WORKPLACE POLICIES

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1. LEAVE POLICY

1.1 Overview

Your safety and well-being is a priority to Golden Cross. Leave entitlements are important to maintaining your physical and mental health.

1.2 Application

Full and part-time Golden Cross employees are eligible for all forms of leave under this Policy, subject to the requirements in the Policy being met and in accordance with the National Employment Standards (NES) set out in the Fair Work Act 2009 (the Act) and any applicable industrial instrument (ie an award or enterprise agreement).

Casual employees are eligible for unpaid carer's leave and unpaid compassionate leave, and in some circumstances unpaid parental leave, unpaid community service leave and long service leave under this Policy.

Contractors are not eligible for leave under this Policy.

1.3 Annual leave

1.3.1 How much annual leave are employees entitled to?

If you are a full time employee, you are entitled to four (4) weeks' paid leave for each completed year of service.

If you are a shift worker you are entitled to five (5) weeks' leave for each completed year of service.

If you are a part-time employee you will accrue annual leave on a pro-rata basis.

Annual leave accrues progressively based on continuous service. It is cumulative and therefore untaken annual leave will be paid out on termination of employment.

1.3.2 When should you take annual leave?

You should take annual leave at a time that is convenient to both you and Golden Cross. You must not take leave unless it is approved by your manager in advance, preferably at least four (4) weeks before your intended leave. Your annual leave will not be approved retrospectively.

You should take your annual leave within twelve (12) months of accrual.

If at any time you have accrued more than thirty (30) days' annual leave, Golden Cross may ask you to take up to two (2) weeks of that leave by giving you at least four (4) weeks' notice of the request to do so at a time reasonably convenient to Golden Cross and you.

You may take leave in advance if your manager gives approval.

1.3.3 What if you are sick during annual leave?

If you require personal/carer's leave during a period of annual leave, you may substitute personal/carer's leave for annual leave if a medical certificate supports your application.

1.4 Personal leave

1.4.1 How much personal leave are you entitled to?

If you are a full-time employee you are entitled to ten (10) days' paid personal leave for each completed year of service. Personal leave may be taken as either sick leave or carer's leave.

If you are a part-time employee you will accrue personal leave on a pro-rata basis.

Personal leave accrues progressively based on continuous service. It is cumulative, but untaken personal leave is not paid out on termination of employment.

1.4.2 When can you take personal leave?

You will be entitled to take personal leave:

- when you are unable to attend work on account of personal illness or injury (*i.e*., sick leave); or
- when you are required to provide care for a member of your immediate family or household (*i.e.,* carer's leave).

You must provide a doctor's certificate or proof of the need for personal leave if you take two (2) or more consecutive days of personal leave and Golden Cross requires it. If you fail to do so, the leave taken by you will be deducted as annual leave or will be unpaid.

1.4.3 When can you take unpaid carer's leave?

If you need to provide care or support to a member of your immediate family or household but you have used all of your personal leave, or if you are a casual employee, then you are entitled to take up to 2 days' unpaid carer's leave per occasion.

1.5 Compassionate leave

1.5.1 How much compassionate leave are you entitled to?

If you are a full time or part time employee, you are entitled to take up to 2 days' paid compassionate leave per occasion.

1.5.2 When can you take compassionate leave?

You may take compassionate leave:

- to spend time with a member of your immediate family or household who has a personal injury or illness that poses a serious threat to his or her life; or

- when a member of your immediate family or household dies.

1.6 Parental leave

1.6.1 Are you entitled to parental leave?

Parental leave entitlements are generally in accordance with the provisions of relevant legislation.

This includes an entitlement to 12 months' unpaid parental leave if you have completed 12 months' continuous service. You may request an extension of your unpaid parental leave for a further year and approval cannot be unreasonably refused. Casuals employed long term, who have a reasonable expectation of continuing employment by Golden Cross on a regular and systematic basis, are also entitled to 12 months unpaid parental leave.

Golden Cross also offers six (6) weeks of paid parental leave, if you are the primary care giver and qualify for unpaid parental leave under legislation.

Paid parental leave comprises three (3) weeks' pay upon commencing parental leave and three (3) weeks' pay when you return to work.

1.6.2 How do you apply for parental leave?

If you are applying for parental leave, you must:

- at least ten (10) weeks prior to the date leave commences, or as soon as practicable if 10 weeks' notice is not possible - provide written notice of the taking of parental leave, specifying the intended start and end dates of the leave required;
- at least four (4) weeks and preferably eight (8) weeks prior to your intended leave commencing - give Golden Cross written notice confirming the date that you propose commencing parental leave and your expected return date, or advising of any changes; and
- provide as part of the written notice:
    - for birth-related leave - a medical certificate stating the child's actual or expected date of birth; or
    - for adoption-related leave – a statutory declaration of the day or expected day of placement and that the child is under 16 years of age as at that date.

1.6.3 Concurrent parental leave

An employee may take concurrent parental leave of up to three (3) weeks, whilst their partner is also on parental leave. Concurrent parental leave may be taken at any time during an extended period ending no later than six weeks after the child's birth or placement.

1.7 Long service leave

Employees will be entitled to long service leave in accordance with the applicable State or Territory legislation in which they are engaged.

You must take long service leave at a time which is convenient to both you and Golden Cross.

1.8 Other leave

1.8.1 Are you entitled to unpaid leave?

You may be entitled to unpaid leave in exceptional circumstances. The following conditions apply to unpaid leave:

- unpaid leave may be granted at the Managing Director/CEO's discretion;
- unpaid leave is not automatic and will be considered only in exceptional circumstances;
- unpaid leave may only be taken after all accrued annual and long service leave has been taken;
- leave entitlements and remuneration entitlements will not accrue during any period of unpaid leave; and
- proof of your reason for taking unpaid leave may be required.

1.8.2 Are you entitled to study leave?

You may be granted paid or unpaid study leave at the Managing Director/CEO's discretion.

1.8.3 Are you entitled to community service leave?

You may be granted community service leave to be involved in jury duty and any voluntary emergency management activity in accordance with legislation and at the Managing Director/CEO's discretion. Casuals are also entitled to unpaid community service leave.

1.8.4 Are you entitled to field leave?

Field leave arises when full time employees on a salary are required to work days outside your normal hours of employment (ie weekends and public holidays) in the field (ie outside the office) during exploration programs. You may be granted field leave at the Managing Director/CEO's discretion. Casuals are also entitled to field leave if they are not paid for the additional time worked. Field leave only applies to additional days worked (not hours) and does not apply to office-based work programs.

2. HEALTH SAFETY, ENVIRONMENT AND COMMUNITY (HSEC) POLICY

2.1 Policy

2.1.1 Overview

Golden Cross aspires to Zero Harm to its employees, the community and the environment through promoting and maintaining a safe and healthy working environment and striving to achieve leading industry practice. Health, Safety, Environment and Community (HSEC) performance of all employees will be assessed and considered in all appointment, promotion and disciplinary decisions. This Policy has been developed to ensure, as a minimum, compliance with relevant legislation and will be reviewed at least annually to continually improve Golden Cross' performance. Golden Cross management will ensure resources are made available to implement the Policy.

All directors, employees and contractors of Golden Cross are required to comply with this Policy and all applicable Federal and State Laws while working for or representing the Company.

2.1.2 What are the objectives of this Policy?

The objectives of this Policy are to:

- Demonstrate the commitment of the Board of Directors and senior management to striving for Zero Harm in all Golden Cross activities;
- Prevent workplace accidents, disease and disruption to communities in which we operate;
- Minimise damage to the environment in our activities;
- Ensure appropriate management systems are implemented and maintained at all sites;
- Encourage a culture of positive responsibility in all employees, contractors and visitors to Golden Cross sites or premises towards their own safety, the safety of others, protection of environmental values and continual improvement through open reporting and thorough investigation of root causes of incidents and accidents to prevent recurrences; and
- Establish and maintain suitable programs to meet the Policy objectives.

