



PRIVACY POLICY

Our Commitment

Sandfire Resources Limited (**Sandfire**) is committed to protecting the privacy of individuals and ensuring the personal information we hold is processed appropriately and in accordance with our legal obligations, such as those arising under the *Privacy Act 1988* (Cth) (**Privacy Act**), and the *General Data Protection Regulation* (EU) 2016/679 (GDPR).

Overview

This policy outlines how Sandfire processes the personal information of individuals that interact with Sandfire, including our suppliers, customers, investors, job applicants, employees, and users of our website. This includes an overview of the types of personal information we collect, how and why we collect it, who we share it with and your rights to access and correct it or make an enquiry about how we process it.

For the purposes of this policy, 'personal information' is any information which is related to an identified or identifiable natural person.

If you have any questions about this policy, please contact our Privacy Officer using the contact information included below.

How we achieve our commitment

Collection of personal information

Sandfire will only collect the personal information that is reasonably necessary to carry out its business functions and operations, and as required by legal and regulatory obligations.

To establish and maintain our commercial relationships, it is essential for certain parties to provide the personal information we require for initiating, managing and concluding such relationships. Without this information, we may be unable to proceed with the relevant business, employment or other commercial engagement with you. Please see Appendix A for a list of the types of personal information we collect.

How we collect personal information

We collect personal information in several ways, including:

- **Directly from you** when you send us information about you, such as when you visit our website, subscribe to our 'Email Alerts' service (available on our website), request information from us, and when you contact us through our 'Enquiry' form (available on our website), by telephone, through written correspondence (such as letters and emails), and in person if you visit our sites or our share registry.
- **Indirectly from your interactions with us** such as by monitoring your use of our website, your interactions with our IT devices, and video footage of your activities on our worksites captured by CCTV.
- **From third parties** such as credit reporting agencies, background check providers, recruitment agencies, address validation providers, stockbrokers and due diligence screening databases.

How we use and disclose your personal information

We will only use and disclose your personal information for the purposes for which we originally collected it, unless we reasonably believe we need to use it for another reason which relates to the original purpose of collection, or where you have provided consent, or where we are required to do so by our legal and regulatory obligations (such as in emergency situations and when assisting law enforcement agencies).

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If we are processing your personal information based on the consent you have provided to us, this consent can be withdrawn at any time by using the contact details in the 'Privacy Queries and Complaints' section below.

Please see Appendix B for how we use your personnel information.

Who we share your personal information with

To maintain efficient business operations and for the purposes described in the 'How we use your personal information' section of this policy, we may share the personal information we hold with other entities.

Sharing of information within Sandfire

The information you provide to us (including sensitive information) may need to be accessed by other entities within Sandfire as part of our ongoing business operations. Sharing of information within Sandfire is governed by a data transfer agreement that we have in place with all relevant Sandfire entities.

As Sandfire has operations in a number of international locations (currently including Australia, Spain, Botswana, the United Kingdom, Portugal and the United States of America) Sandfire may make the personal information we hold accessible to specified recipients in one or all of those countries, although such information will typically only relate to our personnel and internal corporate matters.

An overview of Sandfire and the countries in which we operate is set out in Sandfire's Annual Report available on our website.

Sharing of information outside Sandfire

We may also share your personal information outside of Sandfire to third parties, including:

- Parties you have authorised to interact with us on your behalf (such as recruitment agencies and unions).
- Third-party service providers who we have engaged for support in our business operations for certain services (including human resources, health and medical support (including emergency response services), information technology and security, share registry services and other services).
- Prospective purchasers of all or part of our business (where relevant).
- Our professional advisors (such as our lawyers and accountants).
- When you provide your consent to share your information (such as when you make a written request that requires us to share your information with a third party).
- Government authorities or other persons where we are obliged to share information by an applicable law.

Sharing of information with overseas recipients

From time to time we may need to make your personal information accessible to our service providers or business partners who may be located outside of Australia. We may also make other disclosures of your personal data overseas in the event we receive a legal or regulatory request from a foreign government agency.

If we need to disclose personal information to third parties in a different country from which the information was collected, we will take steps to ensure there is a lawful basis for the disclosure and that the disclosure complies with all applicable laws. This may include entering into a legally binding contract with the recipient under which they are obliged to process your information with appropriate confidentiality and in accordance with applicable laws.

Any requests for information we receive from foreign law enforcement agencies or regulatory bodies will be carefully reviewed before any personal information is disclosed.

