



CONFIDENTIALITY AND PRIVACY POLICY

1.0 Overview

Minjar Gold considers its business knowledge and records to be confidential and proprietary information and expects persons with access to that information to protect the confidentiality of that information.

Minjar Gold has an obligation to protect the privacy of its staff and manage personal information in a responsible manner.

This policy outlines what should and should not be done with confidential or private information, and the consequences of unauthorised use or disclosure of confidential or private information.

2.0 Objectives

The objectives of this policy are to provide guidance on what is confidential and private information and how it should be dealt with by persons with access to that information.

3.0 Application

This Policy applies to the following persons who will be referred to as Workers for the purposes of this Policy:

- Employees of Minjar Gold Pty Ltd, its Australian subsidiaries and employees working on Operations that are managed by Minjar Gold Pty Ltd (referred to as Minjar Gold).
- contractors and subcontractors; and
- any other persons on Minjar Golds premises with access to Minjar Golds Confidential or Private Information.

4.0 Guidelines

4.1.1 *Personal information*

The following are examples of 'private information' that Minjar Gold may hold from time to time, and which are to be treated as private and personal and cannot be disclosed without the express consent of Minjar management:

- health matters;



- recruitment;
- training;
- conduct, performance and disciplinary matters;
- termination of employment;
- terms and conditions of employment;
- personal details and emergency contact details;
- trade/professional association membership e.g. union;
- leave arrangements; and
- taxation, banking and superannuation.

Minjar Gold takes all reasonable steps to protect the security of the private and personal information it holds. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

4.1.2 Confidential Information

Confidential information is information that Minjar Gold considers confidential and is not generally available in the public domain.

Proprietary information is information that Minjar Gold owns, develops, pays to have developed or to which it has an exclusive right.

Minjar Gold considers information about its business, operations, employees, clients, customers and suppliers to be confidential and proprietary. Where required, information will only be disseminated in a proper and effective manner that ensures so far as possible that the information is protected and used only for a proper purpose.

All Workers must ensure that they do not disclose any confidential or proprietary information to any third parties who do not have a valid business reason for receiving that information.

Workers must not disclose to any other person, or use for themselves any confidential or proprietary information they have originated or acquired in connection with their engagement with Minjar Gold without the express written permission of Minjar Gold.

Confidential and proprietary information includes:

- information regarding Minjar Gold's business planning or strategy;
- information regarding Minjar Gold's prospects or performance;
- financial information relating to Minjar Gold's business, or the business of its clients;
- documents or records or other information concerning Minjar Gold's sales or marketing plans, exploration, production or development activities;



- documents, records or other information concerning Minjar Gold's business strategies, business results, exploration and production results, unannounced products or services, and financial results and data;
- customer, client or vendor information;
- Minjar Gold's business processes, procedures and know-how;
- organisational information; and
- any other information that could be used by a competitor to place Minjar Gold at a competitive disadvantage.

If it is necessary to provide confidential or proprietary information to third parties or other employees for valid business purposes, adequate precautions should be undertaken to ensure that such information is only used for those purposes and is not disseminated or misused to the detriment of Minjar Gold and is returned or destroyed when the purpose is complete. Such precautions include the obtaining of a confidentiality agreement or other undertaking. Workers should obtain advice from the Chief Executive Officer in relation to such confidentiality agreements.

4.1.3 Access to personal information

Minjar Gold will provide employees access to the personal and private information held about them.

If employees require access to personal information, please contact the HR Representative and / or Group Manager Human Resources.

4.1.4 Complaints

If Employees have any complaints about Minjar Gold's privacy practices, a complaint may be made to the Group Manager Human Resources or Senior Leadership team.

Max Ji

Chief Executive Officer