



Policy on Sexual Harassment

Gateway Mining Limited (**Company**) and its related bodies corporate are committed to providing a safe environment for all its employees, contractors and visitors free from discrimination on any ground and from harassment at work including sexual harassment.

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment which may be physical, verbal and non-verbal. The Company recognises that sexual harassment may also occur between people of the same sex. All sexual harassment is prohibited whether it takes place within company premises or sites or outside, including at social events, business trips, training sessions or conferences sponsored by the Company. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
Physical violence, including sexual assault
The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

Comments on a worker's appearance, age, private life, etc.
Sexual comments, stories and jokes
Sexual advances
Repeated and unwanted social invitations for dates or physical intimacy
Insults based on the sex of the worker
Condescending or paternalistic remarks
Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

Display of sexually explicit or suggestive material
Sexually-suggestive gestures
Whistling
Leering

This policy applies to all staff, contractors, management and visitors of the Company. Management shall ensure that this Policy is clearly communicated to all personnel to ensure they are aware that the Company will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly and investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

To avoid any form sexual harassment, the Company personnel are required to:

- not engage in unwelcome behaviour or conduct of a sexual nature towards anyone in the workplace, regardless of gender identity or sexual orientation, and always behave appropriately.

Department	Corporate	Next Review Date	01/09/2025
Reviewed by	Admin	Document Status	Uncontrolled
Approved by	Board of Directors		

Document No:	GML-COR-013-POL
Version No:	1.1
Initial Issue Date:	07/12/2022
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- not harass anyone on the basis of sex.
- not engage in conduct that creates a hostile work environment.
- behave professionally and treating others with dignity, courtesy, and respect whether at work, working from home or out of work settings.
- take accountability for identifying, managing and reporting risks.
- report concerns about sexual harassment, sex-based harassment or conduct which creates a hostile work environment.
- protect and support, and not disadvantage or unfairly treat a person for making or being involved in a complaint.

Sexual harassment can occur:

- at any time, in any situation where you interact with colleagues, contractors, customers and visitors.
- at work location, working from home and work-related events (e.g. conferences, functions, Christmas parties and business trips).
- in different forms including physically, verbally, in writing or through electronic communications (phone, email, text/instant messaging, and social media).
- regardless of gender identity or sexual orientation, and can be by someone from the same or different gender identity or sexual orientation.
- when there is no intent to cause offence - the test is whether a reasonable person, considering the circumstances, would have anticipated the possibility that the person harassed would be humiliated, intimidated or offended.
- in a single act or as a series of acts and even outside of work and in relation to your relationships and interactions with colleagues.

Consequences of Policy breaches

Sexual harassment, sex-based harassment and creating a hostile work environment are unlawful conduct and prohibited under Federal, State and Territory laws. The individual may be personally liable if he/she engages in such conduct.

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