2.1.3 How does Golden Cross achieve the objectives of the Policy?

- Implement and maintain work practices which are safe and reduce the risk to health of our employees, the environment and the community;
- Provide training, re-training, information, instruction and supervision for all employees to enable them to perform their work safely and in accordance with all safety and environmental statutory requirements, responsibilities and obligations;

- Ensure contractors adopt and implement HSEC standards at least equal to those of Golden Cross Resources at our sites;
- Identify, assess and manage risks and hazards to employees, contractors, the environment and our host communities;
- Set and achieve safety and environmental performance targets with continual assessment and improvement of performance year on year;
- Apply a transparent and constructive approach in our daily interactions with stakeholders;
- Minimise the use of consumptive resources and promote the re-use, reduction and recycling of waste products where possible;
- Ensure business activities uphold ethical standards and fundamental human rights including respect for indigenous culture and heritage;
- Encourage diversity in our workforce and provide an environment of mutual trust and respect where employees can realise their potential; and
- Ensure all employees are aligned with our Zero Harm aspirations and take their HSEC performance into account when considering promotion or counselling.

Golden Cross will strive for excellence in safety and environmental management and firmly believes a safe and healthy work environment that has a minimal and manageable impact on the natural environment will deliver value to employees, shareholders and the community.

All employees in their monthly reporting are required to comment upon and assess their individual and their overall work unit's HSEC performance.

2.2 Application

2.2.1 Who does this Policy apply to?

This Policy applies to the following persons who shall be referred to as Personnel for the purposes of this Policy.

(a) Directors

Directors must lead by example in complying with this policy and ensure management implements this policy.

(b) Managers

Managers must lead by example and ensure that this Policy is effectively communicated by written and verbal instruction, implemented and complied with in their areas, including by training and re-training of employees in health, safety, environmental and community responsibilities.

(c) Employees

Employees must comply with this Policy to ensure their own health and safety and the health and safety of others in the workplace, as well as exercising prudence with critical environmental resources in order to reduce adverse environmental impacts.

Employees must comply with all directions made by Golden Cross relating to health, safety and environmental protection, including those relating to methods of work, use of equipment and restricted areas.

(d) Contractors

Contractors engaged by Golden Cross working on Golden Cross' tenements, premises or elsewhere must comply with this Policy and any of Golden Cross' other health, safety, environment and community policies, procedures and programs.

(d) Other Persons on Golden Cross' premises

All other persons, including short-term site visitors and joint venture partners, on Golden Cross' tenements, premises or other land controlled or managed by Golden Cross must comply with this Policy and any of Golden Cross' other health, safety, environment and community policies, procedures and programs.

2.2.2 What about when I am on-site?

When present on one of Golden Cross or Golden Cross' clients', project sites or camps, the site or camp rules with respect to health and safety will apply to you in precedence to this policy where the two policies are inconsistent.

2.3 Occupational Health and Safety Requirements

2.3.1 Reporting

All personnel must report any unsafe act or behavior to their supervisor or the site manager. This is a crucial element to the GCR safety systems as it provides a key mechanism for all employees to remain safe and healthy while at work. It should be seen as a "buddy" system where all employees are aware of and look out for the well-being of their fellow employees and other persons on GCR sites.

2.3.2 Who must complete the General Lease induction?

All Personnel must successfully complete the general lease induction (including components of safety and environment) before commencing work for Golden Cross. Before commencing field activities at a site all employees and contractors must successfully complete a site induction. The completed signed off induction assessment must be emailed to the administrative office as soon as possible for documenting.

2.3.3 What personal protective equipment must be used?

All Personnel must use safety equipment (including personal protective equipment - PPE) as required by Golden Cross. Individuals working on active exploration and/or mining project sites shall ensure they are issued with and wear the following mandatory clothing:

- Collared, short or long-sleeved shirt;
- Long pants / trousers; and
- Steel toecap lace-up boots (no elastic sided boots).

Job-specific risks will dictate what specialist PPE is required. Individuals issued with PPE are to ensure it is in good working order, and fitted and worn correctly before commencing and while undertaking work on site. Additional PPE provided by Golden Cross, as required, includes:

- safety glasses (clear or tinted), goggles and face shields;
- hard hat/ safety helmet;
- ear plugs / ear muffs;
- gloves (rubber/ leather);
- high visibility clothing
- respiratory protection / masks; and
- sun-screen, wide brimmed hats and hard hat brims.

2.3.4 How do you ensure you are fit for work?

Golden Cross is committed to ensuring the safety and health of all individuals associated with its operations through various processes of education, awareness, assistance, counselling and, if required, disciplinary procedures. An obligation of all individuals in complying with this commitment is to ensure you are fit for work whilst performing your duties.

An individual's fitness for work may be affected by a variety of reasons including the adverse effects of:

- fatigue;
- emotional distress (such as depression and anxiety);
- injury/illness;
- physical incapacity; and
- alcohol or drugs (over the counter, prescription, illicit or synthetic agent compounds).

These factors can lead to material deficiencies in an individual's work performance and can be a contributing factor in workplace accidents.

Fatigue, Stress and other Non-Drug and Alcohol-Related Issues

The following directives are to be followed to ensure you remain fit for work and do not allow fatigue, stress and other Non-Drug and alcohol-related issues to affect your work performance:

- Fatigue, associated with or caused by physical exertion, mental exertion, or inadequate or disturbed sleep, the use of prescription or non-prescription medications and medical conditions must be avoided wherever possible.
- Individuals should not work more than 14 hours continuously unless assessed and authorised by your manager;
- Unless extenuating circumstances exist, you should have a break of at least 10 hours between rostered shifts;
- You should not work more than 14 consecutive shifts without a 24-hour break unless assessed and authorised by your manager.
- Individuals who feel fatigued, stressed (as manifested in high levels of anxiety, tension, depression, anger etc.) ill or are suffering from physical incapacity which is affecting their ability to do their job must inform their supervisor and not remain at work if they present a hazard to themselves or others.
- If you have reason to believe a colleague or peer is suffering from fatigue or stress, you should inform that person in an objective manner;
- Individuals may be requested to seek medical and/or psychological assessment where a manager, supervisor or other person in the workplace has reasonable grounds to believe that their fitness for work may be affected by physical or mental illness, injury, stress, fatigue or any other Non-Drug and alcohol related condition. This assessment may also require referral to other professionals for specialist assessment.
- Where an individual has been assessed for a physical or mental illness, injury, stress, fatigue or any other Non-Drug and alcohol related condition, that individual will not be permitted to return to work until they have been appropriately cleared for a return to work under procedures acceptable to Golden Cross management and/or a Golden Cross-approved medical physician.

Where you advise your manager prior to commencing a shift that you are not fit for work because of fatigue, stress and other Non-Drug and alcohol-related issues and will not be attending work, you shall take paid sick leave, rostered leave or annual leave (if accrued) or otherwise authorised unpaid leave depending on your entitlements.

Illicit, Prescription and Over-the-Counter Drugs

The use of illicit drugs and the use and/or misuse of prescription and over the counter drugs may have side effects that can adversely affect a person's fitness for work. To minimise any safety risk to that person and other employees, all individuals must:

- Not be at work while adversely affected by any drugs;
- Inform a supervisor if the employee is in any doubt that he/she may not be fit to work due to the use of any drugs;
- Inform a supervisor if another employee is suspected of being drug-affected;
- Agree to participate in any drug screening process that Golden Cross management conduct from time to time;

- Follow the direction of a supervisor to leave work if in that person's opinion the employee is adversely affected;
- If using prescription drugs, obtain advice from their medical practitioner as to any side effects, which could impair their ability to work safely; and must advise their manager/supervisor before commencing work. Where necessary, the person's job tasks or working arrangements may be adjusted; and
- If needing to consume a non-prescription or over-the-counter medication, ask their medical practitioner or pharmacist for a medication which will not impair the ability to work safely. If it is necessary for the employee to take a medication, which could impair their ability to work safely, they must do so strictly in accordance with the manufacturer's recommended dosage and must advise their manager/supervisor before commencing work. Where necessary, the employee's job tasks or working arrangements may be adjusted.

