

HUMAN RIGHTS POLICY

PDI Gold Ltd (ACN 127 171 877)

1. Purpose

PDI Gold Limited (“**PDI Gold**” the “**Company**”) is firmly committed to upholding and advancing human rights throughout all aspects of our operations, business partnerships, and supply chain. This Human right policy (the “**Policy**”) outlines our dedication to respecting internationally recognized human rights and ensures our compliance with applicable regulations. We seek to conduct our business in a manner that promotes dignity, equality, and respect for individuals everywhere we operate.

2. Scope

This Policy applies to all directors, officers, employees, contractors, suppliers, and business partners of the Company. It extends to all operations, subsidiaries, joint ventures, and entities in which the Company holds a controlling interest, regardless of location. We expect our stakeholders to share our commitment and to comply with the principles set out in this policy.

3. Our Commitment

The Company unequivocally respects and supports the protection of human rights and is committed to conducting its business in a manner that upholds dignity, equality, and respect for all people.

We act in accordance with all applicable local and international laws and regulations and, where differences exist between Company policies and local legal requirements, we apply the higher standard.

Our approach is guided by internationally recognised human rights frameworks, including the International Bill of Human Rights, the International Labour Organization’s core conventions, the United Nations Declaration on the Rights of Indigenous Peoples, the OECD Guidelines for Multinational Enterprises, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights, as well as the Australian Stock Exchange (ASX) governance Principles and Recommendations.

In practice, the Company is committed to:

- Prohibiting all forms of modern slavery, including forced, compulsory, child and slave labour, human trafficking, and labour exploitation, across our operations and supply chain.
- Complying with minimum age of employment laws and International Labour Organisation standards, and prohibiting hazardous work for individuals under 18 years of age.
- Providing safe, healthy, and inclusive workplaces that prioritise both physical and mental health and do not tolerate bullying, discrimination, harassment, sexual harassment, or workplace violence of any kind.
- Promoting equal opportunity, diversity, and fair treatment at all levels of the organisation, regardless of gender identity, age, disability, nationality, ethnicity, cultural background, religious belief, sexual orientation, political conviction, union membership, socio-economic background, or other personal characteristics.
- Respecting the rights of Indigenous Peoples and local communities and consulting with at-risk, marginalised, and vulnerable groups that may be affected by our activities, ensuring their perspectives are considered in preventing and mitigating adverse impacts.
- Respecting employees’ rights to freedom of association and collective bargaining in accordance with applicable local laws.
- Recognising and supporting access to fundamental human rights, including access to food, water, shelter, healthcare, education, sanitation, energy, and a clean and safe environment.

- Implementing robust human rights and modern slavery due diligence and risk assessment processes to identify, prevent, mitigate, and remediate adverse impacts in our operations and supply chains.
- Complying with obligations under the Modern Slavery Act 2018 (Cth), including the preparation and publication of an annual Modern Slavery Statement.
- Establishing contractual expectations for suppliers through the Supplier Code of Conduct, requiring adherence to human rights standards and remediation of non-compliant practices.
- Maintaining accessible, confidential, and trusted grievance mechanisms, including internal Speak Up procedures and an independent whistleblower service, and prohibiting any form of retaliation against individuals who raise concerns or participate in investigations.
- Treating all grievances promptly, fairly, sensitively, and confidentially, and providing remediation where the Company has caused or contributed to adverse human rights impacts, without limiting access to judicial or other lawful remedies.
- Immediately suspending or discontinuing engagement with any public or private security providers credibly linked to human rights violations or excessive use of force.
- Embedding accountability for human rights through governance, internal controls, training, and performance monitoring, and measuring effectiveness through key performance indicators and continuous improvement processes.
- Engaging transparently and cooperatively with relevant authorities and stakeholders in relation to any identified or alleged human rights impacts.

The Company adopts the UN Guiding Principles Reporting Framework and reports annually on its human rights performance through its Modern Slavery Policy and Statement.

Any actual or suspected breach of this Policy should be reported to a supervisor, manager, or through the Company's confidential independent whistleblower service.

4. Goals

Our goal is to proactively uphold and respect human rights across all business activities. We strive to continuously improve our practices, foster a culture of accountability, and set industry-leading standards for ethical conduct. The Company is committed to engaging with stakeholders transparently and reporting on our human rights performance, notably in accordance with ASX disclosure requirements.

5. Responsibility

Every individual covered by this policy has a responsibility to uphold human rights in their professional conduct. Management is accountable for integrating human rights considerations into risk assessments, decision-making, and business strategies. All employees, contractors, and partners are expected to understand and comply with this policy and to promptly report any actual or suspected breaches. The Board of Directors provides oversight, ensuring that human rights risks are managed effectively.

6. Related Documents

This Policy should be read in conjunction with the following Company documents, which further detail our ethical, legal, and operational standards:

- Code of Conduct
- Diversity Policy
- Whistleblower Policy
- Supplier Code of Conduct

- ASX Corporate Governance Statement

7. Review of Policy

This Human Rights Policy will be reviewed annually, or more frequently if required, to ensure its ongoing relevance, effectiveness, and alignment with evolving legal requirements, ASX standards, and best practices. Updates and revisions will be communicated to all stakeholders, and training will be provided as necessary to support compliance and awareness.

PDI Gold Limited's commitment to human rights is unwavering. We expect all individuals associated with our Company to share this commitment and to contribute to a respectful, safe, and just business environment.

If you wish to obtain more information regarding any aspect of the Company Code, please ask your manager or consult the Company Secretary at cosec@pdigold.com.

Date Approved	2026-05-27
Owner	Board of Directors