Accessing and updating personal information

If an employee, contractor or officeholder wishes to seek access to or request correction of their personal information held by Sandfire, Sandfire encourages you to contact a member of our human resources department who will make the change/provide the information where required.

If a member of the public wishes to seek access to or request correction of their personal information held by Sandfire, these requests must be made to our Privacy Officer using the contact details provided below (in the 'Privacy Queries and Complaints' section of this policy).

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In order to respond to your request, we may require verification of your identity.

There is no fee to submit a request for access to or alteration of your personal information, however, if fulfilling your request involves a substantial diversion of resources, we may charge you a reasonable fee.

In certain circumstances, Sandfire may be permitted by law to refuse access to or alteration of personal information. If that is the case, Sandfire will give the requesting party the reasons for the decision.

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

Other rights of certain individuals

Note: This section applies only to your interactions with Sandfire subsidiaries based in Member States of the European Union.

In addition to the right to request access to or correction of personal information held by Sandfire (detailed above), you also have the following additional rights:

- Right to request further information about how your personal information has been processed by us (Article 15 GDPR).
- Right to request the erasure of your data held by us (Article 17 GDPR).
- Right to restrict the processing of your data (Article 18 GDPR).
- Right to data portability (Article 20 GDPR).
- Right to object to the processing of your personal information (Article 21 GDPR).

Right to request further information (Article 15 GDPR)

In addition to the right to access and correct information noted in this policy, the GDPR provides you with the right to request further clarification on how your personal information is processed.

This includes:

- The purposes for which your personal information is being processed.
- The recipients or categories of recipients to whom your personal information has been or will be disclosed.
- The planned retention period for your personal information.
- The existence of a right to rectification or deletion of personal data concerning you.
- All available information about the origins of the personal information we hold about you if it was not collected from you.
- The existence of automated decision-making involved in the processing of your personal information (as defined in Article 22 of the GDPR) and meaningful information about the logic involved and the scope and intended effects of these processes.

If your personal information has been transferred to another country, you have the right to request information about the relevant safeguards that have been implemented to protect your privacy as applicable to the transfer of information (Article 46 GDPR).

Right to request erasure (Article 17 GDPR)

You have the right to request that we delete the personal information we hold about you immediately if one (or more) of the following reasons applies:

- The personal information is no longer necessary for the purposes for which it was collected or otherwise processed.
- You withdraw your consent and there is no other legal basis to continue processing the information.
- You object to the processing under Article 21 (detailed below) and there are no overriding legitimate grounds for the processing.

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- The personal information is being processed unlawfully.
- The deletion of personal data is necessary to comply with an applicable legal obligation.
- The personal data was collected in relation to the offer of information from 'information society services' referred to in Article 8 of the GDPR.

Where your personal information has been included in a publicly available publication by Sandfire or its subsidiaries, we will take appropriate measures, taking into account the available technology and the implementation costs, to inform the third parties processing your information that you also request them to delete all links to or copies of your personal information.

Right to request restriction of processing (Article 18 GDPR)

You have the right to request that we restrict the processing of your personal information if one (or more) of the following conditions applies:

- You dispute the information's accuracy.
- The processing is unlawful, and you oppose the erasure of your personal information.
- We no longer need the personal information, but you need us to continue holding it to assert, exercise or defend legal claims.
- You have objected to the processing in accordance with article 21 and it is not yet clear whether our legitimate grounds to process the data outweigh your rights and interests to restrict the processing of the information.

Right to data portability (Article 20 GDPR)

You have the right to request copies of your personal information in a structured, commonly used and machine-readable format, and you have the right to transmit this data to another controller without hindrance from us, provided both of the following conditions are met:

- The processing is based on consent or on a contract.
- The processing takes place using automated means.

When exercising your right to data portability, you have the right to have the relevant personal information transmitted directly from us to another party (to the extent this is technically feasible).

Right to object (Article 21 GDPR)

Under certain conditions (detailed in Article 21 of the GDPR) you can object to the processing of your personal information by us. This general right applies to processing activities based on our legitimate interests. We are only obliged to implement such a general objection under certain circumstances (detailed in Article 21 of the GDPR).

Security of personal information

Sandfire will take all reasonable steps to protect the confidentiality, integrity and availability of personal information in our possession (stored electronically or in hard copy form).

We have implemented controls around our technology and information handling processes to assist us in protecting your personal information. This includes having in place confidentiality requirements from our employees, contractors and third-party service providers, document storage security policies, utilising secure systems for data storage and transmission, implementing site access restrictions and requiring third parties to satisfy identification requirements.