If an employee is unable to work due to adverse effects of a drug, he/she will be required to use leave entitlements to cover that period.

Personnel will not be in breach of this Policy for appropriate use of prescription and over the counter drugs.

Alcohol-Related Issues

Golden Cross requires a zero blood alcohol content (BAC) at all times, either on field or office duties.

Alcohol is the most commonly used drug in Australia and is a depressant drug that slows the brain activity responses and impairs coordination. The recent consumption of alcohol may impair a person's ability to safely conduct their duties and therefore make them unfit for work. To minimise any safety risk to that person and other employees, all individuals must:

- Not be at work while adversely affected by alcohol;
- Inform a supervisor prior to commencing work if there is in any doubt that he/she may not be fit to work due to the recent consumption of alcohol;
- Inform a supervisor if another employee is suspected of being alcohol-affected;
- Agree to participate in any breath alcohol concentration (BAC) testing process that Golden Cross management conduct from time to time; and
- Follow the direction of a supervisor to leave work if in that person's opinion the employee is adversely affected.

"Hangovers" resulting from recent excessive consumption of alcohol may also decrease work performance and increase risk of safety hazards. That is, a person may be impaired and unfit for work, even with a zero BAC.

2.3.5 What processes does Golden Cross use to assess fitness for work?

Processes that Golden Cross uses to assess fitness for work include:

- Pre-employment medical examinations;
- Random drug and alcohol testing;
- Informed opinions of Golden Cross management and supervisors based on observation of work practices and other behaviour, and following due consultation with the employee; and
- Independent opinions of appropriate medical practitioners (in extreme cases).

Golden Cross may request a prospective employee to submit themselves for medical fitness examination prior to and as a condition of employment being offered which confirms that an individual is physically able to properly carry out the required duties.

Once employed or engaged, a suitably qualified and trained Golden Cross representative will conduct drug and alcohol testing and screening on random personnel at random frequencies. Incident-specific testing and screening will also be undertaken.

BAC will be tested using portable, hand-held, Australian Standards compliant BAC testing equipment in accordance with the manufacturer's instructions. Personnel may also be screened for positive drug exposure. Screening is conducted to detect the presence of the following substances in urine:

- Amphetamines (AMP);
- Methamphetamines (MAMP);
- Cocaine (COC);
- Marijuana (THC);
- Benzodiazepines (BZO);
- Morphine (MOP);

Golden Cross will be responsible for payment of the initial screening and confirmatory tests. All Personnel consent to Golden Cross receiving all relevant information about them regarding any BAC or drug test performed in accordance with this Policy.

2.3.6 What criteria are used to assess fitness for work?

"Fitness for work" means that an individual is in a state (physically, mentally and behaviourally), which enables them to perform assigned tasks competently and in a manner which does not compromise or threaten the safety or health of themselves or others. The following criteria will be applied by Golden Cross to assist Golden Cross managers, employees and contractors to ensure they and their co-workers are fit for work at all times:

- For fatigue, stress and other Non-Drug and alcohol-related issues

  Initial determination of fitness for work is based on the opinion of Golden Cross management following due consultation with the employee. Final determination of fitness for work for fatigue, stress and other Non-Drug and alcohol-related issues, if required, is made by an appropriate medical practitioner. This determination will be made in consultation with Golden Cross management and, where appropriate, in

conjunction with other assessment procedures, and following due consultation with the employee, contractor or other person to whom this Policy applies. If you are deemed unfit for work, actions relevant in section 2.3.6 of this Policy will apply.

- For alcohol-related issues

  An individual who records a BAC of more than 0.000% will be deemed unfit for work for that shift. Once appropriate breach proceedings have been enacted, the individual must return a BAC test result of 0.000% prior to recommencing work at the next shift.

- For drug-related issues

  For the purpose of this Policy, results of an individual's initial drug screen equal to or greater than the cut-off levels listed below shall be subject to confirmatory testing for any illegal or prescribed substance (unless the level is a result of appropriate use of prescription or over the counter medications and is deemed safe by a relevant health professional such as a physician; supported by authentic written confirmation from the physician):

Substance	Cut-off level (ng/mL)
Amphetamines	300
Methamphetamines	300
Cocaine	300
Marijuana	50
Benzodiazepines	200
Morphine	300

For the purpose of this Policy, the cut-off level for synthetic agent compounds is nil. That is, any test that detects the presence of synthetic agent compounds will be considered a positive test.

Confirmatory testing refers to an analytical procedure, undertaken at a testing laboratory accredited against AS/NZS 4308:2008, which uses mass spectrometry to unequivocally identify the presence of a specific drug and/or metabolite. Where urine samples return a confirmatory test result equal to or greater than the criteria levels listed below, the respective individual will be deemed unfit for work until such time as appropriate breach proceeding have been enacted and the individual returns a negative initial screen result.

Compound	Confirmatory Test (µg/L)
Benzoylecgonine Ecgonine methyl ester	150 150
Amphetamine Methylamphetamine Methylenedioxymethylamphetamine Methylenedioxyamphetamine Benzylpiperazine Phentermine Ephedrine Pseudoephedrine	150 150 150 150 500 500 500 500
Codeine Morphine 6-Acetylmorphine	300 300 10
11-nor-∆9-Tetrahydrocannabinol-9-carboxylic acid	15
Diazepam Nordiazepam Oxazepam Temazepam α-hydroxy-alprazolam 7-amino-clonazepam 7-amino-flunitrazepam 7-amino-nitrazepam Non-prescription synthetic agent compounds	200 200 200 200 100 100 100 100 Nil

Approved laboratory testing may also test for synthetic drug compounds regardless of the initial screening result, even where synthetic drug compounds were not identified on the original drug test.

- Refusal of a drug and/or alcohol test will be recorded as a positive result and the individual will be deemed unfit for work, and will face disciplinary procedures, which may result in termination of the individual's employment or engagement.

- Any attempt to avoid or falsify any alcohol and/or drug test will involve disciplinary procedures, which may result in termination of the individual's employment or engagement.

2.3.7 What happens if you are unfit for work?

If a test shows that you are unfit for work, you will be subject to the following procedure:

- You will be removed from the work site for the remainder of the shift;
- Where necessary, a supervisor or manager will make arrangements for you to be transported back to your accommodation (or to appropriate medical facilities);
- You will not be permitted to return to work until you demonstrate that you are fit for work;
- If you were deemed unfit for work as a result of the effects of alcohol or drugs, you must return a BAC result of 0.000% and/or a negative screen result for drugs (you will be required to meet the payment for any drug testing) and be cleared fit for work by the most senior Manager at the work site prior to you returning to work; and
- If you were deemed unfit for work as a result of fatigue, stress or other Non-Drug and alcohol-related issue, you can only return to work if, in the opinion of Golden Cross management and/or appropriate medical practitioner (for extreme cases), you can demonstrate appropriate mitigation of the causative agent and that you are fit for work.

2.3.8 What are the fitness for work disciplinary actions?

In the event of a first positive result for alcohol or drugs, the following action will be taken:

- Prior to recommencing work, you will be counselled by your manager or supervisor regarding:
  - this Policy and your obligations and responsibilities under it;
  - the reasons why you were deemed unfit for work;
  - the serious and unacceptable nature of your behaviour;
  - the risk posed to your safety and the safety of others;
  - your responsibility to demonstrate that the problem has been effectively addressed; and
  - the consequences for future breaches of this Policy;
- You will be advised that you may be monitored for a period of time to ensure that the threat to work performance and/or safety has been addressed;
- You will be offered assistance to address any health issues;
- You will receive a first written warning which will reflect the key points covered in this process. A copy of the first written warning will be placed on your personnel file; and
- You will not be paid for the period that you are unfit for work.

