethical and legal under relevant laws and practices. Greatland does not encourage contributions to political parties. Greatland strictly prohibits Money Laundering and Terrorism Financing and does not condone Facilitation Payments (defined in Section 3) as a means of doing business. Greatland expects its suppliers, customers and other business partners to implement and enforce effective systems to counter Bribery. Greatland will always document and report to appropriate authorities a breach of the Bribery and Corruption law that is brought to its attention.

3. Definitions

Bribery: means the unlawful giving, offering to give, attempting to give, or authorising the offer of, any Item of Value that may influence, or appear to influence, a discretionary decision of any person (including a decision to not do something or to not act) or otherwise induce any person to behave in an illegal or unethical manner or provide a commercial or personal advantage.

Corruption means the abuse of a position of power, by Government Officials or private individuals, to obtain an improper financial advantage to personally enrich themselves and potentially also co-conspirators. Corruption may extend to criminal conduct such as Bribery, fraud, or embezzlement, in either the public or private sectors.

Facilitation Payments: means payments (often small) made to Government Officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary licence or business permit, processing government papers such as visas, providing police protection, providing telephone, power or water service, or loading or unloading of cargo.

Government Official: should be interpreted broadly and includes (but is not limited to) any person, regardless of rank or title, who is:

- an official or employee of a government or government owned or controlled enterprise;
- an official or employee of a government agency or regulatory authority, including customs, immigration, mines and energy, environment and taxation authorities;
- an official or employee of a political party or a political candidate;
- an official or employee of an international public organisation such as the United Nations, World Bank or International Monetary Fund;
- a member of the judiciary or magistracy;
- an individual who holds or performs the duties of an appointment, office or position created by custom or convention;
- a person who is, or holds themselves out to be, an authorised intermediary of a government official; or
- a relative (such as a spouse, partner, parent, child or sibling) or associate (e.g. companies or trusts in which such person such persons hold an interest) of such Government Official.

Item of Value: includes (but is not limited to) travel, meals, gifts, gratuities, events, hospitality, and other tangible or intangible benefits.

Money Laundering: involves disguising the source of illegally obtained funds to make them appear legitimate.

Terrorism Financing: involves using legitimate or illicit funds to support terrorist activities.

4. Bribery

Relevant Persons must not engage in any form of Bribery, either directly or through any third party (such as an agent or distributor). Specifically, you must not give, offer, promise, accept, request or authorise any form of Bribery anywhere in the world, whether directly or indirectly.

5. Gifts and hospitality

Relevant Persons must **not offer or give**, directly or indirectly, any Item of Value:

- which could be regarded as illegal or improper, or which violates the recipient's policies;
- to any Government Official(s); or
- which exceeds A$500 in value for each individual Item of Value or A$1,000 in aggregate in any financial year for Items of Value offered or given to any particular recipient, unless approved in writing by the Company Secretary or Managing Director.

Relevant Persons must **not accept** any Item of Value from suppliers, business partners or other third parties connected to Greatland if:

- it exceeds A$1,000 in value for each individual Item of Value or A$3,000 in aggregate in any financial year for Items of Value accepted by a Relevant Person from any particular giver, unless approved in writing by the Company Secretary or Managing Director; or
- there is any suggestion that a return favour will be expected or implied.

Where a written approval is required pursuant to the above, Relevant Persons must submit a request by email to the Company Secretary.

Where a written approval is required because the threshold is exceeded, if it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the Company Secretary and donated to charity. The Company Secretary will maintain a register of approvals and gifts declared under this Policy.

Greatland acknowledges that the practice of giving business gifts varies between countries and regions, and that what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and lawful. The intention behind the gift should always be considered. Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards.

The following circumstances, however, are never acceptable and will not be approved anywhere in the world:

- offering any Item of Value in the form of cash or cash equivalent vouchers or gift cards;
- "quid pro quo" (a benefit or advantage offered for something in return); or
- making incomplete, false or inaccurate records in the books and records of the Company (e.g. concealing the type of payment made or falsifying the amount).

6. Facilitation payments

Facilitation Payments tend to be demanded by low level officials to obtain a level of service to which one would normally be entitled. Facilitation Payments must not be paid anywhere in the world.

Greatland acknowledges, however, that Relevant Persons may be faced with situations where there is a risk to the personal security, health or safety of that Relevant Person or other persons

and where a payment is unavoidable, in which case the payment will not be regarded as a Facilitation Payment provided that the following steps are taken:

- keep any amount to the minimum;
- create a record concerning the payment; and
- report it to the Company Secretary immediately.

The Company Secretary will maintain a record of all such payments reported to it, which will be reported to the Audit and Risk Committee (or directly to the Board) in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

7. Political contributions

Donations, whether in cash or kind, in support of any political parties or candidates must not be made without the prior consent of the Board of Directors.

8. Charitable donations

Charitable support and donations are acceptable, whether of in-kind services, knowledge, time, or direct financial contributions. Relevant Persons must take care to ensure that charitable contributions are not used as a scheme to conceal Bribery. Greatland only makes charitable donations that are legal and ethical under local laws and practices. No donation may be offered or made without the prior approval of the Company Secretary and following this approval remains subject to the Company's Delegated Authority Policy. All charitable contributions should be publicly disclosed.

9. Your responsibilities

The prevention, detection and reporting of Bribery and other forms of Corruption is the responsibility of all of us; including you and those working for you or under your direction.

You must:

- ensure that you read, understand and comply with this Policy at all times while you are a Relevant Person;
- avoid any activity that might lead to, or suggest, a breach of this Policy;
- ensure the effectiveness of the Company's record keeping by:
  - keeping your own written record of any Item of Value offered, given, received or accepted (irrespective of value);
  - submitting a request by email to the Company Secretary in respect of any Item of Value for which approval is required pursuant to Section 5 of this Policy;
  - ensuring that all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with Greatland's expenses Policy and specifically record the reason for the expenditure;
  - ensuring that all accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts,

are prepared and maintained with accuracy and completeness, and that no accounts may be kept "off-book", to avoid facilitating or concealing improper payments;

- seek clarification from the Company Secretary if you have any doubts, concerns or suspicions about matters dealt with by this Policy (Greatland encouraged openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken); and
- report as soon as possible to the Company Secretary (preferably in the first instance), or to the Managing Director, Chair of the Audit and Risk Committee, or Chair of the Board of Directors if:
  - you become aware, or believe or suspect, that any Bribery or Corruption or breach of this Policy has occurred or may occur in the future; or
  - you are offered any Item of Value by a third party in exchange for providing them with a reciprocal benefit, exercising a discretion in their favour, or otherwise behaving in an unlawful or unethical manner, are asked to engage in Bribery, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Any Relevant Person who breaches this Policy will face disciplinary action which, for employees, could result in dismissal.

Greatland reserves its right to terminate our contractual relationship with any Relevant Person if they breach this Policy.

10. Common red flags

Some common Bribery and Corruption red flags you should be alert to when working with suppliers, business partners and other third parties include:

- vaguely described services and deliverables;
- lack of experience in your sector, or you and the other party are in different lines of business;
- transacting with or through a shell company;
- part of the transaction is at the request of the Government Official;
- large commissions (that may be used as ‘slush funds’ to bribe Government Officials);
- unexpectedly or unreasonably high expenses;
- upfront fees;
- urgent payments;
- cash payments;
- payments in multiple smaller amounts;
- payments to personal accounts, offshore accounts or trusts.

11. Communication

Greatland is committed to its personnel fully understanding this Policy and how it is to be used.

The Company will provide this Policy (including as updated) as part of induction of new Relevant Persons and will provide updates to existing Relevant Persons.

12. Compliance with local laws

If any local laws, regulations, codes of conduct or orders where you are doing business impose additional obligations or are more restrictive than this Policy, then you must comply with those additional obligations or restrictions in addition to complying with this Policy.

13. Responsibility for this Policy

Greatland's Board of Directors has overall responsibility for this Policy.

The Company Secretary has primary and day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Any material breaches of this Policy will be reported to the Board of Directors.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

14. Monitoring and review

The Board of Directors will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness.

All Relevant Persons are responsible for the successful implementation of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This Policy may be amended at any time by approval of the Board of Directors.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-009	Yes

Communications Policy

1. Policy statement

Greatland Resources Limited (**Greatland** or the **Company**) seeks to communicate with its shareholders, security holders and other stakeholders (subject to commercial and legal confidentiality restraints, including privacy laws) in an appropriate and effective manner.

Greatland is an Australian public company listed on the Australian Securities Exchange (**ASX**) whose shares are also admitted to trading on the London Stock Exchange (**LSE**)'s AIM Market (**AIM**), and is therefore subject to the ASX Listing Rules, the AIM Rules and the UK Market Abuse Regulation.

This Policy sets out:

- information that will be communicated through the Company's website;
- who is responsible and authorised to communicate on behalf of Greatland; and
- rules regarding the use of social media that apply to all employees, officers, Directors, contractors, consultants and personnel generally of Greatland and its subsidiaries (**Greatland Personnel**).

This Policy applies alongside the Company's Continuous Disclosure Policy.

2. Greatland's website

Greatland will use the Company's website, www.greatlandresources.com, to provide information about the Company and to complement the official release of material information to the ASX and AIM markets, so as to enable broader access to information by investors and stakeholders.

The Company's website will include relevant information on the following topics:

- corporate, business and project information;
- corporate governance, including corporate governance statements and relevant charters and policies;
- directors and senior management;
- announcements made by the Company on the ASX's market announcements platform and through the LSE's Regulatory News Service (**RNS**);
- annual, half-year and quarterly reports;
- notices and results of general meetings; and
- presentations.

3. Responsibility and authority for communications

The only persons authorised to publish or make public statements or comments on behalf of, or that will be attributed to, Greatland are the:

- Chair of the Greatland Board;
- Deputy Chair of the Greatland Board;
- Managing Director;
- Chief Financial Officer; and
- Head of Business Development,

(**Authorised Spokespersons**).

Greatland Personnel must not release or publish any non-public information (that is, information which is not already publicly available), or make official or public comment on matters relating to Greatland, unless they are:

- authorised to do so by an Authorised Spokesperson;
- giving evidence in court; or
- otherwise required to by law.

4. Social media

4.1 *AIM requirements regarding social media*

The AIM Rules include strict requirements regarding the use of social media.

In particular, AIM Rule 10 requires that any information required to be published by the AIM Rules, including unpublished price sensitive information, must be published through a Regulatory Information Service (which for Greatland is the RNS) no later than it is published elsewhere.

It is the responsibility of all Greatland Personnel to ensure that information which is required to be released through the RNS is not published on any social media accounts in advance of that happening. For more information, Inside AIM's article titled "Interaction of social media with disclosure obligations under the AIM Rules", is available to read at the following link: https://docs.londonstockexchange.com/sites/default/files/documents/social-media.pdf.