Sandfire's aim is to keep your personal information for no longer than is necessary to comply with our legal obligations or for the purposes described above. Our document retention and disposal procedures extend to records that include personal information.

Privacy queries and complaints

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

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Please include your name and contact details (such as an email address and telephone number) and clearly describe your request or complaint.

If you have made a complaint, the Sandfire Privacy Officer will investigate the complaint and respond promptly. We will endeavour to respond to all privacy enquiries and complaints within a reasonable timeframe.

Our Privacy Officer can be contacted using the following details:

Attention	Privacy Officer
Address	Sandfire Resources Limited Level 2, 10 Kings Park Road West Perth WA 6005
Email	privacy@sandfire.com.au

If your complaint relates to the processing of your personal information by a Sandfire subsidiary based in a Member State of the European Union, you also have the right to lodge a complaint with the responsible data protection supervisory authority at any time. To do this, you can contact the data protection supervisory authority of the Member State in which you live or the authority of the Member State in which the relevant Sandfire subsidiary is based.

If your complaint relates to Sandfire's Australian operations, you can complain to the Office of the Australian Information Commissioner (**OAIC**) by following the instructions on their website.

Changes to this policy

We may change this policy periodically as the way we operate changes over time. If we propose to change this policy, we will display a notice on the 'Privacy Policy' page of our [website](#).

Responsibility and accountability

This policy applies to all Sandfire (including all subsidiaries within the Group) directors, employees, suppliers and contractors.

The CEO of Sandfire is accountable to the Board for ensuring this policy is implemented and adhered to.

Approved by the Sandfire Resources Limited Board on 17 July 2024.

Appendix A – Collection of personal information

1 Customers, Potential Customers, Suppliers and Potential Suppliers

As a customer, potential customer, supplier, potential supplier, or a representative of the same, we may collect the following information about you:

- **Contact information** such as names, job title, current address, telephone number (mobile and/or landline), business phone number, business email address, and business mailing address.
- **Identification information** such as driver's licence details (or other government-issued identification) and vehicle registration details for site access and contractor management.
- **Financial information** such as banking details, tax identification numbers, credit history (for assessing the creditworthiness of entities where relevant), and other financial information relevant to billing and transaction management.
- **Transaction information** such as records of past purchases relevant to Sandfire.
- **Emergency contact information** for individuals who will be present at certain Sandfire work sites.
- **Any other information** you provide us such as the information included in your communications to us.

The legal bases for these processing operations are as follows:

- **To fulfill contractual obligations** such as the implementation of pre-contractual measures, managing customer and supplier relationships, processing payments, and delivering product as agreed upon. This is necessary to properly execute contracts or to take any required steps before entering into a contract or a transaction.
- **To meet legal obligations** such as obligations to verify the identities of transaction counter-parties, and to ensure compliance with taxation, environment, and health and safety obligations.
- **For our legitimate interests** such as conducting credit checks to establish the creditworthiness of relevant entities, to ensure the security of our operations, facilities, and IT infrastructure, to communicate with customers, suppliers, and other business partners about ongoing projects, or to manage and defend our interests in the event of a dispute or court action. Processing under this basis is done where an activity is necessary for the purposes of our legitimate interests or those of a related third party, except where such interests are overridden by your interests or fundamental rights and freedoms.
- **Based on your consent** by subscribing to our 'Email Alerts' service on our website, we may process your personal information to send you newsletters and other marketing communications we believe might be of interest to you. This consent can be withdrawn at any time by unsubscribing from our 'Email Alerts' on our website.

We may also collect details of other interactions you have with us, such as details of your access and attendance at Sandfire's sites and premises, together with any other information you choose to provide us with.

2 Shareholders

As a Sandfire shareholder, we or our share registry on our behalf, may collect the following information about you:

- Personal information such as your name, address, email address and telephone number.
- Other personal information to verify your identity such as date of birth and identification documents.
- Shareholder information such as details of the categories and classes of shares you hold, the identification number given to you as a Sandfire shareholder and information about any votes you cast.
- Any other information you provide such as the information included in your communications to us.

The *Corporations Act 2001* (Cth) (**Corporations Act**) requires us to include certain information in our share register. We engage a share registry service provider to manage and maintain our shareholder records, process share transactions, distribute dividends, and facilitate communication with shareholders. This information is

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generally not included in the public register and is restricted to authorised share registry employees, Sandfire personnel and applicable regulatory authorities. The information in our share register will continue to be held in the register for seven years after you cease to be a shareholder in accordance with regulatory requirements.