In the event of a second positive result for alcohol or drugs, the following action will be taken:

- You will be counselled by your manager or supervisor as set out above;

- You will be formally offered the opportunity to contact a professional counsellor;
- You will be advised that you will be monitored and may be subject to periodic alcohol and drug screening;
- You will be required to demonstrate that the threat to work performance and/or safety has been effectively addressed and you are fit for work before you are permitted to return to work;
- You will receive a final written warning to the effect that the second positive test is treated very seriously and any recurrence will result in termination of employment or engagement. A copy of that final written warning will be placed on your personnel file; and
- You will not be paid for the period that you are unfit for work though you may access your paid leave entitlements.

In the event of a third positive result for alcohol or drugs, the following action will be taken:

- You will be suspended from duty pending investigation into the circumstances of the result;
- As soon as practicable, you will be interviewed by your manager or supervisor and be given the opportunity to explain your behaviour; and
- Unless Golden Cross considers that there has been a sufficient explanation for your conduct, your employment or engagement will be terminated.

When a misuse period of not less than 12 months has been achieved following a first breach for alcohol and/or drugs, the individual will be regarded as successfully rehabilitated and any future incidents or concerns will be treated as a first breach.

The actions set out in this sub-clause will not necessarily apply in exceptional circumstances or where Golden Cross is required to take steps to maintain compliance with its obligations under workplace health and safety legislation. Serious breaches of this policy which could lead to unacceptable risks for the person(s) involved or other employees may lead to one or more steps in the disciplinary process being skipped.

2.3.9 Will I be paid if breach of fitness for work?

Whether, and how, payment is received for time off work as a result of a breach of this fitness for work Policy will be determined in accordance with the following guidelines:

- Payment will not be paid for time off due to a drug or alcohol breach;
- Payment for other fitness for work issues will be as per the existing leave provisions; and
- If an employee or contractor is stood down from duties awaiting the results of a confirmatory drug test and the results come back negative, that employee will be paid normal provisions.

2.3.10 Special Conditions

In the event that personnel are called out to site outside of working hours, whether rostered on-call or emergency call-outs, Personnel must not attend the workplace for the purposes of work if unfit for work.

Whilst Personnel are in control of a Golden Cross vehicle, they must remain with a BAC of 0.000%. It is not permitted for employees to drink alcohol while travelling in Golden Cross-provided transport and Personnel are reminded that drinking alcohol when in control of a vehicle is illegal.

In any case involving a positive drug test or in which a Personnel member is absent due to the consumption of drugs, Golden Cross reserves the right to search and inspect the Personnel member's on-site accommodation.

2.3.11 What else should I be aware of?

The unauthorised sale or supply of alcohol, prescription, illicit or over the counter drugs by any individual in the work place may result in the termination of the individual's employment.

The unauthorised consumption or possession of any alcohol or the consumption or possession of any illicit drugs or implement designed for the purpose of drug consumption while on the work site may result in termination of employment.

In addition to issues of safety and internal disciplinary actions that may be taken, appropriate authorities, such as the police, may be notified if illegal activities have occurred.

2.4 Environmental Requirements

2.4.1 What if you wish to bring Hazardous Substances to site?

Employees must comply with the Regulations and approved Code of Practice for dealing with hazardous substances in force in the State or Territory in which they are engaged. For example:

- In Western Australia, the *Occupational Safety and Health Regulations 1996* (WA) and "Control of Workplace Hazardous Substances" Code of Practice (NOHSC: 2007(1994)); and
- In New South Wales, the *Work Health and Safety Regulations 2011* (NSW) and "Managing Risks of Hazardous Chemicals in the Workplace" Code of Practice.

Hazardous substances have chemical and physical characteristics, or are of substantial quantity or concentration, that transport, storage and handling of the substances is a threat to the environment or human health.

All employees and contractors must notify Golden Cross of their intention to bring hazardous substances on a tenement prior to their use or delivery to that particular site. No hazardous substances are permitted on a tenement unless and until approval by Golden Cross' senior

manager at the site has been received in writing. This will require the presentation of suitable Material Safety Data Sheets and other necessary documentation.

2.4.2 What are my other Environmental Management Obligations?

All Personnel will make themselves and any sub-contractors fully aware of the requirements of any applicable environmental permits, approvals and licenses and shall ensure that at all times their activities and facilities on site are compliant.

All Personnel agree to provide data to enable Golden Cross to fulfil its environmental reporting requirements (*e.g*., National Pollutant Inventory, Energy Efficiency Opportunities, Global Reporting Initiative, Annual Environmental Report, Annual DEC report, *etc*.).

Personnel shall not cause or permit damage or injury to any vegetation or fauna except that which is essential for performance of work duties and then only if and to the extent expressly set out in this Policy and has all necessary statutory approvals in place prior to the activity commencing.

Whilst on Golden Cross' tenements, Personnel are not permitted to:

- possess firearms, traps or other items constituting offensive weapons;
- hold or bring onto the tenements dogs, cats, or any other animals; and
- take/remove any flora, fauna or fire wood.

2.5 Community Requirements

2.5.1 Overview

Golden Cross aims to achieve broad based support for its activities during all project phases (exploration, development, operation and eventual closure) by working co-operatively with key stakeholders, including traditional owners, land owners, pastoralists, regulators and the wider community to achieve sustainable community benefits.

Golden Cross recognises and respects indigenous people's affiliation to the land and their traditional values and ways.

2.5.2 What are my obligations to meet these requirements?

All Personnel must acknowledge that mining is often a shared land use with other stakeholders such as businesses (*e.g*., agricultural producers, landowners, farmers, graziers, pastoral lease holders), individuals (*e.g*., traditional owners and Native Title claimants), government bodies and non-government interest groups. When conducting mining-related activities on Golden Cross tenements, due care must be practised to ensure our individual community obligations are met. These include, but are not limited to:

- Ensuring access approvals are in place and all conditions are met;
- Closing gates and not damaging stock fences;

- Not interfering with stock, dams or other watering points;
- Being aware of and obtaining all necessary permissions for ground disturbing activities such as permission from landowners and obtaining heritage site clearance prior to conducting mining-related activities;
- Avoiding any potential heritage sites not previously identified;
- Reporting all community relations incidents or public complaints to Golden Cross management;
- Actively participating in indigenous culture awareness training opportunities and building healthy relationships with members of key native title claimant groups who speak for the country on which Golden Cross conducts its activities; and
- Recording and reporting any community complaints or issues on the Incident Report Form (obtained from a Golden Cross Supervisor), submitting this form to the Supervisor or the senior Site Manager, and taking appropriate action to investigate, validate and mitigate the concerns.

2.5.3 What is unacceptable?

Golden Cross will not tolerate:

- Racial, religious, ageist, sexist or ethnic discrimination at any time;
- Willful damage to property or sites of indigenous and non-indigenous cultural heritage; and
- Any other behaviour or activities which are contrary to Golden Cross policies.

3. WORKPLACE BEHAVIOUR POLICY

3.1 Overview

Golden Cross is committed to ensuring that our workplace is one where all employees, potential employees, contractors and other external parties are free from discrimination, sexual harassment, bullying and victimisation (together known as unacceptable behaviour).

All directors, employees and contractors of Golden Cross are required to comply with this Policy and all applicable Federal and State Laws while working for or representing the Company

We encourage you to raise any questions about this Policy with your manager, and any concerns about unacceptable behaviour in accordance with the Complaint Procedure outlined in this Workplace Behaviour Policy.

3.2 Application

3.2.1 Who does this Policy apply to?

This Policy applies to all Personnel, including directors, managers, employees, potential employees, contractors and other persons on Golden Cross' premises, regardless of whether they work full-time, part-time or as casuals.

