BULLYING AND HARASSMENT POLICY

Purpose

KGL Resources Ltd (**KGL**) is committed to providing a healthy and safe work environment which is free from bullying and harassment, including sexual harassment. KGL will not tolerate bullying or harassment in the workplace.

All Workers who, in good faith, make a complaint or are a witness to bullying or harassment are protected against victimisation.

This Policy applies to people carrying out work for KGL Resources (**KGL**), including as officers, employees, volunteers and contractors (**Workers**).

Bullying and Harassment Definitions

Bullying

Bullying occurs where a person repeatedly behaves unreasonably towards a Worker or group of Workers at work and the behaviour creates a risk to health and safety. Examples of workplace bullying include:

- teasing, insulting or name calling;
- exclusion from work activities;
- unwarranted criticism or ridicule, including in front of other Workers;
- spreading of malicious gossip about a person;
- failing to respond to requests for assistance, or unreasonable delays in responding to queries or concerns.

Bullying is not a reasonable management action carried out in a reasonable manner.

Sexual Harassment

A person sexually harasses another person (the person harassed) if:

- the person makes an unwelcome sexual advance, or an unwelcome request for sexual favours, to the person harassed; or
- engages in other unwelcome conduct of a sexual nature in relation to the person harassed;
- in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Examples of sexual harassment include innuendos or crude jokes (in person or by email/text), displaying or sharing offensive material in the workplace, and displays of sexual conduct.

Bullying and Harassment Objectives

KGL is committed to and accountable for:

- Ensuring all Workers have a right to work in an environment free from bullying and harassment, and to be treated with dignity and respect.
- Ensuring all Managers and Supervisors are responsible for actively intervening to prevent and stop any bullying or harassment behaviour that is occurring, whether or not a complaint is received.
- Implementing and communicating procedures by which Workers can make complaints about bullying and harassment.
- Managers taking reasonable steps to ensure that any potential breaches of this Policy are identified, taken seriously and acted upon appropriately and in a timely manner.

KGL Workers are accountable for:

- Complying with this Policy, as amended from time to time, and all relevant laws and regulations.
- Ensuring that they do not engage in or encourage other Workers to engage in workplace bullying and/or harassment behaviour.
- Implementing and communicating procedures by which all Workers can have any complaint of workplace bullying or harassment addressed.
- Ensuring they understand the complaints procedure and use it where appropriate.
- Ensuring all complaints about bullying or harassment are be treated in a sensitive, equitable and confidential manner.
- Promptly report any incidents of bullying and/or harassment experienced or witnesses to their manager
- Understanding this Policy and seeking clarification from management where necessary.

In addition to obligations of Workers, Managers are expected to promote this Policy within their area of Responsibility and take steps to ensure that any breaches or potential breaches of this Policy or relevant laws are identified, taken seriously and acted upon appropriately and in a timely manner.

Appropriate Action

Any Worker found to have engaged in bullying or harassment behaviour may be subject to disciplinary action, up to and including termination of their employment without notice or ending of their engagement with KGL. The appropriate action will be determined on the particular circumstances.

In the event that a breach of this Policy constitutes a breach of any laws or regulations, KGL may report the breach or enforce the relevant legal right or entitlement, whether on its own behalf or on behalf of a KGL Worker (to the full extent permitted by law).

This Policy has been approved by the Board of KGL Resources Ltd.

11 August 2025