The legal basis for these processing operations is to enable Sandfire to meet its legal and regulatory obligations arising from relevant securities, corporate governance and financial reporting obligations (such as the Corporations Act), and as part of our legitimate interests to enable us to manage your shareholder interest in Sandfire.

3 Employment

Job applicants

If you are applying for a position with us, we may collect the following personal information:

- **Contact information** including your name, current address (where this is provided by you), telephone number and email address.
- **Qualification information** including information about your employment history, technical abilities, education history, certifications or licences held and other qualifications.
- **Information provided during the recruitment process** including cover letters and resumes.
- **'Right to Work' information** including the information required to verify your identity and eligibility to work for Sandfire in the relevant jurisdiction, including your citizenship information, visa status, and/or relevant work permits.
- **Results of clearance checks** including criminal history and identity checks. This includes wider-ranging background checks for senior roles and officeholders, such as employment history verification, insolvency checks, politically exposed person and other compliance checks.
- **Assessment outcomes** including results from any tests or assessments administered during the application process, including evaluations of technical skills, personality traits, and cognitive abilities.
- **Demographic information** used for diversity and inclusion purposes, such as gender and ethnicity (only collected when voluntarily provided by you or where required by local legal or regulatory obligations).
- **Health information** where relevant to your employment with Sandfire, including information about relevant pre-existing injuries and results of drug tests.
- **Any other information you provide us** during the recruitment process, such as the information included in your communications to us.

The legal basis for these processing operations is to enable Sandfire to meet its employment, equal opportunity and workplace health and safety regulatory obligations, and for our legitimate interests, including to assist us in making a decision about your suitability for recruitment or appointment to a position and the terms of the relevant engagement.

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

We may also contact your nominated referees to collect information about your employment history where you have provided us consent to do so.

Employees, contractors and office holders

If you are a Sandfire employee, contractor or office holder, we may collect the following personal information (depending on your role):

- **Payroll information** including bank accounts, payroll records, tax status information, salary and other payments made, attendance and leave data.
- **Contact information** such as your name, current address, telephone number (mobile and/or landline), email address and emergency contact information (such as next of kin).

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- **Employment administration information** as required to administer the ongoing employment relationship, including details and location of your role, information relating to your performance, training completion data, content of relevant disciplinary and grievance procedures, and any information required to monitor compliance with and enforce our policies.
- **Workplace data** such as CCTV footage collected on Sandfire sites and access card records.
- **Interactions with Sandfire IT resources** including activity on Sandfire IT devices, interactions with Sandfire data, voicemails, e-mails, correspondence, documents, and other data or products created, stored or transmitted for purposes related to your employment.
- **Health information** such as health and sickness records, accident records, first aid records, results of drug tests, injury at work information and third-party accident information.
- **Trade union membership** information including information required for the purposes of membership subscription deductions and remittances and facilitation of employee representation by the relevant union.
- **Racial or ethnic origin** information such as gender and ethnicity (only collected when voluntarily provided by you) for internal reporting purposes specifically workforce demography by region of origin to highlight extent of local community empowerment/impact or where required by local legal or regulatory obligations such as for diversity reporting or equal opportunity laws.

The legal basis for these processing operations is to enable Sandfire to meet its legal and regulatory obligations relating to employment, workplace health and safety, and equal opportunity regulations, and for our legitimate interests to enable us to effectively manage the employment relationship or the applicable contract for service.

We reserve the right to monitor employee, officeholder and contractor use of our equipment and IT devices and assets to ensure the safety of our personnel, monitor compliance with our policies and standards, and the protection of our intellectual property. Such monitoring may result in the inadvertent collection of your personal information.

4 Sensitive information

Certain types of personal information are considered to be more sensitive than others under privacy laws. These types of information are called 'sensitive information'. Depending on the applicable jurisdiction, 'sensitive information' may include information about your race or ethnic origin, political opinions, religious beliefs, criminal history, health or medical information including genetic and biometric information, sexual orientation and trade-union membership.

In certain circumstances, we may be required to collect sensitive information, such as during recruitment processes or when managing health and safety issues. We only collect sensitive information when you have consented to its collection, or where we are required to collect the information to meet our legal and regulatory obligations.

5 Website visitors

We use cookies on our website. Cookies are small pieces of data stored on the web browser used by your device when you visit a website. We use cookies for our website functionality, analysis (for example, we use Google Analytics to understand how visitors engage with our website) and to improve your browsing experience.