3.2.2 When does this Policy apply?

This Policy applies to all Personnel during the course of their work:

- in the workplace, including work outside normal working hours;
- during work activities; and
- at work-related events, including social functions
- outside work-related activities if it impacts on the workplace (eg inappropriate use of social media impacting other employees).

3.3 Responsibilities

3.3.1 Who is responsible for workplace behaviour?

Everyone who works at Golden Cross is responsible for ensuring that they:

- are familiar with this Policy; and
- comply with this Policy; and
- report potential breaches of this policy.

3.4 Discrimination

3.4.1 How does discrimination happen?

Discrimination can happen either directly or indirectly.

- Direct discrimination occurs when a person is disadvantaged or treated less favourably than another person in the same or similar circumstances, because of any of the grounds or attributes listed below.
- Indirect discrimination occurs when there is an unreasonable rule, requirement or practice which appears neutral, but with which a high proportion of people with an attribute or ground listed below cannot comply.

For example, the minimum height requirement that used to exist in the police force directly discriminated against short people on the basis of physical appearance, and indirectly discriminated against women and people of certain races, who tend to be shorter.

3.4.2 What grounds of discrimination are unacceptable?

At Golden Cross, discrimination based on any of the following grounds or attributes is unacceptable:

- sex;
- marital status;
- pregnancy and potential pregnancy;
- race;
- religion;
- political beliefs;
- disability, illness or injury;
- industrial activity and trade union membership;
- sexual preference and lawful sexual activity;
- transvestite history and status;
- carer status or family responsibilities;
- physical features;
- breastfeeding;
- age; and
- personal association (whether as a relative or otherwise) with a person who is identified by reference to any of the above attributes.

3.4.3 Examples of discriminatory behaviour

Discrimination may involve:

- offensive ‘jokes’ or comments about another person’s racial or ethnic background, sex, sexual preference, age, disability, and the like;

- display of pictures, calendars, pin-ups, posters, computer images (e.g. in electronic mail messages) etc. which are offensive or derogatory;
- expressing negative stereotypes of particular groups, for example, 'married women shouldn't be working';
- judging a person on characteristics such as religious or political beliefs, cultural practices, sex or age rather than work performance; or
- using stereotypes or assumptions when making decisions about a person's career.

3.4.4 Exceptions

In some situations the legislation may provide exceptions to discrimination, or permit what would otherwise be unlawful discrimination. In these circumstances discrimination will be permissible. For example, while it is unacceptable to discriminate against a person with a disability, what would otherwise be unlawful discrimination may be justified if the person cannot perform the inherent requirements of a position/role after reasonable efforts have been made to accommodate the disability in the position/role.

3.4.5 Sexual harassment

What is sexual harassment?

A person sexually harasses another person if they:

- make an 'unwelcome sexual advance';
- attempt to 'groom' a target with initially innocuous work-related comment which progressively 'pushes the limit' of acceptable commentary towards unduly private comment;
- make an 'unwelcome request for sexual favours'; or
- engage in other 'unwelcome conduct of a sexual nature';

and a reasonable person, having regard to all the circumstances, would have anticipated that the other person would be offended, humiliated or intimidated.

'Conduct of a sexual nature' includes:

- subjecting a person to any act of physical intimacy;
- making, orally or in writing, any remark or statement with sexual connotations to a person or about a person; and
- making any gesture, action or comment of a sexual nature.

Motive or intention is irrelevant

Sexual harassment is unwelcome, uninvited behaviour which is offensive from the viewpoint of the person being harassed. It does not matter that the offender did not mean or intend to sexually harass the other person. In other words, an offender's 'innocent intent' is irrelevant.

Examples of sexual harassment

Sexual harassment can involve any physical, visual, verbal or non-verbal conduct of a sexual nature including either one-off incidents or a series of incidents. It also includes workplace behaviour or behaviour in connection with work, for example, at a formally approved office party or work function outside of work hours.

Depending on the circumstances, some other examples of sexual harassment are:

- displays of sexually graphic material including posters, pictures, calendars, cartoons, graffiti or messages left on boards or desks;
- electronic mail messages, voice mail messages, screen savers, any material of a sexual nature downloaded from the internet, or viewed on a computer, offensive telephone calls, faxes, or gifts;
- deliberate and unnecessary physical contact, such as patting, pinching, fondling or deliberately brushing against another body, attempts at kissing;
- leering or staring at a person's body;
- inappropriate 'humour' such as smutty or sexist jokes or comments;
- innuendo, including sexually provocative remarks, suggestive or derogatory comments about a person's physical appearance, inferences of sexual morality or tales of sexual performance;
- repeatedly asking someone out, especially after prior refusal; and
- intrusive inquiries into a person's private life or in reference to a person's sexuality.

Behaviour can breach this Policy even if it is not unlawful

Golden Cross may decide that behaviour breaches this Policy even if a complaint has not been raised. For example, storing and viewing sexually explicit images on a computer at work may constitute sexual harassment under this Policy even if a complaint has not been made against the offender. This behaviour is still unacceptable at work, even if it is not unlawful, and may result in disciplinary action being taken, including termination of employment or engagement.

3.5 Bullying

3.5.1 What is bullying?

Workplace bullying is unreasonable behaviour directed towards an employee, customer, contractor or other external party that creates a risk to their health, well-being or safety. Unreasonable behaviour is that which victimises, humiliates, undermines or threatens the person being bullied, or would reasonably be expected to do so. Bullying breaches this Policy and also occupational health and safety legislation which provides that all workers must take reasonable care for the health and safety of their co-workers.

3.5.2 Examples of bullying

Bullying can include behaviour such as:

- verbal or written abuse (e.g. being sworn at, threats, insults, continual criticism, name calling, practical jokes, unjustified threats of dismissal);
- direct violence including physical assault and harassment;
- threatening body language;
- unreasonably undermining work performance, deliberately withholding work-related information or resources, or deliberately supplying incorrect information;
- constant, intrusive surveillance or monitoring; and
- inappropriate interference with personal belongings or work equipment.

3.5.3 What bullying does not include

Bullying does not include:

- genuine and reasonable disciplinary procedures;
- constructive feedback or counselling that is intended to assist employees to improve their work performance or the standard of their behaviour. For example, objective comments which indicate observable performance deficiencies; or
- directing and controlling how work is done and what work is done (a fundamental right of all employers).

3.6 Victimisation

3.6.1 What is victimisation?

Victimisation means subjecting or threatening to subject a person to a 'detriment' (see definition below), because they propose to, have, or are believed to have, under this Policy, equal opportunity legislation or occupational health and safety legislation:

- asserted their rights under this Policy, or the relevant legislation;
- alleged that another person has breached this Policy or the relevant legislation; or
- assisted someone in raising an issue.

3.6.2 What is a detriment?

A 'detriment' in employment includes demotion, dismissal, transfer, suspension, loss of a benefit, being ostracised from work or work related social functions, or being the subject of gossip or innuendo.

3.6.3 Golden Cross' approach

Golden Cross does not permit retaliation against a person just because they propose to, have, or are believed to have made a complaint of unacceptable behaviour under this Policy, equal opportunity legislation or occupational health and safety legislation.

3.6.4 If someone raises a complaint with you about your behaviour

If a person raises a complaint directly with you about your behaviour, you should appreciate that they are letting you know that they find your behaviour unacceptable. They are giving you an opportunity to change your behaviour, and possibly prevent a formal complaint from being made against you. If someone does raise a complaint with you about your behaviour, you should consider monitoring and changing your behaviour, and you should not victimise the person making the complaint.

You may wish to commence a mediation process with the offending party (section 3.7).

3.7 Complaint procedure

3.7.1 Key features of the complaint procedure

Golden Cross' complaint procedure is:

(a) Confidential

Only the people involved in the attempted resolution or the investigation of an issue or complaint will have access to information about it. This means that only those people with a genuine role to play in helping to resolve an issue or complaint should know its details or discuss them. Anyone found to have engaged in gossip or innuendo about an issue or complaint is at risk of disciplinary action from Golden Cross and possibly legal action under the laws of defamation.

