



Our commitment

Sandfire Resources Limited (**Sandfire**) is committed to fostering a culture of ethical behaviour and good corporate governance and our values of Honesty, Respect, Performance, Accountability and Collaboration are part of every decision we make. Sandfire does not tolerate corruption or bribery in any form and we are committed to complying with applicable laws and regulations in every country in which we operate.

This Business Conduct Policy supports our Code of Conduct, which is available **here** and which applies to all our people.

How we achieve our commitment

We will seek to deliver on our commitment through the application of the following policy principles:

- Never paying, soliciting or accepting bribes, making of political donations, engaging in any other kind of corrupt practice or contravening anti-money laundering/terrorist financing, sanctions or anti-competition laws.
- Embedding standards and risk-based controls to mitigate business conduct risks associated with activities involving third parties. These include, but are not limited to:
 - Anti-Bribery and Corruption
 - Anti-Money Laundering and Counter-Terrorist Financing
 - Competition and Anti-Trust
 - Conflict of Interest; and
 - Sanctions and High-Risk Jurisdictions
- Providing a leadership endorsed business conduct education and awareness program to all employees.
- Confidential issues reporting processes, including an anonymous reporting service, are communicated and accessible.
- Business conduct controls are regularly monitored to assess effectiveness and compliance with our Code of Conduct, this Policy and applicable Standards, laws and regulations.
- Ensuring that our people are provided with the necessary tools, authority and information to enable them to discharge their responsibilities in an ethical, respectful and compliant manner.

Responsibility and accountability

This policy applies to all Sandfire directors, employees, contractors, agents and other business associates.

All Senior Leaders within Sandfire are accountable for the provision of adequate and appropriate resources to enable compliance with this Policy.

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

Approved by the Sandfire Resources Limited Board on 28 May 2024.