In addition, we share information about the use made of our website with our partners from social media, advertising and web analysis, who may combine it with other information provided to them or that they have collected based on the use made of their services.

You can disable our cookies although this may disable some features of our online services.

Depending on the cookie settings selected by you, we may collect information about your mobile device for system administration purposes and to evaluate our website's effectiveness. Our cookies may record information about your interactions with our website, including (but not limited to) the date and time of your visit to our website, the pages accessed, and any information downloaded.

Appendix B – How we collect and use your personal information

1 Customers and potential customers, and suppliers and potential suppliers

Sandfire may use and disclose the personal information we collect relating to customers, potential customers, suppliers and potential suppliers for purposes that form part of Sandfire's business operations, including:

- **Regulatory compliance** such as ensuring adherence to environmental, safety, corporate governance and employment regulations and regulatory data reporting regimes.
- **Risk management** including assessing and mitigating operational risks including those related to financial, environmental, corporate governance and safety concerns.
- **Customer relationship and supply chain management** including communicating and managing relationships with customers and suppliers to facilitate relevant business operations.
- **Strategic planning** including analysing relevant markets, potential expansions or diversification operations.
- **Financial analysis and reporting** such as budgeting, financial forecasting, and investment management to secure Sandfire's financial health.

2 Shareholders

Sandfire may use and disclose the personal information we collect relating to shareholders for the following purposes that form part of Sandfire's investor relations operations, including:

- **Verifying shareholder identities** and the validity of shareholder information to enable us to maintain an accurate shareholder register and conduct accurate security checks.
- **To communicate with you** about shareholder-related information (including information about shareholder payments, periodic reports, notice of our AGMs and any other information that is relevant to your interest in Sandfire).
- **To respond to enquiries and requests** you may raise with us in your capacity as a shareholder (or to otherwise service your needs as a shareholder).
- **To meet our legal and regulatory obligations** including those relating to corporate governance and taxation.

The Corporations Act also requires us to grant access to anyone to inspect our share register on request and, under certain circumstances, to provide requestors with a copy of the register. We may provide information from the share register to meet specific requests, such as identifying the top 20 shareholders. Shareholder information will only be disclosed when required by legal and regulatory obligations or when deemed to be in the best interests of our shareholders. In compliance with Australian tax laws, we also provide certain information to the Australian Tax Office, including information relating to dividends.

3 Employment

Applicants

Sandfire may use and disclose the personal information we collect relating to job applicants for purposes including:

- **Assessing the suitability of candidates** for the relevant roles Sandfire has available.
- **Verifying the identity** of applicants and the accuracy of the information provided by applicants.
- **Performing background checks**, including criminal history checks, past employment checks, qualification checks and 'Right to Work' checks.
- **Communicating with applicants** throughout the recruitment process on the progress and success/failure of their application.
- **Compliance with employment** and equal opportunity laws.

Some of this information may include sensitive information, including health, racial or ethnic origin information, which will only be used for compliance with applicable local legal and regulatory obligations, such as diversity reporting and equal opportunity laws.

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Employees

Sandfire may use and disclose the personal information we collect relating to employees for the purpose of administering the employee-employer relationship, including:

- **Payroll administration** such as payroll processing and taxation administration.
- **Legal and regulatory compliance** including ensuring ongoing suitability for work in the relevant jurisdictions and complying with health and safety obligations.
- **Performance and career development** including assessing performance, managing training, and educational development.
- **Monitoring policy compliance** including monitoring the use of information and communication systems to ensure compliance with IT policies and maintaining network security.
- **Employee relations and workforce monitoring:** Managing disciplinary and grievance processes, overseeing legal disputes, monitoring compliance with equal opportunities standards and legal and regulatory obligations, and analysing data to assist with workforce planning.

Some of this information may include sensitive information, including health, racial or ethnic origin information. We may use employees' sensitive information in the following ways:

- **Information about leave**, including information about sickness-related absences or family-related leave, is used for workforce management and may be used for compliance with employment and health and safety laws.
- **Information about your physical or mental health** may be used to ensure your health and safety in the workplace, to assist in the assessment of your fitness to work and to provide appropriate workplace adjustments.
- **Information about your racial or ethnic origin** may be used for internal reporting purposes specifically workforce demography by region of origin to highlight extent of local community empowerment/impact or where required by local legal or regulatory obligations such as for diversity reporting and equal opportunity laws.

We may also use or disclose personal information (including sensitive information) where required or authorised by our legal and regulatory obligations, such as in emergency situations and when assisting law enforcement agencies.