Golden Cross considers confidentiality one of the most important aspects of dealing with issues and complaints about unacceptable behaviour. However, in some circumstances information may not be able to be kept confidential, such as where physical threats are involved or the law otherwise requires disclosure.

(b) Respectful

Everyone involved in an issue or complaint raised under this Policy will be treated with dignity and respect throughout the complaint process. Similarly, everyone involved in an issue or complaint is required to treat each other with dignity and respect even if they feel aggrieved by a situation.

(c) Fair and impartial

All parties will have the opportunity to tell their side of the story. No assumptions will be made and, to the extent possible, no action will be taken until all (or at least sufficient to make a reasoned decision) relevant information has been collected and considered.

(d) Supportive

No action will be taken against anyone for making or helping someone to raise an issue or a genuine complaint. Golden Cross will take all reasonable steps to support anyone raising an issue or making a complaint, and to ensure that they are not victimised.

(e) Prompt

All issues and complaints will be dealt with as quickly as possible.

3.7.2 Step 1

A person believing that they are experiencing unacceptable behaviour in the workplace is encouraged by Golden Cross to raise it directly with the person involved. This should help to ensure that the other person is fully aware that their behaviour is unwelcome, and that the complainant believed it is unacceptable. This approach is recommended as it often resolves the issue quickly and effectively.

If the issue is not resolved, or you are not comfortable with raising it directly with the other person, you should raise it with any management person deemed appropriate.

3.7.3 Step 2

Golden Cross' management should be contacted in the event of you wishing to raise a formal issue or make a complaint regarding unacceptable behaviour in the workplace. Management will work with you to resolve the issue or complaint in a manner appropriate to the seriousness and nature of it. Management personnel are available by telephone or in person, and there are a range of officers for you to choose from within Golden Cross:

Sydney Office	Site Offices
Managing Director/CEO or Company Secretary	Exploration Manager or Managing Director/CEO

In order to facilitate the handling of the issue or complaint in a manner which is appropriate to the seriousness and nature of it, a management representative may:

- take notes;
- consult with another member of management (if appropriate);
- provide information on this Policy and the complaint procedure; and
- refer the issue or complaint to another member of management for investigation (if appropriate).

3.7.4 Disciplinary action

If after investigation a complaint is substantiated, Golden Cross will take appropriate action. If a person is found to have breached this Policy, that person may be subject to appropriate disciplinary action, which may include termination of employment or ending that person's engagement or relationship with Golden Cross.

3.7.5 Malicious or false complaints

If a person is found to have raised a malicious or false complaint against another person in order to prejudice that person, the false accuser will be subject to appropriate disciplinary action, which may include termination of employment or ending that person's engagement or relationship with Golden Cross.

3.8 Bullying Applications to the Fair Work Commission

Employees who feel they have been bullied in the workplace and there is an on-going threat of the bullying continuing are able to apply to the Fair Work Commission for orders to stop the bullying.

It is our expectation that you will follow Golden Cross' complaints procedure before lodging any complaint to the Fair Work Commission.

The Fair Work Commission will take into account the extent to which you have followed this complaints procedure when dealing with any bullying claim you make.

4 SOCIAL FUNCTIONS POLICY

4.1 Overview

Golden Cross organises a number of social functions each year to enhance the engagement of its staff and for you to enjoy the company of your colleagues in a relaxed environment. Social functions remain an integral part of staff and client relationships, at which you are representing Golden Cross.

All directors, employees and contractors of Golden Cross are required to comply with this Policy and all applicable Federal and State Laws while working for or representing the Company

4.2 Application

4.2.1 Who does this policy apply to?

This Policy applies to all Golden Cross directors and employees, whether full-time, part-time or casual, and other external attendees at Golden Cross social functions and events.

For the avoidance of doubt, the HSEC and Workplace Behaviour Policies also apply to all Golden Cross social functions and events, whether they are held at Golden Cross' offices or an alternative venue. While alcohol may be consumed at work functions all directors and employees must ensure they do not drink in excess. Directors and employees who are working or driving a company vehicle after the event must have an alcohol content of 0.000% before they commence work or driving. Unless you are driving a company vehicle you are not subject to alcohol and drug testing by the company at or immediately following a workplace social function.

4.2.2 What are social functions and events?

Social functions and events include, but are not limited to:

(a) Friday drinks;

(b) end-of-financial year and parties celebrating various religious festivals;

(c) Golden Cross client functions; and

(d) other functions you are invited to because of your involvement with Golden Cross.

4.2.3 What about when I am on-site?

When present on one of Golden Cross' project sites or camps, the site or camp rules with respect to health and safety will apply to you in precedence to this policy where the two policies are inconsistent.

4.3 General

When attending a Golden Cross social function or event, you should:

(a) remember that Golden Cross policies still apply to you;

(b) conduct yourself in a responsible and safe manner at all times; and

(c) take reasonable care of the facilities and equipment provided.

4.4 Alcohol and Drugs

4.4.1 What if alcohol is served or available?

Alcohol may be served or available at Golden Cross social functions and event. If you choose to consume alcohol, you:

(a) must do so responsibly;

(b) are encouraged to consume food;

(c) arrange safe transport when leaving the function or event; and

(d) must not perform any work for Golden Cross until such time as you are authorised to do so by Golden Cross.

4.4.2 What about drugs?

The possession, distribution, use or consumption of any recreational or illicit drugs is prohibited by law and is strictly prohibited at all Golden Cross social events and functions.

5. INFORMATION SERVICES POLICY

5.1 Overview

Golden Cross requires compliance with this Policy in order to protect its information. All directors, employees and contractors of Golden Cross are required to comply with this Policy and all applicable Federal and State Laws while working for or representing the Company

Your use of Information Services (IS) Tools (as defined below) is subject to this Policy and to Golden Cross' other policies and procedures, including Golden Cross' Workplace Behaviour Policy.

5.2 Application

5.2.1 Who does the Policy apply to?

This Policy applies to all Personnel who use IS Tools. This includes everyone who works at Golden Cross, including directors, employees, potential employees and contractors, regardless of whether they work full-time, part-time or as casuals.

If a contractor or potential employee reports to you, you must make them aware of this Policy.

5.2.2 What does the Policy apply to?

This Policy applies to use of the following information services tools (IS Tools):

- computers and electronic devices (e.g. personal computer) provided by Golden Cross;
- software, network tools, databases and electronic communication facilities (e.g. email accounts) provided by Golden Cross;
- telephones, 'smart' phones and voicemail facilities provided by Golden Cross; and
- internet and network access provided by Golden Cross.

5.3 Use of IS tools

5.3.1 What use of IS Tools is allowed?

IS Tools should be used for work-related communication and work-related purposes.

5.3.2 What personal use of IS Tools is allowed?

Limited personal use is allowed as long as it does not:

- breach this, or any other Policy;
- unreasonably interfere with the performance of your job;
- consume significant resources; or
- interfere with the rights or activities of other employees or third parties.

Professional association activities (such as AusIMM, SMEDG) are permitted with the authorization of the Managing Director/CEO.