If there is uncertainty with respect to the application of the AIM Rules, Greatland is required to consult its AIM Nominated Adviser about how information is disseminated to ensure compliance with the AIM Rules.

4.2 *Application and responsibility*

This Policy applies to all use of social media by Greatland Personnel, irrespective of whether it is through official accounts of Greatland or through personal accounts. Greatland Personnel

should be aware that their use of social media may be monitored and action may be taken in respect of any breaches of this Policy.

Questions regarding the content or application of this Policy should be directed to the Company Secretary.

4.3 *Greatland social media accounts*

Greatland's official social media accounts may only be operated (i.e. updated or communicated through) by the Managing Director, Chief Financial Officer, Head of Business Development or their authorised internal or external delegate (including third party advisors).

4.4 *Greatland Personnel's personal social media accounts*

Only the Chairman, Deputy Chair, Managing Director, Chief Financial Officer and Head of Business Development are authorised to use their personal social media accounts in respect of Greatland's activities.

Greatland Personnel are responsible for any content that they publish on social media platforms. When using your own social media you should:

- never disclose non-public, commercially sensitive, anti-competitive, private or confidential information relating to Greatland, its business and activities, or your employment; and
- not make any statement on behalf of (or which could be interpreted as being on behalf of) Greatland; and
- exercise caution and good judgment in making any statements which relate to (or which could be interpreted as relating to) Greatland, its business and activities, or your employment.

There may be occasions when you wish to share, like or engage with Greatland social media content through your personal account, or use your personal account to link to information on Greatland. This is permitted to the extent it complies with this Policy.

On social media, the lines between public and private, and personal and professional, may be obscure. If you are identifiable as Greatland Personnel through your social media, you are creating perceptions about your expertise with respect to Greatland and its activities, and are therefore responsible for ensuring that your content and communications is professional and consistent with the Greatland Values and the Greatland Governance Policies.

If you are in any doubt as to whether particular social media activity is appropriate or acceptable, you should consult with the Company Secretary or Managing Director before such activity.

5. Breaches

Any breach or potential breach of this Policy should be reported to the Company Secretary.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-010	Yes

Continuous Disclosure Policy

1. Policy statement

Greatland Resources Limited (**Greatland** or the **Company**) is an Australian public company listed on the Australian Securities Exchange (**ASX**) whose shares are also admitted to trading on the London Stock Exchange (**LSE**)'s AIM Market (**AIM**).

Greatland is committed to:

- complying with the disclosure requirements of the *Corporations Act 2001* (Cth) (**Corporations Act**), the Listing Rules of the Australian Securities Exchange (**ASX Listing Rules**), the United Kingdom's Market Abuse Regulation (**UK MAR**) and the AIM Rules for Companies (**AIM Rules**) and other applicable laws and regulations;
- preventing the selective or inadvertent disclosure of material market sensitive information; and
- ensuring that its shareholders, security holders and the market:
  - are provided with material information regarding Greatland in a timely, appropriate, accurate and effective manner; and
  - have equal opportunity to receive information released publicly by Greatland.

This Policy applies to all Greatland directors and employees, as well as contractors and consultants to Greatland with access to Price Sensitive Information (defined below), who are expected to familiarise themselves and comply with the requirements of this Policy.

2. Price Sensitive Information

The ASX Listing Rules, AIM Rules and UK MAR each contain continuous disclosure requirements, which correlate to a significant extent in their intent and effect. This Policy seeks to address these requirements collectively.

Any information which may be price sensitive or inside information under one or more of these regimes must be considered separately for the purposes of each, with the assistance where appropriate of the Company's legal advisors and its Nominated Advisor for the purposes of the AIM Rules (**Nominated Advisor**).

For the purposes of this Policy, the test for determining whether information may constitute price sensitive information and/or inside information for the purposes of the ASX Listing Rules, AIM Rules and/or UK MAR (as applicable) is whether:

- a reasonable person would expect the information to be likely to have a material or significant effect on the price or value of Greatland's securities; and/or
- the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of Greatland securities,

("**Price Sensitive Information**" for the purposes of this Policy).

For example, Price Sensitive Information may include information about:

- material changes in financial position or performance, projected or expected financial position or performance, or the availability of financing;
- acquisitions, divestments, or other corporate transactions;
- entry into, or variation, breach or termination of, a material agreement;
- significant developments in new or existing projects or ventures;
- developments in Greatland's sphere of activity which might have a material impact on Greatland;
- material litigation (including pending or threatened litigation) against Greatland or its subsidiaries;
- decisions on significant issues affecting Greatland by relevant government agencies and regulatory bodies in the United Kingdom, Australia or elsewhere;
- exploration and drilling results; and
- material changes or developments in the operational performance of Greatland's projects or expectations of such performance.

This list is not exhaustive and there are many other potential examples of Price Sensitive Information. An intermediate step in a protracted process can also be Price Sensitive Information where it meets the requirements. Each piece of information must be assessed separately, and good and bad news cannot be 'offset' against one another.

If there is any doubt as to whether information is Price Sensitive Information, then it should be referred to the Disclosure Committee.

3. Continuous disclosure and exemptions

The principle of this Policy is that the "highest standard" of disclosure applies and that any announcement made on ASX should also be made simultaneously, to the extent practicable given the time difference, to the public via the Regulatory News Service (**RNS**) of the LSE, and vice versa.

The Company will as soon as possible notify ASX and the public via RNS of any Price Sensitive Information, unless exempted by all of the ASX Listing Rules, AIM Rules and UK MAR.

Where the Company becomes aware of Price Sensitive Information outside of the operating hours of the ASX, but is required to release the information to AIM under the AIM Rules and UK MAR, Greatland will provide the information to the ASX market announcement office at the same time as releasing the information on AIM, together with advice that it has been released on AIM.

In practice the Company will only be exempted from immediate disclosure of Price Sensitive information where ***all*** of the following criteria[1] are satisfied:

ASX criteria

(a) a reasonable person would not expect the information to be disclosed;

(b) the information is confidential, the ASX has not formed the view that the information has ceased to be confidential;

(c) one or more of the following applies:

- it would be a breach of the law to disclose the information;
- the information concerns an incomplete proposal or negotiation;
- the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
- the information is generated for the internal management purposes of the Company;
- the information is a trade secret;

UK MAR criteria

(d) immediate disclosure is likely to prejudice the legitimate interests of the Company;[2]

(e) delay of disclosure is not likely to mislead the public;[2]

(f) the Company is able to ensure the confidentiality of the information;

AIM criteria

(g) it is an impending development or a matter in the course of negotiation and the Company has effective procedures and controls in place to keep the information confidential; and

(h) the information is only disclosed to the following recipients prior to being made public, who the Company is satisfied are bound by a duty of confidentiality and aware that they must not trade in the Company's securities before the information is disclosed to the public:

- advisors of the Company or of other persons involved in the development or matter;

[1] Criteria (a), (b) and (c) are from ASX Listing Rule 3.1A; criteria (d), (e) and (f) are from Article 17(4) of the UK MAR, and criteria (g) and (h) reflect the Guidance Notes to AIM Rule 11.

[2] UK Financial Conduct Authority and European Securities and Markets Authority guidance provides examples of:

- legitimate interests likely to be prejudiced by immediate public disclosure of inside information:
  - the Company is conducting negotiations, or planning to buy or sell a major holding in another entity, and the negotiation or plan would likely be jeopardised by public disclosure;
  - the financial viability of the Company is endangered, although not within the scope of the applicable insolvency law, and immediate public disclosure of the inside information would seriously prejudice the interests of shareholders by jeopardising negotiations designed to ensure financial recovery of the Company;
- situations where delay of disclosure of inside information is likely to mislead the public:
  - the information is materially different from previous announcements on the same matter;
  - the information is that previously announced financial objectives (e.g. forecasts) are not likely to be met;
  - the information is in contrast with the market's expectations, where such expectations are based on signals that the Company has previously communicated to the market, including through interviews, roadshows or other communications organised by the Company or with its approval.

- persons with whom the Company is negotiating, or intends to negotiate, any commercial, financial or investment transaction;
- representatives of its employees acting on their behalf;
- any government department or statutory or regulatory body or authority; and
- the Company's lenders.

When the Company is relying on an exemption or is involved in a development that may eventually require reliance on an exemption, strict confidentiality must be adhered to. All Company personnel (including consultants and contractors) are required to maintain confidentiality of the Company's information and to provide the Company on request with any details required to be included on any insider list maintained by the Company to record who has had access to inside information and when they had access.

Where the Company decides to delay disclosure in reliance on an exemption it must keep a record including when the decision was made and when the information became inside information, and notify the UK Financial Conduct Authority (**FCA**) immediately (and within one business day) when the information is ultimately announced.

4. Disclosure Committee responsibilities and decision-making

The Board has ultimate responsibility for ensuring the Company complies with its continuous disclosure obligations.

Greatland has established a **Disclosure Committee**, comprising the following members (or their delegates):

- Managing Director;
- Head of Business Development; and
- General Counsel.

The Board has delegated to the Disclosure Committee responsibility for the effective implementation of this Policy, including:

- ensuring that Greatland complies with its disclosure obligations under the Corporations Act, ASX Listing Rules, UK MAR and AIM Rules;
- deciding whether information is considered Price Sensitive Information and, if it is:
  - determining whether any exemption(s) to immediate disclosure apply and will be relied on, and if they are then ensuring compliance with any conditions to such exemptions; and
  - approving the form of any announcement of disclosable Price Sensitive Information;
- obtaining advice from the Company's legal advisors and Nominated Advisor as appropriate;
- seeking to ensure that Greatland's announcements are not misleading, false or deceptive and does not omit anything likely to affect the import of the information, and are accurate, balanced and expressed in a clear and objective manner that allows investors to assess the impact of the information when making investment decisions;

- overseeing and co-ordinating disclosure of information to ASX and to the public via RNS, and to investors and shareholders through other Company communications; and
- providing guidance to Directors and employees on disclosure requirements and procedures.

To the extent practicable, all members of the Disclosure Committee will be given the opportunity to review and comment on material announcements prior to their release, having regard to a member's area of expertise.

Unless expressly stated otherwise, any two members of the Disclosure Committee may jointly make a decision, or provide an approval, on behalf of the Disclosure Committee for the purposes of this Policy.

In exceptional circumstances, where only one member of the Disclosure Committee is available within the prescribed timeframe for making a disclosure, then that member and to the extent practicable, one of the Chair or Deputy Chair of the Board may jointly make a decision, or provide an approval, on behalf of the Disclosure Committee for the purposes of this Policy.

