

## 1. INTRODUCTION

- 1.1 This privacy policy outlines how Northern Star Resources Limited and its related companies ("Northern Star") respects everyone's privacy and complies with the law.
- 1.2 The legal standards applicable to Northern Star are specified in the Australian Privacy Principles (APPs). The APPs are contained in the *Privacy Act 1988* (Cth) ("the Act"). The Act takes precedence over this privacy policy should any inconsistency arise from time to time.
- 1.3 Part A of this privacy policy does not apply to personal information collected, or otherwise obtained, by Northern Star, in relation to former or current employees and employment records held in relation to those individuals, except as required by the Act and the APPs.
- 1.4 Part B of this privacy policy sets out some of the specific ways Northern Star collects, uses, discloses and holds the personal information of former and/or current employees, in the interests of transparency.

## **PART A**

## 2. PERSONAL INFORMATION AND SENSITIVE INFORMATION

- 2.1 Personal information means information or an opinion about an identified individual or about an individual who is reasonably identifiable.
- 2.2 Some personal information is considered sensitive information (such as information regarding an individual's racial or ethnic origin, political opinions or membership in a political association, religious beliefs or affiliations, philosophical beliefs, membership in a professional or trade association, membership in a trade union, sexual orientation or practice, criminal record, health information, genetic information, or biometric information), and Northern Star may collect, store, use and disclose certain types of sensitive information including information relating to your health, race or ethnic origin, or criminal record.

## 3. COLLECTION OF PERSONAL INFORMATION

- 3.1 Northern Star will only collect personal information which is reasonably necessary for Northern Star to conduct its businesses. Northern Star collects personal information from contractors, sub-contractors, representatives of suppliers, clients, customers, landowners, job applicants and third party service providers (as examples).
- 3.2 Northern Star takes reasonable steps to ensure:
  - you are aware of why Northern Star is collecting your information ("the Purpose");
  - you are aware of how the information will be used, once it is collected ("the Reason"); and
  - if your information is to be collected by an entity other than Northern Star, that the collecting entity has accepted responsibility for providing you with the Purpose and the Reason of collection.
- 3.3 From time to time, Northern Star may be provided with personal information inadvertently. If this occurs, Northern Star will decide, within a reasonable period of time, whether it intends to store, use and disclose that personal information or otherwise destroy or deidentify the information.

## 4. USE OF PERSONAL INFORMATION

- 4.1 Northern Star may use personal information for the following purposes, among others:
  - in relation to applications for employment;
  - for general business-related purposes including, responding to enquiries, complaints or questions, administration of contracts, supporting charitable or social related activities, debt administration or for legal and regulatory requirements; and
  - if Northern Star has collected personal information from a third-party employer in the course of administering its business activities, its use will be for the purpose of administering the contract and business activities with the employer, broadly speaking.

## 5. DISCLOSURE OF PERSONAL INFORMATION

- 5.1 Personal information may be disclosed in the following circumstances, among others:
  - to related companies, which are currently based in Australia and the United States of America;
  - to third party service providers including, our lawyers, accountants, professional advisors, insurers, auditors, contractors, website and data hosting providers and technology service providers, which may or may not be based in the originating jurisdiction;

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- to third parties, only after consent has been obtained;
- in a state of emergency or an event, which triggers a continuity of business plan (with or without your consent);
- when required by law; and
- for the storage of data on servers located outside of the originating jurisdiction.

5.2 If personal information is disclosed to a third party service provider, Northern Star will take reasonable steps to ensure that the third party service provider complies with applicable law.

## 6. ACCESSING AND UPDATING INFORMATION

6.1 Northern Star will, when appropriate, provide access to personal information. Northern Star will correct any inaccurate, outdated, incomplete, irrelevant and/or misleading personal information held at the request of the relevant individual. Northern Star will also take all reasonable steps, in the circumstances, to ensure that the personal information collected, and used, is accurate, up to date and complete. Northern Star reserves the right to verify an individual's identity before providing any personal information.

6.2 Access will not be provided when:

- the consequences will have an unreasonable privacy impact on others;
- the request is frivolous;
- there are existing legal proceedings;
- providing access is unlawful or prejudicial to law enforcement; and
- Northern Star determines that access is not required by applicable law.

## 7. SECURITY

7.1 Northern Star will:

- take reasonable steps to protect personal information it holds from misuse, loss and from unauthorised access, modification or disclosure;
- when practicable, and if required by law, respect the anonymity of an individual if requested;
- only transfer personal information to foreign countries after taking reasonable steps, in the circumstances, to ensure that the overseas recipient does not breach applicable law, or which have at least equivalent privacy protection and when the individual has access to mechanisms to enforce that privacy protection;
- ensure all contractual arrangements with third parties adequately address privacy issues; and
- securely destroy personal information when it is no longer required by Northern Star or by law.

## 8. UNSUCCESSFUL JOB APPLICANTS

8.1 Information on unsuccessful job applicants will be retained for two years or as otherwise may be required by law and then will be securely destroyed when:

- a decision is made not to proceed with filling the job; or
- the new hire starts with Northern Star.

## 9. REQUESTING ACCESS AND RAISING CONCERNS

9.1 You can contact the Company Secretary at [compliance@nsrltd.com](mailto:compliance@nsrltd.com) regarding any access requests or concerns that you have about a breach of privacy.

9.2 In relation to an alleged breach of privacy, Northern Star will investigate the alleged breach of privacy and will advise you of the outcome of the investigation and any remedial action required to address any breach that is established.

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## **PART B**

### **10. EMPLOYEE RECORDS**

- 10.1 Northern Star will deal with an employee's personal information in accordance with applicable law to the extent that the collection, use, disclosure and holding of the personal information is regulated by law.
- 10.2 Northern Star appreciates that employees may want to know how Northern Star is dealing with their personal information. Accordingly, Northern Star advises that they may collect and hold an employee's information for purposes relating to an employee's employment including, for example, for the purpose of:
- managing and administering the employee's relationship and arrangements with Northern Star and maintaining any records in relation to this;
  - monitoring an employee's use of information technology and business systems made available to the employee during the course of their employment;
  - protecting the interests of Northern Star and its related companies; and
  - complying with applicable laws in Australia and the United States.

The above list is not exhaustive.

- 10.3 Northern Star will usually collect personal information from an employee, however in some circumstances, Northern Star may need to collect personal information about an employee from a third party or through the use of Northern Star's business systems, for the purposes described above.
- 10.4 Northern Star or its related companies may disclose personal information about an employee to:
- related companies in Australia and the United States; and/or
  - external service providers to which Northern Star or its related companies outsource functions for the purposes described above.
- 10.5 Some of the recipients to whom Northern Star may disclose an employee's personal information may be based overseas. It is likely that such countries will include, but may not be limited to, the United States of America and Australia.

### **11. OUT OF HOURS CONTACT DETAILS - EMPLOYEES**

- 11.1 Some employees of Northern Star may be identified as a "key person" and will be advised if they are required to be available out of hours in case of emergency. Their mobile phone number will be made available to select people at sites as well as local authorities, as a person to contact in case of emergency. If the employee does not wish to use their personal mobile phone number they can provide an alternate mobile phone number that is available out of hours in case of emergency.
- 11.2 If an employee considers that their privacy has been breached by any person who has access to their out of hours contact details, they are to advise the Company Secretary immediately so that steps can be taken to protect their privacy. An investigation will then be commenced without delay so that the appropriate disciplinary action can be taken against any offenders.

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