5.3.3 What use of IS Tools is not allowed?

You must not use IS Tools for an inappropriate purpose. Inappropriate purposes include, but are not limited to, use of IS Tools:

- in breach of this Policy or any of Golden Cross' other policies;
- for social media communication;
- working on solely private documents and in particular saving private documents on the Golden Cross network (danger of introducing viruses);
- to bully or harass other people;
- for personal financial gain or profit;
- to solicit others for activities unrelated to Golden Cross' business, or in connection with political campaigns or lobbying;
- to communicate defamatory, obscene or offensive material;
- to access or download pornographic material;
- to gamble;
- to engage in online trading (e.g. E-bay);
- in connection with any infringement of another person's intellectual property rights (e.g., copyright, moral rights);
- to publish proprietary, classified or confidential information;
- to represent personal opinion as that of Golden Cross;
- in connection with any attempt to penetrate computer or network security of any company or other system, or unauthorised access (or attempted access) to any other person's computer, email or voicemail accounts or equipment;
- in connection with the breach or attempted breach of any law;
- to transmit any material in breach of any law or damaging to any person's or company's reputation;
- to download or open games or screen savers;
- unless Golden Cross has given its permission, to download software or executable files from the Internet;
- to use software if the use of that software has not been authorised by Golden Cross;
- to create a personal "home page" or other personal on-line service;
- to use AOL, MSN or other similar internet based messaging services;
- to send unsolicited commercial electronic messages to third parties; or
- to supply or offer to supply an address list (a list of electronic addresses) to any third party.

5.4 Monitoring use of IS Tools

5.4.1 Is your use of IS Tools monitored?

Golden Cross may monitor your use of IS Tools at any time. This surveillance is both intermittent and on-going and will comply with applicable laws. Golden Cross may also monitor past use, and material that you have deleted.

Golden Cross may record information regarding your use of IS Tools including:

- the participants involved;
- location;
- content;
- dates;
- times; and
- actions taken.

5.4.2 What happens to information regarding your use of IS Tools?

Information regarding your use of IS Tools may be made available to:

- Golden Cross management;
- Golden Cross' Human Resources team;
- your manager and/or
- State or Federal police.

5.5 Remote access and portable IS Tools

This Policy applies to remote access to the Golden Cross network and to IS Tools which are portable.

5.6 Handling IS Tools

You must take due care of any IS Tool which you use.

If you are issued with a portable IS Tool it must be kept secure at all times.

If an IS Tool is lost, stolen or damaged through your neglect you may be required to contribute towards replacement costs.

All IS Tools are Golden Cross' property and must be returned to Golden Cross upon request or upon termination of your employment.

5.7 Virus protection and prevention

To help protect Golden Cross' computer network from viruses you must:

- not load software from any source without specific authority from Golden Cross;

- shut down your computer overnight in order to receive virus protection updates;
- immediately act on any instruction from Golden Cross, including to reboot the computer; and
- not open any attachments from an unknown or non-work related source.

5.8 What if I bring my own IS Tool?

You may be required to use your own IS Tool/s in the course of your duties.

At any time during your employment or engagement and on the termination of your employment or engagement, you agree to allow Golden Cross to access any IS Tool/s in your possession or control that have been used to perform your duties, to enable Golden Cross to remove any Confidential Information or Intellectual Property which may be stored within or accessed from it.

For the purpose of this policy:

- **Confidential Information** includes, but is not limited to, any information in respect of Golden Cross or Golden Cross' business (including, but not limited to, any idea, concept, process or know how) which is not in the public domain (other than as a result of a breach of the Golden Cross' confidence) which:
  (a) comes to your notice in the course of your employment or engagement; or
  (b) is generated by you in the course of performing your duties.

- **Intellectual Property** means all present and future rights to intellectual property of every kind without limitation, including any trade marks (whether registered or common law trade marks), branding, business names, domain names, designs, copyright, inventions, discoveries, trade secrets, secret processes, know-how, concepts, ideas, information, processes, data, formulae, any corresponding property rights under the laws of any jurisdiction and any rights in respect of them and including any improvements.

5.9 Breach of this Policy

If you breach this Policy appropriate disciplinary action will be taken against you. Disciplinary action may include:

- blocking electronic information (including emails and internet websites);
- removing unauthorised software;
- revoking your access to IS Tools;
- counselling;
- a formal warning; or
- termination of your employment.

6 SECURITIES TRADING POLICY

6.1 Introduction

Golden Cross Resources Limited (Company or GCR) Securities Trading Policy (Policy) as required by the Australian Securities Exchange (ASX) Listing Rules sets guidelines for:

a) when Directors, officers, senior management, other employees, consultants and contractors of the Company (and any family member or associate over whom they have influence) may deal in the Company's Securities;

b) when Directors, officers, senior management, other employees, consultants and contractors of the Company may deal in listed securities of another entity (because they may obtain inside information about another entity's securities while performing their duties for the Company); and

c) procedures to reduce the risk of insider trading.

GCR Securities includes listed shares in GCR, options over those shares and any other financial products of GCR traded on any securities exchange.

6.2 Who does this Policy apply to?

This Policy applies to:

a) all Executive and Non-Executive Directors, officers, employees, contractors and consultants (collectively, Personnel) of the Company, and its subsidiaries; and

b) in relation to Blackout Periods (see paragraph 6.6.2), Directors and Senior Executives. Senior Executives being key management personnel, i.e. direct reports to the Managing Director/CEO (collectively, Designated Persons) of the Company, and its subsidiaries (and any family member or associate over whom they have influence).

6.3 Insider Trading - the Law

The principal insider trading prohibition in Australian law is contained in section 1043A of the Corporations Act 2001.

Inside Information is information relating to the Company that is not generally available but, if the information was generally available, a reasonable person would expect that information to have a material effect on the price or value of the Company's Securities. Further detail on information that could have a material effect on the price or value of the Company's securities, including examples, is included in the Company's Continuous Disclosure Policy.

Section 1043A prohibits a person (an Insider) who is in possession of Inside Information from:

a) applying for, acquiring, disposing of or entering into an agreement to apply for, acquire or dispose of the Company's Securities;
b) procuring another person to apply for, acquire, dispose of or enter into an agreement to apply for, acquire or dispose of the Company's Securities; or
c) directly or indirectly communicating the Inside Information to another person when the Insider knows, or ought reasonably to know, that the other person would or would be likely to:

    (i) apply for, acquire, dispose of or enter into an agreement to apply for, acquire or dispose of the Company's Securities; or

    (ii) procure another person to apply for, acquire, dispose of or enter into an agreement to apply for, acquire or dispose of the Company's Securities.

Insider trading is a criminal offence. It is punishable by substantial fines or imprisonment or both. A company may also be liable if an employee or Director engages in insider trading.

Insider trading may also attract civil penalties. A court may impose substantial pecuniary penalties for insider trading and order payment of compensation to persons who suffer loss or damage because of insider trading.

Information is generally available if it:

a) is readily observable;
b) has been made known in a manner (e.g. released to the ASX) likely to bring it to the attention of persons who commonly invest in Securities and a reasonable period for that information to be disseminated has elapsed since it was made known.

All employees and others impacted by this Policy are reminded that;

a) Notwithstanding the content of this Policy, the company prohibits any conduct which would breach insider trading laws.
b) Approval or clearance to trade by the company is not an endorsement of the proposed trade and persons undertaking the trading are individually responsible for their investment decisions and compliance with insider trading laws
c) If a person comes into possession of inside information after receiving clearance to trade then they must not trade despite having received that clearance.

6.4 When Personnel May Deal in Securities

Dealing in the Company's Securities includes but is not limited to buying, selling and transferring the Company's Securities.

Personnel (who are not Designated Persons) may deal in GCR Securities or the listed Securities of another entity if he or she does not have information that he or she knows, or ought reasonably to know, is Inside Information in relation to GCR Securities or those Securities of the other entity.

6.5 When Personnel May Not Deal In Securities

Personnel (who are not Designated Persons) must **not** deal or procure a third party to deal in GCR Securities if he or she has information that he or she knows, or ought reasonably to know, is **Inside Information** in relation to GCR Securities.

6.6 Designated Persons Dealing In the Company's Securities

6.6.1 Designated Persons

Designated Persons are routinely in possession of Inside Information (which, if generally available would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell the Company's Securities).

As such, Designated Persons (or any family member or associate over whom they have influence) are prohibited from dealing in the Company Securities during a Blackout Period.