5. Other roles and responsibilities

While the Disclosure Committee is responsible for the effective implementation of this Policy, it is to be assisted by the following persons:

- **All employees and Directors**, as well as contractors and consultants with access to Price Sensitive Information, in:
  - promptly reporting any non-public information that they become aware of which they believe may be Price Sensitive Information to the Disclosure Committee;
  - promptly reporting any unusual market activity or rumour or speculation that they become aware of to the Disclosure Committee for it to assess whether there may be a false market in the Company's securities and associated disclosure considerations; and
  - complying with the Company's Communications and Social Media Policy.
- **Management** in preparing, reviewing and verifying announcements within their areas of expertise, in accordance with the Company's Announcements Release Standard and/or as requested by the Disclosure Committee.
- The **Board of Directors** in, where practicable, reviewing and approving significant announcements and communications. It is acknowledged however that where a continuous disclosure obligation arises, disclosure cannot be delayed due to the unavailability of Directors.
- The **Head of Business Development** who is responsible for:
  - administration of this Policy generally;
  - reviewing draft announcements;
  - consulting with appropriate members of the Board, management and external advisers (including the Nominated Advisor) on announcements as necessary;
  - obtaining necessary approvals in relation to announcements; and

- releasing or giving final approval for the release of announcements to ASX and AIM.

- The **Company Secretary** who is responsible for:
  - communications with ASX, AIM, ASIC, the FCA and any regulatory bodies regarding the Company's disclosures;
  - keeping a record of any decisions by the Disclosure Committee to delay the release of an announcement in reliance on the exemptions outlined in Section 3; and
  - keeping a record of all ASX, AIM and other announcements made by the Company,

  in accordance with the Disclosure Committee Charter, this Policy and the Company's Announcements Release Standard.

6. Authorised Spokespersons

The only persons authorised to publish or make public statements or comments on behalf of, or that will be attributed to, Greatland are the:

- Chair of the Board;
- Deputy Chair of the Board;
- Managing Director;
- Chief Financial Officer; and
- Head of Business Development,

(**Authorised Spokespersons**).

The Disclosure Committee may also authorise others to act as an Authorised Spokesperson in respect of specified information or activities, or at particular briefings (as defined in Section 8).

When communicating with external parties, Authorised Spokespersons must comply with Section 8.

7. Investor and analyst briefings

As part of the Company's investor relations program, and to enhance analysts' understanding of its business and assets, it conducts briefings with investors or analysts from time to time, which may include:

- group briefings, presentations or conference calls;
- one-on-one discussions or communications (for the purpose of this Policy, this includes any communications between the Company and an analyst or investor); and
- presentations at conferences, panels and other events,

by Authorised Spokespersons (collectively referred to in this Policy as **briefings**).

The Company will not disclose or discuss at briefings any information which is, or potentially could be, Price Sensitive Information, that has not already been announced to ASX and to the public via RNS.

In addition, the following protocols will be followed:

- **Advance notice of group briefings**: where practicable and appropriate, the Company will endeavour to provide advance notification of group briefings and to make them accessible to shareholders and investors.
- **Pre-results period**: to prevent inadvertent disclosure of Price Sensitive Information, during the periods between the end of its financial reporting periods and the actual results release, the Company will not discuss any financial information or broker estimates or forecasts with investors, analysts or the media, unless the information being discussed has previously been disclosed to ASX and to the public via RNS.
- **Announcement of presentations**: a copy of any new and substantive investor or analyst presentation materials will be announced prior the presentation and published on Greatland's website (noting that the inclusion of information in such a presentation on the website does not relieve the Company of its obligation to announce any Price Sensitive Information which is Disclosable Information).
- **Review of materials**: any substantive written materials to be used at a briefing must be provided in advance to the Disclosure Committee to determine whether it contains any Price Sensitive Information that has not previously been disclosed.
- Attendance, records and review of briefings:
  - two Company representatives should be present at the briefing wherever practicable;
  - if only one Company representative attends a briefing, the briefing should where possible, be recorded. Where recording is not possible, the representative attending must make an immediate note of the content of the briefing and provide it to the Head of Business Development within one day of the briefing taking place;
  - scripted answers should be prepared to questions likely to be asked;
  - a file note should be made in relation to the briefing and be kept for a reasonable period after the briefing;
  - if a question raised during the briefing can only be answered by disclosing Price Sensitive Information which has not previously been disclosed to ASX and to the public via RNS, the Company representative must decline to answer the question, but take the question on notice; and
  - Company representatives participating at a briefing should conduct a post-briefing review on the same day to identify whether any non-public information was disclosed. If a representative present at a briefing considers that any non-public Price Sensitive Information may have been disclosed during the briefing, they must immediately notify the Disclosure Committee.

8. Analyst reports and forecasts

Research analysts frequently prepare reports on listed entities, including the Company, which may contain forecasts and valuations. The Company acknowledges the importance of analyst reports in facilitating the operation of the market in an informed and efficient manner.

However, the Company is independent, and will do all things necessary to be seen as independent, to analysts. The Company will not endorse any such reports and will restrict its comments to factual matters and information which has previously been announced.

In particular, the Company:

- will not generally comment on analyst forecasts or disclose its own earnings projections; however, it may comment on analyst reports by:
  - acknowledging the report's range of estimates; or
  - correcting significant factual errors or assumptions where relevant information has previously been disclosed and/or may lead to widespread and serious misunderstanding in the market;
- will not include any analyst reports in its own corporate information, or post any analyst reports (including hyperlinks) on its website, but may use the reports internally; and
- will include a disclaimer that the Company is not responsible for, and does not endorse, the analyst report, in any response made to an analyst.

If a draft report has been sent to the Company for comments, it should be forwarded immediately to the Disclosure Committee.

9. Media, social media and market speculation

The Company has a general "no comments" policy in relation to media and market speculation and rumours, which must be observed by employees and Directors at all times.

However, the Company may issue an announcement in response to media or market speculation or rumour where it is necessary to comply with its continuous disclosure obligations, for example: for the purpose of correcting factual errors; responding to a formal request from ASX, AIM, ASIC or the FCA for information; or where the Company becomes aware of accurate public speculation about Price Sensitive Information.

The Company will not provide the media with exclusive interviews on a non-embargoed basis or information that potentially contains any Price Sensitive Information prior to announcing that information. It will also not provide any information “off the record”.

Employees who are approached by the media or any external parties for information should observe the “no comments” policy and notify the Disclosure Committee as soon as possible.

10. Trading halts

In certain circumstances, the Company may need to request a trading halt from ASX or a suspension from trading on AIM to maintain the efficient trading of its securities (noting that it is unlikely that a trading halt or suspension will be granted on AIM).

The Disclosure Committee will make all decisions in relation to trading halts and are the only personnel authorised to request or delegate the requesting of a trading halt on behalf of the Company.

A trading halt or suspension on one market will not relieve the Company of its obligations to notify Price Sensitive Information.

11. Inadvertent disclosure

If Price Sensitive Information is inadvertently disclosed or a Greatland employee or Director becomes aware that there may have been inadvertent disclosure of Price Sensitive Information, this must be immediately referred to the Disclosure Committee so that appropriate action can be taken including, if required, announcing the information via a market release.

12. Breaches of this Policy

The Company takes continuous disclosure very seriously. Non-compliance with continuous disclosure obligations may constitute a breach of the Corporations Act, ASX Listing Rules, AIM Rules, UK MAR and potentially other laws and regulations. This may result in fines for the Company, potential criminal and civil liabilities for Directors and other officers, and damage to the Company's reputation.

Accordingly, Breaches of this Policy may result in disciplinary action against the employee including dismissal in serious cases.

13. Review of this Policy

This Policy will be reviewed annually to assess whether it continues to meet its purpose and objectives and to ensure alignment which changes or updates to applicable laws, regulations and guidance.

Any amendment to this Policy requires the approval of the Board.

Material changes to this Policy will be promptly notified to the ASX and AIM and a copy of the updated Policy will be available on the Company's website.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-011	Yes

Cultural Heritage and Communities Policy

1. Policy statement

Greatland Resources Limited (**Greatland** or the **Company**) conducts operations that may be on or near land that is significant to Traditional Owners. We recognise the cultural, spiritual and physical connections that Aboriginal people have with their land and surrounding environment.

In areas that Greatland operates, we are committed to:

- understanding, respecting and responsibly managing our impacts on Aboriginal cultural heritage; and
- co-operating and forming positive relationships with Aboriginal communities.

2. Strategies to achieve Policy objectives

at sites and operations that Greatland controls we will seek to:

- comply with all laws, statutory regulations, and standards with regards to cultural heritage;
- engage with the relevant Traditional Owners and other local stakeholders or communities of interest in the areas we operate (**Community Stakeholders**);
- openly and honestly engage with our Community Stakeholders on an ongoing basis to ensure cultural heritage issues are understood and activities are managed in an appropriate manner;
- identify, assess, and manage the impact that our activities have on Community Stakeholders, by:
  - planning and consulting with Community Stakeholders;
  - implementing appropriate operating practices;
  - reviewing the impact of our operations;
- communicate this Policy to all Greatland employees and contractors;
- proactively encourage input and feedback from Community Stakeholders for consideration and decision making;
- regularly review this Policy and continuously strive to achieve high standards of cultural heritage management;
- create workplaces where Aboriginal people and Traditional Owners feel welcome and valued;
- incorporate cultural and heritage site information into site training, including inductions;
- provide all employees and contractors with opportunities for cross cultural awareness training in partnership with Aboriginal people and Traditional Owners;
- maintain open communication with Traditional Owners.

3. Responsibility for this Policy

All Greatland personnel must comply with this Policy and direct any queries on Cultural Heritage and Community matters to the Heritage and Community Principal.

For specific Greatland sites and operations, the Managing Director will delegate day-to-day responsibility for the implementation of this Policy and the matters covered by it to an appropriate individual (the **Delegate**).

Any breaches of this Policy must be reported to the Managing Director or the Company Secretary.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-012	Yes

Diversity and Inclusion Policy

1. Purpose and objectives

1.1 Principles

Greatland Resources Limited (**Greatland** or the **Company**) recognises the importance and benefits of diversity and inclusion to our business, and is committed to creating a workplace culture that welcomes, values, practices and promotes diversity.

In the context of this Policy "**diversity**" includes (but is not limited to) differences in gender, race, ethnic and social origin, age, cultural and socio-economic background, sexual orientation, religious beliefs, political opinions, education, family responsibilities, marital or family status, experience, thought, and gender identity.

Through diverse and inclusive teams, we gain access to the best talent, encourage innovation and creativity, and ensure balance across the different functions of our business where everyone's input is valued and encouraged.

Greatland is committed to providing a fair and inclusive workplace where:

(i) everyone feels respected;

(ii) everyone has equal access to opportunities and reward is based on merit; and

(iii) where inappropriate conduct is not condoned or tolerated.

Greatland is committed to ensuring our policies, systems, processes, and practices support these Policy principles.

1.2 Purpose

The purpose of this Policy is to:

(i) outline the Company's commitment to diversity and inclusion;

(ii) set out the responsibilities of the Board, senior executives and other employees to achieve the objectives of this Policy;

(iii) make Directors, senior executives and other employees aware of the consequences of breaching this Policy; and

(iv) give effect to the ASX's Corporate Governance Principles and Recommendations (**ASX Recommendations**).

