

**Effective Date: 7 December 2021**

## **Our aim is to make positive contribution globally and where we operate.**

### **Our commitment**

Our contributions align with our values and commitments.

### **Our approach**

In making any contribution we seek to act honestly, fairly, ethically, and in accordance with applicable laws.

### **Our principles**

- We:
1. contribute via various methods including in-kind support, awards, volunteering, donations, sponsorships, programs, research and partnerships;
  2. adopt formal approval and documentation requirements for contributions and, where relevant, apply rigorous due diligence;
  3. follow transparent processes and procedures detailed in company policies including Anti-Bribery and Anti-Corruption Policy and our Code of Conduct;
  4. do not engage in political donations, sponsorships, or support, including contributions to political parties, politicians, elected officials or candidates for public office in any country;
  5. seek community input and broad community support prior to implementing contributions relevant to those communities;
  6. consider stakeholder relationships and seek to avoid conflicts of interest;
  7. seek to avoid contributions that could destabilise or undermine the activities of government;
  8. support employee participation through programs such as volunteering and matched giving initiatives for employee-led causes;
  9. seek to ensure that any contributions do not conflict with local practices and customs, our policies or the law;
  10. do not intentionally favour any potential recipient of our contributions belonging to one religious, ethnic, or political group on the basis of that membership;
  11. prepare community contribution plans that adopt an evidence-based approach that considers community aspirations, interests, and benefits;
  12. pursue focus areas for our contributions that consider our commitments and diverse operating contexts; and
  13. consider the sustainability of our community contributions and aim to ensure they are delivered in a manner that has minimal or no adverse environmental impact.

### **Responsibilities and accountabilities**

This is a policy of St Barbara Limited ("St Barbara") and its controlled entities (collectively, "St Barbara Group"). It applies to all directors, officers and employees of each member of the St Barbara Group and to any other person or organisation acting for or on behalf of the St Barbara Group ("Personnel").

This policy will be reviewed regularly by the Board at least biannually and updated as required. The General Counsel and Company Secretary is responsible for ensuring that this policy is implemented.

### **Policy governance**

Policy Approver: Board  
Policy Owner: General Counsel and Company Secretary  
Review Cycle: Biannual

### **Material policy revisions**

Version	Approval Date	Effective Date	Details
3.0	7/12/2021	7/12/2021	Periodic review