



**SheffieldResources**  
LIMITED

# **HUMAN RIGHTS POLICY**

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## **PREAMBLE**

The Board of Sheffield Resources Limited ("Sheffield" or "the Company") and each of its related bodies corporate embrace our commitment to upholding the fundamental human rights of our employees, the communities in which we operate and each of our other stakeholders who may be impacted by our business activities.

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## **HUMAN RIGHTS OBJECTIVES**

The Human Rights Policy shall enable Sheffield to:

- Develop and promote a workplace culture that upholds fundamental human rights in our activities and encourages responsible business practices
- Promote a diverse, inclusive and safe workplace for our people, free from discrimination and harassment
- Acknowledge and respect the rights, culture, connection to land and traditions of indigenous persons within the Kimberley and other regions of Australia where we operate
- Have respectful and transparent engagement with the Kimberley community in relation to the Thunderbird Mineral Sands Project
- Understand and recognise the fundamental rights set out in the United Nation's International Bill of Human Rights and in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- Conduct effective supplier and contractor due diligence to engage with commercial partners who share our commitment to human rights
- Not tolerate any form of forced labour or servitude including child labour
- Ensure compliance with relevant legislation, including the requirements of Australia's *Modern Slavery Act 2018*
- Promote open, accessible and transparent reporting mechanisms to report identified or suspected human rights concerns

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## **RESPONSIBILITIES**

This policy applies to all Sheffield employees and contractors who have a shared responsibility to ensure we uphold fundamental human rights. Sheffield employees are expected to understand this policy and the impact it has within their areas of responsibility.

The Board is responsible for implementing strategies to achieve the policy objectives via:

- Regularly reviewing and reporting upon objectives whilst continually seeking opportunities for improvement; and
- Complying with regulatory requirements pertaining to human rights.

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**AMENDMENT OF THIS POLICY**

This policy has been adopted by the Board. Any amendment to this policy can only be approved by the Board.

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**REVIEW OF THIS POLICY**

The Company Secretary will periodically conduct a review of this policy and the effectiveness of Sheffield's standards of conduct with respect to the objects of this policy to ensure compliance with the law and determine the extent to which the ASX Corporate Governance Council's Principles and Recommendations ("ASX Principles") have been met. The Company Secretary will report to the Board with his or her recommendations for consideration by the Board.

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**DISCLOSURE**

A copy of this policy should be made available on Sheffield's website and is to be made available to shareholders of Sheffield upon request.