1.3 Giving effect to the Policy principles

(a) Overall approach

In broad terms, Greatland will give effect to the Policy principles through:

(i) the application of diverse strategies to deliver the Policy;

(ii) the pursuit of diverse corporate, business and market opportunities;

(iii) nurturing and developing the collective relevant skills, and diverse experience and attributes, of personnel within the Company; and

(iv) ensuring that the Company's culture and management systems are aligned with and promote the attainment of the Policy principles.

(b) Specific practices

The Company will put the Policy principles into practice in the following specific ways:

(i) the Company will ensure that employee recruitment and selection practices at all levels (including the Board) are appropriately structured so that a diverse range of candidates are considered and that there are no conscious or unconscious biases that might discriminate against certain candidates. To hire the best person for the job, there needs to be a consideration of a broad and diverse pool of talent;

(ii) the Company will identify, implement and develop strategies, initiatives and programs to develop a broader and more diverse pool of skilled and experienced employees with a view to preparing those employees over time, for senior management positions and to increase the representation of women in management roles;

(iii) the Company will not tolerate discrimination, harassment, vilification or victimisation of any kind whether on the grounds of gender, race, ethnic or social origin, cultural or socio-economic background, sexual orientation, religious beliefs, political opinions, education, family responsibilities, marital or family status, gender identity, pregnancy, physical or mental disability, trade union membership, non-membership or lawful union activity (**Unacceptable Conduct**) of any employee of the Company, and will ensure that it:

- provides appropriate avenues through which employees can report Unacceptable Conduct; and
- properly investigates and disciplines Unacceptable Conduct;

(iv) the Company will foster an inclusive culture, involving all genders and diversity at all levels of the organisation, including the Board;

(v) the Company will empower team members to manage their productivity, effectiveness and personal situation, and will consider all reasonable requests for flexible ways of working;

(vi) the Company will monitor remuneration across its workforce, with strategies in place to achieve gender pay equity; and

(vii) Company management will monitor, review and report to the Board (through the Remuneration and Nomination Committee) on the progress and achievement of this Policy.

2. Achieving diversity

2.1 Compliance with ASX Recommendations

The Company will comply with the ASX Recommendation 1.5 by:

(i) establishing this Policy as a compliant policy, by:

- establishing measurable objectives for achieving gender diversity (this may include setting specific numerical targets for the proportion of women employed by the Company in senior executive roles and on the Board); and
- the Board assessing annually the measurable objectives for achieving gender diversity and the progress towards achieving them;

(ii) disclosing this Policy on the Company's website;

(iii) disclosing at the end of each reporting period:

- the measurable objectives for achieving gender diversity set by the Board in the terms of this Policy;
- the progress from time to time towards achieving the measurable objectives; and
- the respective proportions of men and women in the Company in the following positions:
  - senior executives (including how 'senior executive' is defined for this purpose);
  - Directors; and
  - across the Company generally (permanent employees and Directors).

The Company Secretary will be responsible for ensuring that the Company meets its compliance and reporting obligations referred to in this Section 2.1, including by collecting and collating relevant data and ensuring that management processes and systems are adequate and effective for such reporting obligations to be met.

2.2 Measurable objectives, targets and key performance indicators - gender diversity

With respect to gender diversity, the Company's management will:

(i) develop, for approval by Board (through the Remuneration and Nomination Committee), as appropriate measurable objectives, targets or KPIs to for achieving gender diversity including about the practices referred to in Section 1.3(b);

(ii) measure performance against those targets and KPIs, and

(iii) report from time to time (at least annually) to the Remuneration and Nomination Committee on the above.

3. Management and accountability

3.1 Responsibility for Policy

Although the Board retains ultimate accountability for this Policy, the Board has delegated responsibility for implementation of this Policy to the Remuneration and Nomination Committee.

The Remuneration and Nomination Committee has delegated day-to-day responsibility for the implementation of this Policy and the matters covered by it to the Company Secretary.

3.2 Breaches of this Policy and Unacceptable Conduct

(a) Reporting

Greatland employees are strongly encouraged to report any breaches of this Policy and any Unacceptable Conduct (whether directed towards themselves or another Greatland employee), through one of the following avenues:

(i) the employee's direct manager;

(ii) the Senior Executive to whom the employee ultimately reports;

(iii) the Company Secretary;

(iv) the Managing Director;

(v) the Remuneration and Nomination Committee Chair; or

(vi) in accordance with the Company's Whistleblowing Policy.

(b) Disciplinary action

Any Greatland employee who breaches this Policy or undertakes Unacceptable Conduct will face disciplinary action which could result in the employee's dismissal.

3.3 Accountability

At least annually, the Remuneration and Nomination Committee will report to the Board on progress and achievement of this Policy and otherwise to facilitate the Board in complying with the ASX Recommendations.

3.4 Policy management

Approval of this Policy is vested with the Board.

Review of this Policy is the responsibility of the Remuneration and Nomination Committee and will be conducted annually, to ensure that the Policy remains consistent with relevant legislative and regulatory requirements and changes of the Company.

The Company will disclose the extent to which implementation of this Policy has complied with the ASX Recommendations in the Company's annual Corporate Governance Statement.

3.5 Caveat

Nothing in this Policy shall be interpreted to:

(i) encourage or condone the selection or promotion of people to work within the Company for reasons other than their overall merit and prospect of adding value to the Company and enhancing the probability of achievement of the Company's objectives;

(ii) endorse any discriminatory behaviour by or within the Company which is contrary to the law, or contrary to the Code of Conduct or any other codes or policies which govern conduct or behaviour for the Company and its personnel; and

(iii) give any existing person within the Company any reason to feel threatened or prejudiced by this Policy in their career development or otherwise, merely because their diversity attributes at any time may be more, rather than less, common with others.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-013	Yes

Environmental and Climate Change Policy

1. Principle and purpose

Greatland Resources Limited (**Greatland** or the **Company**) acknowledges that its activities impact the environment and have the potential to contribute to ongoing climate challenges.

Greatland is committed to operating in an environmentally responsible manner and has developed this Policy to assist in managing the impacts its activities have on the environment.

2. Policy strategies

To achieve its commitments, at sites and operations that Greatland controls we will:

- comply with relevant environmental legislation, regulations and approval conditions and ensure prompt reporting and remediation of any non-compliance;
- implement and maintain an effective risk-based Environmental Management System;
- consider environmental and climate change impacts, risks and opportunities when making business decisions;
- promote practices, systems, values and behaviours that promote environmental awareness and sustainability;
- promote the conservation of natural resources where practicable by efficiently and responsibly using water and energy and continually improving our processes to minimise pollution and waste;
- in respect of site closure and rehabilitation:
  - rehabilitate land after the closure of mining sites, to minimise negative impacts on the land and maximise benefits;
  - design and regularly update site closure plans;
  - consult with relevant local communities in site closure planning;
  - plan for sufficient funding for forecast site closure and rehabilitation;
- protect biodiversity by adopting a hierarchy of Avoid, Minimise, Mitigate, Rehabilitate and Offset and by conducting baseline assessments, regular monitoring and engaging with technical experts;
- consult and engage with stakeholders on environmental matters in relation to our activities;
- develop a contractor engagement process that seeks to ensure rigorous environmental management and compliance throughout the entire supply chain
- provide appropriate and ongoing information, instruction, training and supervision enabling our people to demonstrate their personal commitment to environmental excellence at our operations;

- allocate appropriate resources to these commitments and its legal obligations;
- monitor and seek to continually improve its environmental performance; and
- communicate this Policy and report on Greatland's environmental performance in an open, transparent and accurate manner.

3. Responsibility for this Policy

All Greatland personnel must comply with this Policy and any related environmental policies and procedures. If an individual is in any doubt regarding environmental matters, they should contact the Health, Safety and Environment Manager.

The Greatland Board of Directors has ultimate responsibility for the oversight of all environmental-related matters and has approved this Policy.

On behalf of the Board, the Health, Safety and Sustainability Committee is responsible for reviewing this Policy, overseeing Greatland's environmental practices, and assisting the Audit and Risk Committee in assessing and managing environmental risks as part of the Company's risk management framework. The Health, Safety and Sustainability Committee will periodically review this Policy and adapt it as required.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-014	Yes

Human Rights Policy

1. Principle and purpose

Greatland Resources Limited (**Greatland** or the **Company**) is committed to respecting human rights and believes that all people should be treated with dignity and respect.

Greatland seeks to create positive social impacts by mitigating human rights related risks and promoting respect for human rights across our operations and activities.

2. Policy strategies

As a part of our commitment to respecting human rights, Greatland will:

- work to align our business activities and practices with the *UN Guiding Principles on Business and Human Rights*;
- treat our employees fairly and without harassment or discrimination, and promote diversity in the workplace;
- recognise the rights of our employees to allow freedom of association and collective bargaining;
- take actions to facilitate the prevention of work-related risks and health hazards;
- reject any form of slavery, forced or child labour, and work to ensure that such practices are not present in our business or our supply chain;
- seek to avoid knowingly engaging in business activities where it could be complicit in human rights abuses, including *Modern Slavery Act 2018* requirements;
- if Greatland discovers that it is associated with human rights violations, appropriate action will be taken in a timely manner;
- respect the human rights of the communities in which we operate;
- engage with stakeholders on human rights issues and provide an easily accessible complaints mechanism to resolve grievances in a timely manner;
- recognise the rights of Indigenous peoples, acknowledging their connections to lands and waters and respecting their culture;
- make contractual commitments with suppliers that require them to comply with applicable human rights laws, and encourage them to adhere to the same principles contained in this policy statement, in accordance with the Supplier Code of Conduct;

3. Responsibility for this Policy

If an individual is in any doubt regarding human rights matters, they should contact the Company Secretary.

The Greatland Board of Directors has ultimate responsibility for the oversight of all human rights related matters and has approved this Policy.

On behalf of the Board, the Health, Safety and Sustainability Committee is responsible for reviewing this Policy, overseeing Greatland's human rights practices, and assisting the Audit and Risk Committee in assessing and managing human rights risks as part of the Company's risk management framework. The Health, Safety and Sustainability Committee will periodically review this Policy and adapt it as required.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-015	Yes

Risk Management Policy

1. Policy statement

Greatland Resources Limited (**Greatland** or the **Company**) acknowledges that risk is inherent in all of its business and that effective management of risk and opportunity is essential to our success and future growth.

The operations of Greatland and its controlled subsidiaries are to be conducted in a manner which ensures, as far as reasonably practicable, that:

- the performance of the Greatland (operational, financial, commercial, corporate and otherwise) and its prospect of achieving its goals and objectives for the benefit of its shareholders are optimised;
- the health, safety and wellbeing of all employees, customers, visitors to sites and others who may be affected by our operations are respected;
- all applicable legislation and regulatory obligations are met;
- assets are protected against loss and damage;
- Greatland's reputation and image, and that of its personnel, are not disrespected or damaged; and
- the community and environment are respected.

