



SANDFIRE RESOURCES NL

Privacy Policy

Sandfire Resources NL
ABN 55 105 154 185

1. Introduction

Sandfire Resources NL (“SFR” or “Company”) is committed to respecting individual privacy and to ensuring the personal information it holds is handled appropriately and lawfully, in accordance with the Privacy Act 1988 as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Clth), and the 13 Australian Privacy Principles from Schedule 1 of the Act.

Personal information is information relating to an individual whose identity is apparent or can be reasonable ascertained from the information provided.

For a full copy of the Privacy Policy, please contact the Privacy Officer whose details can be found at the end of this document

2. Collection of personal information

Sandfire will only collect personal information that is necessary to carry out the functions and activities of Sandfire.

For example, we may collect personal information:

- in the course of carrying out employee-related activities such as training and consulting;
- about individuals seeking employment with Sandfire;
- to provide you with a product or service;
- to conduct credit checks and assess credit worthiness;
- to manage our relationship with you, either as a customer, shareholder or other stakeholder;
- to comply with our legal and regulatory obligations; and
- for other purposes required or authorised by law, including purposes for which you have provided your consent.

2.1 Customers and potential customers and suppliers and potential suppliers

As a customer or potential customer and supplier or potential supplier, we may collect your name, current address, telephone number, email address and credit history. We may also collect details of other interactions that you have with us, together with any other information that you choose to provide us with.

We may use the information provided to conduct a credit assessment of you and use information we are permitted by law to use and to establish or report on your credit worthiness.

In line with modern business practices common to most companies and to meet your specific needs, we may disclose your personal information to third parties. Some of these third parties act on our

behalf, and if this is the case we ask that these third parties hold, use and disclose your personal information in accordance with the Privacy Act.

These third parties may include:

- financial institutions for payment processing;
- credit reporting agencies and credit providers;
- government and regulatory authorities, where required or authorised by law; and
- external business advisors (such as accountants, auditors, recruiters and lawyers).

2.2 Shareholders

If you are a shareholder, the Corporations Act requires us to collect information about your name, address and shareholding, and include these in our register, held by Security Transfer Registrars Pty Ltd. This information will continue to be included in the register for seven years after you cease to be a shareholder.

The Corporations Act also requires us to grant access to anyone to inspect our share register on request and under certain circumstances, to obtain a copy. We may provide information from the share register to meet specific requests, such as identifying the top 20 shareholders. Shareholder information will not be knowingly disclosed for purposes other than those which we consider to be in the best interests of shareholders.

As shareholders, you may also be required to provide us with your tax file number or financial institution account details. When applicable, we may ask for your bank account details to make dividend and other payments to you. In compliance with Australian tax laws, we also provide certain advice to the Australian Tax Office, including dividend information.

Under the Money and Laundering and Counter Terrorism Financing Act 2006 (Cth), our share registry may collect personal information about you (such as your legal name and other names you may be known by, your residential street address and your date of birth) and hold other documents in order to verify your identity. This information is generally not included in the public register and is restricted to authorised share register employees, Sandfire and regulators.

You can view a copy of Security Transfer Register's privacy policy at the following link:

<https://www.securitytransfer.com.au/privacy.cfm>

2.3 Employment

a. Job applicants

If you are applying for a position with us, we will ask you specific personal information, such as your name, e-mail address, telephone number, qualifications and career history. We may also ask you for other information such as your interests and the positions you are interested in.

Any personal information you provide Sandfire in connection with a job application may be used to consider you for current and future employment and may be disclosed to our external advisors to assist in the selection and recruitment process.

b. Employees

If you are an employee of Sandfire, we will collect employee records and personnel files, referee reports and other information. The handling of your personal information as an employee is exempt from the Privacy Act if it is directly related to your current or former employment relationship or an employee record relating to you. We will not disclose your personal information for any purpose, other than required by law.

In certain circumstances Sandfire may collect sensitive information or health information about employees. We will collect this information under the following circumstances:

- when it is provided voluntarily by the individual/employee to which it relates and that individual has consented to the collection of that information; or
- where we are otherwise authorised by law to collect that information.

3. How we collect personal information

We may collect information in a number of ways, including:

- directly from you, including through our website, by telephone, through written correspondence (such as letters and emails), and in person if you visit our share registry;
- from credit reporting agencies and from the third parties; and
- from publicly available sources of information, such as address validation software and telephone directories.