2. Strategies to achieve Policy objectives

To achieve this Policy's objectives, Greatland will seek to:

- identify and monitor issues that may impede its goals, objectives and performance;
- implement and maintain a sound risk management framework (which covers strategic, operational and other enterprise risks) based on industry accepted standards;
- implement and maintain internal systems in order to provide management with accurate, relevant, timely and reliable financial and operating information;
- monitor and resolve workplace health, safety and wellbeing issues;
- conduct operations and maintain records in accordance with policies and legislative requirements;
- monitor and report to the Board, through the Audit and Risk Board Committee, concerning risk management, significant circumstances and risk management issues;
- implement and maintain loss prevention and control measures directed at reducing, transferring or otherwise mitigating (within appropriate risk assessed parameters) the potential for loss or damage;

- manage insurance programs to allow Greatland. to acquire appropriate coverage at reasonable premium levels and on reasonable terms having regard to industry standards; and
- implement and maintain effective business continuity and crisis management risk strategies.

3. Responsibility for this Policy

The Greatland Board of Directors, with the assistance of the Audit and Risk Committee, is responsible for setting (in consultation with management) the appetite and tolerance for risk, overseeing Greatland's risk management framework, and satisfying itself that the risk management framework is sound. The Audit and Risk Committee will review the risk management framework, risk register, policies and management processes at least annually.

The Managing Director has day-to-day responsibility for Greatland's risk identification and risk management strategies and practices.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-016	Yes

Securities Dealing Policy

1. Policy principle and objectives

1.1 Key definitions

In this Policy:

(a) **Greatland Personnel** means all full-time, part-time and casual employees, contractors, consultants and advisers, of Greatland Resources Limited (**Greatland** or the **Company**) and Greatland group companies (the **Group**), as well as all Restricted Persons.

(b) **Restricted Persons** means the:

(i) directors, officers, KMPs, PDMRs (as defined in Sections 3.1 (o) and (p) respectively) and the Company Secretary of Greatland and Group companies; and

(ii) other Group employees as designated by the Managing Director and Company Secretary from time to time,

and persons associated with them (including close family; entities, trusts or investment vehicles over which they exercise control or material influence or of which they are a beneficiary; and business or other associates).

(c) **Securities** means shares, options, share rights (including performance rights and similar incentive share rights), warrants, and any other equity, debt or derivative instruments, or other linked financial instruments, including instruments to limit the economic risk of other securities held.

(d) **Deal** or **Dealing** means, in respect of Securities, any type of transaction including to:

(i) buy, sell, transfer, short-sell, subscribe for, or exchange; or

(ii) in the case of convertible Securities (including employee incentive convertible securities), accept, elect to exercise or convert; or

(iii) otherwise transact, including (without limitation) using Securities as security for a loan or other obligation and entering into, amending or terminating any agreement (even if it is conditional) to subscribe for, buy or sell, or exercise or convert, any Securities; or

(iv) pass on information which is not generally available to the market and, if it were generally available to the market, would be likely to have a material effect on the price or value of the Company's Securities to a third party where that person knows, or ought reasonably to know, that the third party would be likely to buy or sell the Securities, or enter into an agreement to apply for, buy or sell Securities in the Company,

or to direct, procure, induce or encourage another person to do any of these things.

1.2 Policy principle

Greatland Personnel must not:

(a) Deal in Company Securities; or

(b) place themselves in a position where it may reasonably be perceived that they have Dealt in Company Securities,

other than in compliance with this Policy.

1.3 Policy objectives

The Policy is designed to seek to ensure that:

(a) Greatland Personnel are aware of, and do not breach the "insider trading" laws under the *Corporations Act 2001* (Cth) (**Corporations Act**) , the Market Abuse Regulation or other applicable laws and regulations (see the **Annexure** for a summary of these laws);

(b) Greatland Personnel do not Deal in Company Securities while they may be in possession of price sensitive information which has not been released to the Australian Securities Exchange (**ASX**) market announcements platform and through the London Stock Exchange (**LSE**) Regulatory News Service (**RNS**) by the Company (including information withheld from release due to continuous disclosure exceptions or exemptions that apply), or pass that information on to persons who would be likely to Deal in Company Securities; and

(c) perceptions do not arise that Greatland Personnel may be taking advantage of their position in the Company (or that of a person with whom they are associated), even if such perceptions are wrong or unsubstantiated.

This Policy has been developed to meet regulatory requirements (including pursuant to Rule 21 of the AIM Rules) and generally accepted principles and standards of conduct.

2. Prohibitions for all Greatland Personnel

2.1 General prohibition

Greatland Personnel must not:

- deal in Greatland securities or enter into an agreement to do so;
- procure, advise or encourage another person to deal in Greatland securities in any way or enter into an agreement to do so; or
- pass on any potentially price sensitive information to another person where Greatland Personnel ought reasonably to know that the person may deal or procure another person to deal in Greatland securities,

where they may be in possession of price sensitive information or Greatland has given notice to any or all Greatland Personnel that they must not deal in securities (either for a specified period, or until Greatland gives further notice).

2.2 Short term trading, short-selling and hedging prohibited

Greatland Personnel must not engage in:

(a) **Short term buying and selling** of Company Securities. In considering what is "short term" for the purposes of this Policy, selling within three (3) months of buying securities in the Company is given as guidance. Restricted Persons seeking Dealing Approval to sell securities in the Company should disclose when they last bought securities when seeking a Dealing Approval if that information is relevant in considering whether this Section is offended by the proposed Dealing.

(b) **Short selling** of Company Securities (that is, entering into a transaction or position which would result in profiting from a decline in the price of Company Securities).

(c) **Hedging transactions** of Company Securities, meaning entering into an arrangement if the arrangement would have the effect of limiting the exposure of the member to risk relating to an element of the person's remuneration that has not vested or has vested but remains subject to a holding lock. (The Corporations Act also prohibits such hedging transactions for persons who have authority and responsibility for planning, directing and controlling the activities of the entity (including Directors) and their closely related parties.)

3. Rules and protocols for Restricted Persons

In addition to the above prohibitions applicable to all Greatland Personnel, Restricted Persons are also prohibited from Dealing in Company Securities unless permitted by the remainder of this Policy.

3.1 Dealing Approvals

(a) **Dealing Approval** means prior written approval in respect of a proposed Dealing (obtained before any Dealing occurs), granted by a person who is authorised by this Section 3.1 to give that approval.

(b) Persons seeking a Dealing Approval under this Section 3.1 must apply in writing by email and must supply to the person to give the Dealing Approval all information known to the applicant that may be material to the Dealing Approval being granted, including the nature of the Securities and the Dealing. Requests for Dealing Approval should be copied (cc'd) to the Company Secretary.

(c) Any Dealing Approval issued under this Section 3 is deemed to have been given during a declared Trading Window (refer to Section 4 below).

Directors, PDMRs, Company Secretary

(d) Any Director, PDMR (as defined in Section 3.1(p) below) or Company Secretary, or any persons associated with them, must obtain Dealing Approval from the Chair (or in their absence by the Deputy Chair or Managing Director).

(e) The Chair, Deputy Chair, Managing Director or Company Secretary cannot grant a Dealing Approval to themselves or to persons associated with them.

(f) The Chair is required to obtain the Dealing Approval of the Deputy Chair, or of the Managing Director and one non-executive Director jointly, prior to any trade by the Chair or a person associated with the Chair.

Other Restricted Persons

(g) Other Restricted Persons must obtain Dealing Approval:

(i) if they report directly to the Managing Director, from the Managing Director; or

(ii) otherwise, from the Company Secretary.

(h) The Managing Director or the Company Secretary (as applicable) may consult with the Chair before issuing a Dealing Approval where they consider it necessary or appropriate to do so.

Validity

(i) A Dealing Approval is valid for two Business Days (excluding the day that the approval is received) (**Validity Period**).

(j) The Validity Period may be shortened at any time by a person authorised to issue a Dealing Approval by notice in writing to the relevant person to whom the Dealing Approval was issued.

Notification of Dealings

(k) All Dealings by Restricted Persons pursuant to a Dealing Approval must be notified to the Company Secretary within two Business Days of the Dealing. If the Restricted Person is a Director, an announcement must also be made within the timeframe stipulated under the ASX Listing Rules detailing the transaction. It is the responsibility of the Director to ensure that the relevant form is completed and provided to the Company Secretary within the relevant time frame.

Reporting

(l) The issue of a Dealing Approval is to be reported to the Board at the next Board meeting.

(m) The Company Secretary will maintain a written record of Dealing Approval requests and responses. A copy of the response and Dealing Approval (if granted) will be given to the Restricted Person.

Associates

(n) Restricted Persons are required to use their best endeavours to ensure that persons associated with them are aware of and comply with this Policy. An associate is regarded as including:

(i) close family members of the Restricted Person;

(ii) a company or trust over which the Restricted Person exercises control or material influence, or is a beneficiary;

(iii) a business or other associate of any of the Restricted Person or any of the persons above.

KMPs

(o) In the context of the Australian Securities Exchange (**ASX**), Key Management Personnel (**KMP**) are broadly defined as the senior decision-makers in a company. Specifically, they are individuals with authority and responsibility for planning, directing, and controlling the company's activities, including any directors, whether executive or non-executive.

PDMRs

(p) A **PDMR** is a person discharging managerial responsibilities in respect of the Company, being either a Director or a senior officer who is not a Director but has regular access to price sensitive information or inside information relating directly or indirectly to the Group and power to take managerial decisions affecting the future developments and business prospects of the Company. The Company will notify all PDMRs of their designation as such and of their obligations.

(q) Each PDMR must notify each of its "persons closely associated" (**PCA**) with that PDMR (and keep a record of such notification) that it must not Deal in Company Securities except during a Trading Window (as defined in Section 4(a) below) and after any such Dealing must notify the Company Secretary immediately of the transaction details. A PCA of a PDMR means:

(i) a PDMR's spouse or civil partner;

(ii) a PDMR's child or step-child under the age of 18 who is unmarried and does not have a civil partner;

(iii) a PDMR's relative who has shared the same household as the PDMR for at least one year prior to the date of the transaction concerned; or

(iv) a legal person, trust or partnership, the managerial responsibilities of which are discharged by a PDMR or by a person in any of the foregoing categories, which is directly or indirectly controlled by such a person, which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person.

(r) Each PDMR must keep a record of the notification to its PCAs informing them of the PCA's restrictions and disclosure obligations, take reasonable steps to ensure the PCAs are aware of their responsibilities and provide the Company Secretary with a list of all of its PCAs and notify the Company of any changes to that list. The Company will keep a record of its PDMRs and their PCAs.

(s) All trades by PDMRs and their persons closely associated are to be notified to the Company Secretary within two working days of the relevant trade and to the UK Financial Conduct Authority (the **FCA**) (using the PDMR notification form, a copy of which is available on the FCA website) no later than three working days after the trade.

(t) The Company will make a RNS announcement of any information notified to it by PDMRs and their PCAs under this sub-paragraph within two working days of receipt of such notification.

(u) The Company will complete an Appendix 3Y and give it to the ASX no more than five business days after all trades by directors of Greatland.

4. Trading Windows, Prohibited Periods and Closed Periods

(a) The following definitions apply to this Section 4:

Business Day means:

(i) in relation to anything done or to be done in (including to be submitted to a place in) any part of the United Kingdom, any day which is not a Saturday or Sunday, Christmas Day, Good Friday or a bank holiday in that part of the United Kingdom; or

(ii) in relation to anything done or to be done in (including to be submitted to a place in) any part of Australia, a day, other than a Saturday or Sunday, on which banks are open for general business in Perth, Australia.

Closed Period means any time which is not a Trading Window or which is a MAR Closed Period.

MAR Closed Period means the period from 1 July or 31 December respectively until the publication of the Company's annual and half-yearly results.

Prohibited Period means any period in which the Company is in possession of information that would be disclosable to the market under:

(i) ASX Listing Rule 3.1 but for the application of, and reliance upon, an exemption allowed under ASX Listing Rule 3.1A; or

(ii) Article 17(1) of the Market Abuse Regulation but for the application of, and reliance upon, an exemption allowed under Article 17(4) of the Market Abuse Regulation; or

(iii) AIM Rule 11 but for the application of, and reliance upon, an exemption under the Guidance Notes to AIM Rule 11.

Trading Window means a period in which:

(i) in relation to a Director, Company Secretary or other PDMR, a Dealing Approval applies (either generally or specific to any particular Director, Company Secretary or other PDMR); or

(ii) in relation to other Restricted Persons, a period declared to be a trading window by the Chair (or in their absence the Deputy Chair or Managing Director), which is to be provided in writing, and which in the absence of any stipulated period is valid for a period of two weeks, provided that the Chair (or the Deputy Chairman or Managing Director as applicable) may at any time, by notification in writing to relevant Restricted Persons, “close” a declared Trading Window.

(b) Trading Windows must not be declared or allowed to continue during a Prohibited Period. Without limiting (or prescribing) the Chair’s discretion (or in their absence that of the

Deputy Chair or Managing Director), typically Trading Windows might be declared for periods commencing two (2) Business Days after:

(i) the release of the Company's annual, half yearly results or quarterly reports (as applicable);

(ii) the release of a prospectus by the Company (other than a transaction specific prospectus);

(iii) the Company's Annual General Meeting; or

(iv) other times at the Chair's discretion.

(c) During Trading Windows, Dealing in Company Securities by Restricted Persons (other than a Director, Company Secretary or other PDMR) is permitted, without a specific Dealing Approval.

(d) During Closed Periods, Dealing in Company Securities by Restricted Persons is prohibited other than pursuant to a Dealing Approval.

(e) During MAR Closed Periods, Dealing in Company Securities by PDMRs is prohibited other than pursuant to a Dealing Approval, which will only be granted in exceptional circumstances, such as those set out in Section 5(c) below.

(f) During Prohibited Periods, no Dealing in Company Securities by Restricted Persons is permitted unless otherwise permitted under Section 5(c).

Exceptional circumstances

(g) If a Restricted Person needs to Deal in Company Securities during a Closed Period, a MAR Closed Period or Prohibited Period and is not in possession of any price-sensitive information, then they may apply for a Dealing Approval under Section 5.

(h) Exceptional circumstances are likely to include severe financial hardship or compulsion by court order or other legal requirement to transfer Company securities.

(i) A Dealing Approval will only be granted if the Restricted Person's application is accompanied by sufficient evidence (in the opinion of the person providing the approval) that the Dealing is the most reasonable course of action available in the circumstances.

(j) Unless otherwise specified in writing by the Company, any Dealing permitted by a Dealing Approval given for exceptional circumstances must still comply with the other requirements of this Policy.

5. Dealing Approvals and exceptional circumstances

(a) Without limiting (or prescribing) the discretion of the person issuing a Dealing Approval, approval for Dealing in Company Securities might commonly be expected where:

(i) it is not a Prohibited Period;

(ii) there will be no breach of "insider trading" or "insider dealing" laws by reason of the proposed trade; and

(iii) adverse reputational imputations for the Company and its governance are unlikely to arise by reason of the proposed trade.

(b) Without limiting (or prescribing) the discretion of the person issuing the Dealing Approval, approval for trading in the Company's securities is unlikely to be given where:

(i) it is a Prohibited Period; or

(ii) it is not a Prohibited Period but it is in a period after the close of the Company's books for a relevant period, and before the release of the Company's annual or half yearly results for that relevant period, other than if the Dealing Approval is sought in exceptional circumstances.

(c) A Dealing Approval request by a PDMR during a MAR Closed Period or a Prohibited Period will only be granted in exceptional circumstances such as:

(i) severe financial hardship which requires the immediate Dealing;

(ii) where the Dealing is made under, or related to, an employee share or saving scheme, qualification or entitlement of shares or where the beneficial interest in the relevant Company security does not change as a result of the transaction, but in each case only where the PDMR is able to demonstrate that the Dealing could not have been executed at another time not during the MAR Closed Period or a Prohibited Period; or

(iii) if the Dealing is otherwise permitted in accordance with the Market Abuse Regulation.

(d) Where the person to give the Dealing Approval has reason to believe that the proposed Dealing is in breach of this Policy or any of the restrictions contained in the Market Abuse Regulation or any other Regulations (defined at Section 6(a) below), the Dealing Approval must not be given.

6. Compliance with applicable laws and regulations

(a) The Company is an Australian public company listed on ASX whose shares are also admitted to trading on the LSE's AIM Market, and is therefore subject to the Corporations Act, ASX Listing Rules, AIM Rules and Market Abuse Regulation (together the **Regulations**).

(b) This Policy will be interpreted and construed so as to be consistent with all applicable Regulations.

(c) If anything in this Policy is contrary to the applicable Regulations, then that provision will be severed from this Policy to the extent of the contradiction.

(d) The Company must comply with the Regulations in administering this Policy and in reporting any relevant Dealing in Company Securities by Restricted Persons.

7. Exclusions

(a) Subject to Section 6, the mere take up of entitlements, or exercise of vested options, to subscribe for Company Securities under a pro rata rights issue to all shareholders, an employee share option plan (or similar) or the mere take up of Company Securities under a dividend re-investment plan (or similar) does not constitute a "Dealing" in Company Securities for the purpose of this Policy.

(b) Notwithstanding the above, PDMRs are not permitted to undertake any of the above dealings during a MAR Closed Period without prior Dealing Approval. A Dealing Approval will only be granted in exceptional circumstances such as those set out in Section 5(c) above.

8. Margin loans, margin calls, share loans and other arrangements

(a) For the purposes of this Policy, Dealing in Company Securities includes the grant of a security interest over Company Securities and any other contractual arrangement where:

(i) an entitlement to exercise a right attaching to Company Securities of a Restricted Person is assigned to or is exercisable by another party;

(ii) a Restricted Person may become contractually obliged to a third party to Deal in Company Securities, including but not limited to margin call arrangements.

(b) Dealing in Company securities by Restricted Persons in the terms of (a) above is not permitted other than with a Dealing Approval.

(c) A Dealing Approval under (b) should not be expected to be given to a Restricted Person having regard to the risk of a forced trade in Company Securities as part of the arrangement during a Prohibited Period, and the consequential legal and market reputational risk.

9. Communication, education and training

This Policy is to be communicated to all Directors, officers and employees of the Company, and form part of induction and periodic follow up education and training. A copy of this Policy will be included on the Company's website.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-017	Yes

Annexure

Summary of the insider trading and insider dealing provisions

1. Prohibition

Insider trading is a criminal offence under Australian laws. It may also result in civil liability. In broad terms, a person will be guilty of insider trading under the Corporations Act if:

(a) that person possesses information which is not generally available to the market and, if it were generally available to the market, would be likely to have a material effect on the price or value of the Company's securities (i.e., information that is 'price sensitive'); and

(b) that person:

(i) applies for, buys or sells securities in the Company (enters into an agreement to do so); or

(ii) procures someone else to buy or sell securities in the Company (or enter into an agreement to do so); or

(iii) passes on that information to a third party where that person knows, or ought reasonably to know, that the third party would be likely to:

a. apply for, buy or sell the securities, or enter into an agreement to apply for, buy or sell securities in the Company; or

b. procure someone else to apply for, buy or sell the securities of the Company, or enter into an agreement to apply for, buy or sell securities in the Company.

The restrictions in relation to insider dealing under the Market Abuse Regulation is similar to insider trading under the Corporations Act and is an offence. In broad terms, under the Market Abuse Regulation, insider dealing arises where a person:

(a) possesses information that is of a precise nature, which has not been made public, relating, directly or indirectly, to the Company's securities, and which, if it were made public, would be likely to have a significant effect on the price of the Company's securities ("inside information"); and

(b) either:

(i) uses inside information by acquiring or disposing of (or cancelling or amending an order to acquire or dispose of), for its own account or for the account of a third party, directly or indirectly, the Company's securities; or

(ii) recommends or induces another person to deal in the Company's securities on the basis of the inside information; or

(iii) discloses the inside information to another person, except where the disclosure is made in the normal exercise of employment, profession or duties.

In addition, under the UK Criminal Justice Act 1993, an individual who is an insider may commit a criminal offence where:

(a) they deal in price-affected securities when in possession of inside information;

(b) they encourage another to deal in price-affected securities when in possession of inside information; or

(c) they disclose inside information otherwise than in the proper performance of their employment, office or profession.

2. **Examples**

To illustrate the prohibition described above, the following are possible examples of price sensitive information which, if made available to the market, may be likely to affect materially or significantly the price of the Company's securities:

(a) the Company considering a major acquisition or disposal of assets;

(b) the threat of major litigation against the Company;

(c) the Company's financial performance or position (for example, its revenue and profit or loss) materially exceeding (or falling short of) the market's expectations;

(d) a material change in debt, liquidity or cash flow;

(e) a significant new development or project proposal;

(f) the granting (or loss) or a major contract;

(g) a management or business restructuring proposal; and

(h) a share issue proposal;

(i) an agreement or option to acquire an interest in a mining tenement or other significant asset, or to enter into a joint venture or farm-in or farm-out arrangement in relation to a mining tenement or other significant asset;

(j) significant discoveries, exploration results, or changes in reserve/resource estimates from mining tenements in which the Company has an interest;

(k) under subscriptions or over subscriptions to an issue of securities; and

(l) giving or receiving a notice of intention to make a takeover.

3. **Dealing through third parties**

A person does not need to be a Director, officer or employee of the Company to be guilty of insider trading in relation to securities in the Company. The prohibition extends to dealings by Directors, officers and employees through nominees, agents or other associates, such as family members, family trusts and family companies.

4. **Information however obtained**

It does not matter how or where the person obtains the information – it does not have to be obtained from the Company to constitute inside information. (eg. even if the Director, officer or employee overhears it or is told in a social setting).