When collecting personal information, Sandfire will take reasonable steps to ensure individuals/employees are aware of the following:

- why we are collecting the information;
- any laws requiring the collection of that information;
- who we usually disclose the information to;
- any consequences for the individual/employee if we are not provided with the information; and
- through our website.

3.1 Information collected through our website

If employees/individuals access www.sandfire.com.au (the "Website") our system may record information including but not limited to the following:

- the date and time of your visit to the Website; and

- the pages accessed and any information downloaded.

This information may be used for statistical and reporting purposes as well as for website administration and maintenance.

The personal information which Sandfire may collect through the Website includes:

- any messages or comments a website user leaves for Sandfire via the Website, eg through use of the “Contact Sandfire” icon; and
- information provided by a website user when applying for a job at Sandfire via the Website.

4. How we use your personal information

Sandfire may use and disclose the personal information we collect for the following purposes:

- to carry out the activities and functions of Sandfire;
- to maintain our relationships with employees/individuals;
- for planning, research, security or risk management purposes;
- where a third party acquires or makes inquiries in relation to acquiring an interest in Sandfire;
- to the extent that Sandfire is required or authorised to do so by law; and
- for purpose related to any of those listed above.

We may also use personal information to keep employees/individuals informed of our activities, events, ASX announcements and other matters including by e-mail or other electronic form. If employees/individuals do not wish to be contacted for those purposes, please inform Sandfire of this using the contact details given below.

Some of this information may include sensitive information, including health, racial or ethnic origin information, and will only be used for compliance with applicable laws and regulations including workplace and equal opportunity laws.

Sandfire may share personal information where permitted by law with other Sandfire offices and with third parties including our business and joint venture partners. We may also use or disclose personal information where required or authorised by law, such as in emergency situations and when assisting law enforcement agencies.

5. Cross Border Disclosures

As Sandfire has interests in operations in Canada and U.S.A, Sandfire may disclose personal information to recipients in one or all of those countries, although such information will typically only relate to employees and internal corporate matters as required as part of Sandfire’s business operations.

Sandfire will take commercially reasonable steps to ensure that overseas recipients will deal with such information in a way that is consistent with the Australian Privacy Principles.

6. Accessing and updating personal information

If an employee wishes to seek access to or request correction of any personal information held by Sandfire about the employee, Sandfire encourages that employee to contact a member of our human resources department who will make the change/provide the information where required. Sandfire may charge a fee for the provision of this access.

In certain circumstances, Sandfire may be permitted by law to refuse access to personal information or refuse to correct or alter that personal information. If that is the case, Sandfire will give the individual/employee concerned reasons for the decision not to provide/correct the information.

Sandfire will take all reasonable steps to make sure that the personal information we collect, use, and disclose is complete, accurate and up-to-date.

7. Security of personal information

We store information in different ways, including hard copy and electronic form. We have implemented controls around technology and our organisation processes to assist us in protecting your personal information. This includes having in place confidentiality requirements from our employees, document storage security policies, systems and site access restrictions and requiring third parties to satisfy identification requirements.

We expect all of our employees and contractors to comply with the Privacy Act 1988 and our Privacy Policy and will take appropriate actions to address breaches by employees and contractors of the obligations imposed by the Privacy Act 1988 and the Policy. However we do not accept responsibility for the misuse of personal information by third parties.

No data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect users' personal information, we cannot guarantee or warrant the security of any information transmitted to it and users do so at their own risk. Once we receive your information, we make every effort to ensure its security on our systems. If you are concerned about sending your information over the internet, you can contact us by telephone, email or post.

Sandfire will take all reasonable steps to protect the personal information in our possession (be that stored electronically or in hard copy form) from misuse, unauthorised access, loss, modification or disclosure.

Where Sandfire no longer requires the personal information of an employee/individual for one of the purposes outlined above, Sandfire will take reasonable steps to destroy that information.



8. Privacy queries and Complaints Procedure

If you have any questions or complaints about privacy or about the way in which Sandfire handles your personal information, you may contact the Sandfire Privacy Officer.

If a complaint is made, please include your name and contact details such as an email, address and telephone number and clearly describe the complaint. The Sandfire Privacy Officer will investigate the complaint and respond promptly.

If the complainant considers that Sandfire has failed to resolve the complaint satisfactorily, the complainant can complain to the Office of the Australian Information Commissioner.

Our Privacy Officer can be contacted on the following details:

Attention: Robert Klug
Address: Sandfire Resources
Level 1, 31 Ventnor Avenue
West Perth WA 6005
Phone: (+61 8) 6430 3800
Email: admin@sandfire.com.au