5. **Employee share schemes**

The insider dealing prohibitions under the Corporations Act and Market Abuse Regulation applies to acquisitions of Company securities by employees made under employee equity

incentive schemes, including the acquisition of shares as a result of any non-automatic exercise of securities under an employee equity incentive scheme.

Further, both the insider trading and insider dealing prohibitions apply to the sale/disposal of any shares acquired under an employee equity incentive scheme, including the sale of shares acquired following the vesting and/or exercise of Company securities granted under an employee equity incentive scheme.

6. **Confidential information**

Directors, officers and employees also have a duty of confidentiality to the Company. A Director, officer or employee must not reveal any confidential information concerning the Company, use that information in any way which may cause loss to the Company, or use that information to gain an advantage for themselves or anyone else. Directors, officers and employees should ensure that if confidential information is legitimately required to be provided to external advisers that they are also aware they have a duty of confidentiality to the Company.

Supplier Code of Conduct

1. Principle and purpose

This Supplier Code of Conduct sets out the minimum standards that all third party suppliers and their employees and contractors (together, **Suppliers**) of Greatland Resources Limited (**Greatland** or the **Company**) are required to comply with.

This Code states the values and higher standards that Greatland adopts and encourages our Suppliers to share with us, which will be taken into consideration in the selection of Suppliers.

The Greatland Values are Integrity, Safety, Teamwork, Accountability, Responsibility and Results. Greatland favours Suppliers that share similar values.

2. Minimum requirements

Greatland requires Suppliers to comply with the following minimum requirements:

- never engage in bribery or corruption (directly or through intermediaries);
- act all times with integrity, transparency and honesty, in particular:
  - never engaging in fraud, tax evasion, money laundering, insider trading or deceptive or misleading practices;
  - maintaining accurate books, records and accounts;
  - complying with all legal and regulatory requirements, and reporting any breaches of laws and regulations; and
  - ensuring the protection of whistleblowers;
- complying with internationally proclaimed human rights, including:
  - freedom from forced and child labour;
  - freedom from discrimination at work; and
  - freedom of association to form and join a union, and to bargain collectively;
  - freedom from corporal punishment and corporal disciplinary practices;
- complying with all applicable modern slavery laws, including not engaging in human trafficking, slavery, servitude, forced labour, forced marriage, deceptive recruiting for labour and services, debt bondage and child labour;
- complying with all applicable employment laws, including minimum wage and maximum working hours;
- not perpetrating or permitting violence, or threats of violence in the workplace or any harassment or bullying in any form;
- complying with data privacy and regulatory requirements when personal information is collected, stored, processed, transmitted and shared;

- declaring any actual or potential conflicts of interest in dealings with Greatland, and ensure any gifts or hospitality are reasonable, appropriate and for legitimate business purposes;
- respecting confidentiality.

3. Workplace health, safety and wellbeing

Greatland requires Suppliers to comply with the following minimum requirements:

- complying with all relevant laws and regulations related to workplace health and safety;
- ensuring a safe workplace and maintaining appropriate workplace health and safety practices; and
- reporting accidents and unsafe work practices to your immediate manager, or a health and safety representative on site, and to Greatland if on a Greatland controlled site.

4. Environment and Sustainability

Greatland is committed to operating in an environmentally responsible manner and managing the impacts its activities have on the environment.

Greatland requires Suppliers to comply with the following minimum requirements:

- complying with all relevant laws and regulations relating to environmental issues, management and reporting; and
- maintaining a process aimed at tracking environmental performance over time and supporting environmental reporting and compliance with legislative requirements.

5. Cultural Heritage and Communities

Greatland conducts operations that may be on or near land that is significant to Traditional Owners, and recognises the cultural, spiritual and physical connections that Aboriginal people have with their land and surrounding environment.

Greatland values Suppliers who:

- engage local employees, contractors, products or services in their business;
- demonstrate action to increase indigenous employment in their business; and
- respect the heritage, cultural values, traditions and beliefs of indigenous people.

6. Greatland's Governance Policies

Greatland requires its Suppliers to comply with the following Greatland Governance Policies, where applicable, in respect of their supply arrangements with Greatland:

- Workplace Health, Safety and Wellbeing Policy;
- Environmental and Climate Change Policy;
- Cultural Heritage and Communities Policy;
- Human Rights Policy; and

- Anti-Bribery and Corruption Policy,

unless agreed otherwise by contract.

7. Compliance

The requirements outlined in this Code are important to Greatland and its reputation.

Greatland may monitor and assess Suppliers' compliance with this Code, including seeking written confirmation of their acceptance and compliance.

If a Supplier finds it difficult to comply with the requirements in this Code, this should be reported and shared with a Greatland representative.

Greatland aims to work with Suppliers to develop and implement corrective action plans where possible, in line with its value of Teamwork. However, serious breaches or continued non-compliance with this Code may lead to suspension or termination of the supply of goods or services from the Supplier.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-018	Yes

Speak Up Policy

1. Purpose and Application

Greatland Resources Limited (**Greatland** or the **Company**) is committed to conducting its business lawfully, ethically and responsibly.

Greatland encourages the reporting of any potential misconduct concerns. This Policy has been adopted to provide a safe and confidential environment for people to raise any such concerns without fear of reprisal or detrimental treatment.

All Greatland directors, officers, employees, consultants and contractors, must comply with this Policy.

This policy also protects those who are entitled to protection under Australian whistleblower laws (see Annexure A of this policy for more detail on these protections).

2. Who may report Reportable Conduct under this Policy?

The protections and procedures in this Policy may be applied to any individual who is (or has been):

- a Greatland director, officer, employee, consultant and/or contractor;
- a supplier of goods or services (whether paid or unpaid) to the Group, including an individual who is or has been employed by such a supplier;
- an associate of Greatland; or
- a relative, spouse or dependant of an individual identified above.

(each, an **Eligible Reporter**).

3. What is Reportable Conduct?

Reportable Conduct (**Reportable Conduct**) includes any misconduct, or improper state of affairs or circumstances in relation to Greatland which an Eligible Reporter has reasonable grounds to suspect is:

- dishonest (including fraud, corruption, bribery, breach of trust and breach of duty);
- illegal (including theft, drug sales/use, violence or threatened violence and criminal damage to property);
- unethical (including practices or representations which amount to improper or misleading accounting or financial reporting practices or wilfully breaching Greatland's Code of Conduct or other policies or procedures);
- any conduct that may indicate a systemic issue in relation to Greatland, including harassment, bullying and/or sexual harassment;
- a contravention of applicable laws or regulations;
- an unsafe work practice which presents a serious health and safety risk or danger to the public; or

- likely to cause material financial or non-financial loss to the Company or that is otherwise detrimental to the interests of the Company.

Reportable Conduct includes conduct of the nature outlined above by a person outside of the Company who has a business connection with the Company (e.g. a supplier, tenderer, contractor, joint venture partner or other business partner) where the conduct could have legal implications for the Company or materially impact the Company's reputation.

4. Personal work-related grievances

Personal work-related grievances are not generally considered Reportable Conduct under this Policy. Personal work-related grievances are issues or concerns which have, or tend to have, implications for the discloser personally, such as matters relating to:

- interpersonal conflict between the discloser and another employee;
- the employment, transfer or promotion of the discloser;
- terms and conditions of employment of the discloser; and
- disciplinary action, or suspension or termination of employment, of the discloser.

If your disclosure is a solely personal work-related grievance, you should make it in accordance with our Grievance Resolution Procedure which is available on the Company's Intranet or by asking your Human Resources representative.

5. Reasonable Grounds to Make the Disclosure

You may still qualify for protection if your disclosure is found to be incorrect, but you must have reasonable grounds to make the disclosure. A deliberate false or malicious report of Reportable Conduct, risks causing serious damage to the reputations of those persons named in the report and to Greatland. If you are unsure whether you have reasonable grounds, you should discuss this with a Greatland Protection Officer.

Any deliberately false or malicious reporting of Reportable Conduct will be treated as misconduct and a breach of this Policy and may be subject to disciplinary action and/or referral to applicable authorities.

6. Who can receive a Speak Up Report under this Policy?

All the people listed in this section can receive disclosures that qualify for protection under the Australian whistleblower laws. However, we encourage you to make your disclosure to our Protection Officers or to the Greatland Speak Up Hotline, which is an external reporting service. Our Protection Officers are Joanne McDonald, Company Secretary & Head of Sustainability and Liz Hodgson, Head of HR, who can be contacted at speakup@greatlandgold.com.

The independent Speak Up service can be contacted by:

Reporting Channels	
URL	https://ispeakup.com/greatland
QR Code	
Phone	1800 950 692 Monday to Friday, 8am to 8pm AEST.
Address	P.O. Box 730, Milsons Point, NSW, 1565
Email	speakup@coreintegrity.com.au

If you prefer, you can instead make a disclosure to the following people:

- any Greatland senior personnel who report directly to the Managing Director;
- General Manager – Telfer;
- HR Superintendent – Telfer
- any other officer (which includes a director or company secretary) of Greatland;
- an internal or external auditor (including a member of an audit team conducting an audit on Greatland); or
- if the disclosure concerns Greatland's tax affairs or the tax affairs of an associate of Greatland: Greatland's registered tax agent or BAS agent, or an officer or employee at Greatland who has functions or duties relating to its tax affairs and who you consider may be assisted in their role by knowing that information.

7. How to make a Speak Up Report

You may make a disclosure at any time to the people and through the reporting channels identified in Section 6.

Information received from an Eligible Reporter will be kept confidential to the extent possible in accordance with this Policy. You can make your disclosure anonymously (and stay anonymous throughout and after any investigation) and still qualify for protection under the Australian whistleblower laws.

Eligible Reporters who do not wish to disclose their identity:

- are encouraged to enable ongoing communication so that the Company may ask follow up questions or provide feedback; and
- may choose not to answer questions that they feel may reveal their identity including during follow up questions.

Eligible Reporters can use the independent Speak Up service to remain anonymous but still engage with the Company in relation to their report. Eligible Reporters are welcome to call the Speak Up service to ask about the options available to them.

While Eligible Reporters can choose to make an anonymous report, the Company encourages Eligible Reporters to disclose their identity so their report can be fully investigated and addressed, and the Company can ensure the person is provided with the support and protections contemplated by this Policy.

You may wish to obtain independent legal advice before making a disclosure. That communication with your legal adviser will also be protected under the Australian whistleblower laws (irrespective of the outcome of that advice).

If you would like to seek additional information before formally making a report you can contact a Greatland Protection Officer for further assistance.

8. Protection and resources

8.1 *Protections from detrimental acts*

All reasonable steps will be taken by the Company to ensure that Eligible Reporters do not suffer detrimental treatment or be disadvantaged and are not subject to any form of victimisation because they have made a report in accordance with this Policy.

Detrimental treatment includes dismissal, injury or harm (including psychological harm), demotion, discrimination, harassment, intimidation, disciplinary action, bias, threats, damage to property, reputation, business or financial position or other unfavourable treatment because the Eligible Reporter made a Speak Up Report. Detrimental conduct does not include the managing of unsatisfactory work performance.

A person who subjects an Eligible Reporter to detrimental treatment because they have made a Speak Up Report will be in breach of this Policy and may be subject to disciplinary action and/or referral to applicable regulators. This is a serious matter which may expose the person to civil and criminal sanctions under applicable laws.

8.2 *Support for Eligible Reporters*

The Company will provide appropriate support to Eligible Reporters. The nature of the support that may be offered will depend on the nature of the Reportable Conduct reported and the personal circumstances of the Eligible Reporter.

If you have any further questions about the support available, you should contact the Greatland Protection Officers.

8.3 *Protection from civil, criminal and administrative liability*

The Australian Corporations Act 2001 (Cth) (Corporations Act) and Taxation Administration Act 1953 (Cth) (Tax Administration Act) provide special protections for Eligible Reporters in respect of disclosures which qualify for protection under those acts. These protections are outlined in Annexure A. The Company is committed to ensuring these legislative protections are complied with.

If you make a Speak Up report under this Policy, you may also be protected from any of the following in relation to your disclosure:

- civil liability – for example, any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation;
- criminal liability – for example, prosecution for unlawfully releasing information or unlawfully using your disclosure against you in a prosecution; and
- administrative liability – for example, disciplinary action for making a disclosure.

However, you may be liable for any misconduct that you have engaged in that is revealed by your disclosure (or revealed by an investigation following your disclosure).

8.4 *Compensation and other remedies*

You may seek compensation and other remedies through the courts if:

- you suffer loss, damage or injury because of a disclosure; and
- Greatland failed to take reasonable precautions and exercise due diligence to prevent detrimental conduct.

We encourage you to seek independent legal advice if you wish to seek compensation or remedies through the courts.

8.5 *Identity protections and exceptions*

The Company is committed to ensuring that Speak Up Reports are managed with appropriate confidentiality and in accordance with statutory confidentiality regimes where applicable.

Subject to compliance with any legal reporting requirements, including requirements to disclose certain information to the Australian Securities & Investments Commission (**ASIC**), the Australian Federal Police or other governmental agencies, when implementing any process under this Policy the Company will:

- not disclose the identity of an Eligible Reporter or information likely to lead to their identification other than in accordance with this Policy;
- ensure that information contained in a Speak Up Report is only disclosed to the extent necessary to conduct an investigation or administer this Policy, or where required for the purpose of obtaining legal advice; and
- take reasonable steps to reduce the risk that the Eligible Reporter will be identified as part of any process conducted under this Policy.

All information received from an Eligible Reporter, as well as the fact that an Eligible Reporter has made a disclosure and any record produced as part of an investigation, is held securely. Access will be restricted to those persons required to access the records for the purpose of this Policy, to administer the Company's information technology platform, or third parties that host these records. By making a report under this Policy an Eligible Reporter consents to their information being recorded and being accessible by these people including their identity (unless the Eligible Reporter elects to remain anonymous).

If an Eligible Reporter chooses to disclose their identity, this information will be provided to the Greatland Protection Officers, and a restricted number of other people, who may be appointed to investigate a report under this Policy, but will not be disclosed to anyone else unless:

- the Company is legally obliged to disclose their identity;
- disclosure is considered necessary to prevent or lessen a threat to a person's health, safety or welfare; or
- the Eligible Reporter consents to the disclosure.

Other than in circumstances required by law, any unauthorised disclosure of information without consent of the Eligible Reporter will be a breach of this Policy and may be subject to disciplinary action and/or referral to applicable authorities. It may also be an offence subject to penalties under the legislation outlined in Annexure A.

Eligible Reporters may make a complaint about alleged breaches of confidentiality by contacting the Greatland Protection Officers, or may lodge a complaint with a regulator.

9. Investigation and review

9.1 *Investigation of Speak Up Reports*

Where a Greatland Protection Officer determines that a Speak Up Report should be subject to investigation, it will be referred to an Investigation Officer who is sufficiently independent of the Eligible Reporter and other persons alleged to be involved in the Reportable Conduct.

In respect of this Policy, the Investigation Officer will have a direct reporting line to the Greatland Protection Officers (other than in relation to reports regarding the Protection Officer) and the Audit and Risk Committee.

All investigations will be conducted in a thorough, fair and timely manner having regard for the nature of the disclosure. Depending on the nature of the disclosurer, the Company will provide updates to the Eligible Reporter (if contactable) as appropriate.

To avoid jeopardising an investigation, an Eligible Reporter is required to keep the fact that they have made a Speak Up Report and the information contained in the report strictly confidential (subject to any legal requirements).

The Company will ensure the fair treatment of employees who are mentioned in a report made in accordance with this Policy, including those who are the subject of a report.

9.2 *Review of investigations*

If the Eligible Reporter is not satisfied with the outcome of the investigation, they may request a separate Investigation Officer to review. However, the Company is not obliged to reopen an investigation or may conclude a review if it finds that the investigation was conducted properly, or new information is either not available or would not change the findings of the investigations.

10. Administration of this Policy

This Policy will be published externally on the Company's website, and internally with the Company's other policies and procedures.

Employees will be required to undertake online training in relation to this Policy as part of the induction process. Employees will be required to undertake a refresher of the online training at least once every two years and will be required to undertake online training for any major amendments associated with this Policy.

The Audit and Risk Committee oversees the operation and implementation of this Policy and will review the Policy periodically. The Board of Directors will be informed of any material incidents under this Policy, including any information that may be materially price sensitive in accordance with Greatland's Continuous Disclosure Policy.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-019	Yes

Annexure A

Protections under the Corporations Act and Tax Administration Act

By making a disclosure in accordance with this policy, you may be protected under the Australian whistleblower laws if the type of matter you disclose is protected by those laws.

While this policy principally deals with internal disclosures, the protections afforded by the Australian whistleblower laws (set out in section 8) also include some types of disclosure made to external parties, such as:

- legal representatives, to obtain advice or representation about the Australian whistleblower laws
- ASIC, APRA or the ATO; or
- MPs or journalists, where you have reasonable grounds to believe that making the further disclosure would be in the public interest or the information concerns a substantial and imminent danger to the health or safety to one or more persons or to the natural environment, but only if:
    - you previously made a disclosure of that information to either ASIC, APRA or the ATO
    - you notified that body in writing of your intention to disclose to an MP or journalist; and
    - you notified that body in writing of your intention to disclose to an MP or journalist
    - (where, for public interest disclosures, at least 90 days must first have passed since your previous disclosure before this notice can be given).

It is important you understand strict criteria apply and you should obtain legal advice before making a disclosure to an MP or journalist.

For more information about the Australian whistleblower laws (including how to make a disclosure directly to ASIC or the ATO), see: the information available on the ASIC website (including Information Sheet 239 How ASIC handles whistleblower reports) and the ATO website.

Workplace Health, Safety and Wellbeing Policy

1. Principle and purpose

Greatland Resources Limited (**Greatland** or the **Company**) accepts its responsibility to take all appropriate measures to provide a safe workplace and system of work for all personnel (**Greatland Personnel**) who work for or on behalf of Greatland or its controlled subsidiaries (**Group**).

Greatland is committed to developing, maintaining and improving standards and work systems and practices to reasonably provide for the physical and psychosocial workplace health, safety and wellbeing (referred to in this policy as workplace health, safety and wellbeing) of Greatland Personnel within the terms of this Policy and any applicable legal requirements.

2. Responsibility of Greatland Personnel

Workplace health, safety and wellbeing is the responsibility of:

- each Greatland Personnel member to themselves;
- each Greatland Personnel member to those around them;
- each Greatland Personnel to the Group;
- the Group to Greatland Personnel by dedicating appropriate resources to creating a work environment in which Greatland Personnel, with the co-operation of other Greatland Personnel in accordance with this Policy, can work, interact and perform their respective roles without undue risk of adverse injury or health outcomes.

Acceptance by Greatland Personnel of their responsibilities under this Policy is a fundamental term of their employment or engagement by the Group.

All Greatland Personnel, including contractors to the Group, and their subcontractors and employees, are expected to observe and comply with this Policy.

3. Objectives and targets

The Group will set objectives and targets with the aim of reducing the likelihood, and severity of consequences, of workplace health, safety and wellbeing risks.

4. Policy strategies

To achieve its commitments, at sites and operations that Greatland controls we will:

- comply with all relevant legislation, applicable standards and guidelines, and all relevant policies and procedures;
- strive for ‘zero harm’ and undertake risk management activities to identify, prioritise and control risks that may negatively impact health, safety and wellbeing in the workplace;

- design, maintain and operate our sites in a manner that minimises or mitigates health, safety and wellbeing risks;
- monitor and measure workplace health, safety and wellbeing performance;
- actively and continuously seek to report and rectify all hazards, non-compliances, near misses, and incidents to provide a safe working environment for Greatland Personnel, including by sharing lessons learned to prevent repeat incidents and reduce future exposures;
- implement and maintain a fit-for-purpose health, safety and wellbeing management system and appropriate work practices;
- promote a 'Fit for Work' culture, under which:
  - work hours, shifts and rosters are monitored to ensure Greatland Personnel are well rested, physically fit, and mentally fit to perform their job at Greatland; and
  - working under the influence of drugs and alcohol is not tolerated;
- actively involve and engage Greatland Personnel and other stakeholders as relevant in the development, implementation and improvement of health, safety and wellbeing standards, procedures and practices;
- provide Greatland Personnel and visitors with the information, instruction, regular training and supervision necessary for their own health, safety and wellbeing and the health, safety and wellbeing of those around them;
- provide Greatland Personnel with the equipment (including personal protective equipment), resources and facilities to ensure that they carry out their duties safely;
- regularly communicate and consult with Greatland Personnel and as appropriate regulators, local communities and other stakeholders on relevant health, safety and wellbeing matters;
- maintain a high level of crisis and emergency preparedness;
- strive to continually improve its health, safety and wellbeing performance; and
- communicate this Policy and report regularly on Greatland's workplace health, safety and wellbeing programs and performance in an open, transparent and accurate manner.

At sites and operations that Greatland has direct interests in, but does not control, to the extent practicable we will seek to use our influence, involvement and decision-making rights to achieve this Policy's objective and strategies.

5. Responsibility for this Policy

All Greatland Personnel and contractors must comply with this Policy and any related policies and procedures. If an individual is in any doubt regarding workplace health, safety and wellbeing matters, they should contact the Health, Safety and Environment Manager.

The Health, Safety and Sustainability Committee, on behalf of the Greatland Board, is responsible for reviewing this Policy and for oversight of Greatland's workplace health, safety and wellbeing practices.

Rev	Prepared	Approved	Issue date	Document number	Public
1.0	Company Secretary	Board of Directors	13 May 2025	GGP-COR-CGO-020	Yes