Designated Persons at GCR are;

- Board members,
- Managing Director or Chief Executive Officer (CEO),
- Senior personnel reporting to the Managing Director/CEO,
- Any other officer of GCR who is notified by the Company they are a Designated Person.

6.6.2 Blackout Periods

The Blackout Period for the purposes of the ASX Listing Rules is a "Closed Period".

No trading in the Company Securities may occur during a **Blackout Period** (**Closed Periods**) without the written permission of the Managing Director/CEO (**MD/CEO**) (or in the case of the MD/CEO, the Chairman or in the case of the Chairman, an Independent Non-Executive Director). Permission will ordinarily only be granted in exceptional circumstances (see section 6.6.4 below).

Outside a prohibited Blackout Period, the laws prohibiting insider trading continue to apply to Designated Persons. Refer to section 6.3 of this Policy for further details.

Unless the Board otherwise directs, in its absolute discretion, Blackout Periods will occur at the following times:

a) for a period of 2 weeks before the public release by the Company of its quarterly reports to the ASX, up to the commencement of the first trading day after such release;

b) for a period of 2 weeks before the public release by the Company of its annual and half year results to the ASX, up to the commencement of the first trading day after such release;
c) for a period of 2 weeks before the Company's Annual General Meeting (AGM) up to the commencement of the first trading day after the AGM;
d) for a period of 2 weeks before the issue of a disclosure document, e.g. prospectus, up to the commencement of the first trading day after such release; and
e) such other periods the Board may notify in writing from time to time (Other Black Out Period).

In determining whether or not an Other Blackout Period will either apply or cease, the Board may request all Designated Persons to confirm to the Company Secretary whether they are aware (as defined in the ASX Listing Rules) of any Inside Information.

6.6.3 Notice of Intent and Approval to Deal in the Company Securities

a) Designated Persons (or any family member or associate over whom they have influence) are prohibited from dealing in the Company's Securities at any time, including in exceptional circumstances set out in section 6.6.4, without receiving prior written clearance from the Managing Director/CEO (and the Chairman in the case of the MD/CEO and an Independent Non-Executive Director in the case of the Chairman).

b) At least one (1) day prior to an intended trade in the Company's Securities a Designated Person must provide prior written notice of their intent to deal in the Company's Securities. The Managing Director (or Chairman or Company Secretary) will consider the notice and circumstances of the Company and if appropriate provide Clearance for the trade(s). This approval will generally provide a period when trading by the Designated Person is approved.

It is anticipated that, as a general rule, prior written clearance will not be given if the proposed Trade in Securities is to occur within the two (2) week period prior to:

- the public release to the ASX of GCR's annual, half yearly or quarterly reports or accounts; or
- GCR's annual general meeting.

It is also anticipated that, as a general rule, prior written clearance will not be given where in the opinion of the Board the Individual is involved in short term trading or "Day Trading" of GCR shares. Individuals are encouraged to invest in GCR, however short term speculative trading in Securities is discouraged.

c) A copy of the notice and Clearance (if given) will be sent to the Company Secretary for the official file.

Even if an Individual has received clearance to Trade in Securities under clause 6.6.3, the Individual will still be engaging in Insider Trading if he or she acts contrary to the prohibition in clauses 6.5 and 6.6 above.

Clearance does not provide any guarantee that the proposed Trade in Securities does not constitute Insider Trading. Individuals must be aware at all times of their obligations not to Trade in Securities while they possess Inside Information. Even Trade in Securities in the period immediately following:

- the public release to the ASX of GCR's annual, half yearly or quarterly reports or accounts; or
- GCR's annual general meeting,

will amount to Insider Trading if the Individual who is partaking in the Trade in Securities possesses Inside Information.

d) Designated Persons must provide a copy of the trade receipts to the Company Secretary within 2 days of the closure of the Clearance period.

6.6.4 Exceptional Circumstances

Any Designated Person, who is not in possession of Inside Information affecting Securities, may be given prior written approval to sell or otherwise dispose of Securities during a Blackout Period where there are exceptional circumstances. Exceptional circumstances may include:

(a) severe financial hardship which means a Designated Person has a pressing financial commitment that cannot be satisfied otherwise than by selling the Securities;

(b) if a Designated Person is required by a court order, or there are court enforceable undertakings to transfer or sell the Securities or there is some other overriding legal or regulatory requirement for the Designated Person to do so; or

(c) a situation determined by the Chairman (or in the case of the Chairman an Independent Non-Executive Director) to be an exceptional circumstance.

When requesting prior written approval to sell or otherwise dispose of Securities during a Blackout Period, the Designated Person must submit an application in writing (which can be by email) to the MD, generally through the Company Secretary (in the case of the MD an application in writing (which can be by email) to the Chairman) including the reasons for requesting approval. Approval, if granted, must be in writing (which can be by email) and must specify a time period for which the approval applies.

6.7 Excluded Trading

Trading that is excluded from the restrictions in this Policy includes:

- transfers of Securities already held into a superannuation fund or other saving scheme in which the member of Personnel is a beneficiary;

- an investment in, or trading units of, a fund or other scheme (other than a scheme only investing in the Company's Securities) where the assets of the fund or other scheme are invested at the discretion of a third party;

- where a Designated Person is a trustee, trading in Securities by that trust provided the Designated Person is not a beneficiary of the trust and any decision to trade during a Blackout Period is taken by the other trustees or by the investment managers independently of the Designated Person;

- undertakings to accept, or the acceptance of, a takeover offer;

- trading under an offer or invitation made to all or most of the security holders, such as, a rights issue, a security purchase plan, a dividend or distribution investment plan (DRP) and an equal access buy-back, where the plan that determines the timing and structure of the offer has been approved by the Board;

- a disposal of securities of the entity that is the result of a secured lender exercising their rights, for example, under a margin lending arrangement, subject to section 6.8 below; and

- the exercise (but not the sale of securities following exercise) of an option or a right under an employee incentive scheme, or the conversion of a convertible security, where the final date for the exercise of the option or right, or the conversion of the security, falls during a Blackout Period and where the Designated Person could not reasonably have been able to exercise at a time when free to do so; and

- trading under a non-discretionary trading plan for which prior written clearance has been provided in accordance with procedures set out in this Policy and where:

    - the Designated Person did not enter into the plan or amend the plan during a Blackout Period; and

    - the trading plan does not permit Designated Persons to exercise any influence or discretion over how, when, or whether to trade.

6.8 Restrictions on Margin Loans

Margin lending poses special risks to the compliance of Designated Persons with this Policy, particularly where the terms of the margin lending arrangements may place the Designated Person in a position of conflict with their obligations under this Policy and/or with the insider trading laws (for example, if a call is made under the arrangements, which results in GCR securities being sold while the Designated Person possesses inside information).

Without prior approval in the manner set out in section 6.6, Designated Persons must not enter into agreements that provide lenders with rights over their interests in GCR securities (eg for the disposal of GCR securities or options that is the result of a secured lender exercising their rights under a margin lending agreement).

6.9 Anti-hedging Policy

Directors and Senior Executives are not permitted to enter into transactions with Securities (or any derivative thereof) in associated products which limit the economic risk of any unvested entitlements under any equity-based remuneration schemes awarded under any equity-based remuneration scheme currently in operation or which will be offered by the Company in the future. However, Directors and senior executives will consult with the Chairman if they are considering, or if they are not sure, as to whether entering into transactions may limit the economic risk of unvested entitlements they may have.

6.10 Conflicts of interest

The Corporations Act 2001 also provides that a director, secretary or other officer or employee of a corporation must not improperly use their position to gain an advantage for themselves.

If you are concerned that a situation may give rise to a conflict between your personal interests and GCR's interests, you should disclose the circumstances immediately to your manager. You should not proceed any further with your proposed course of action until written permission has been granted by the Managing Director/CEO.

6.11 Disclosure to ASX

Listing Rule 12.9 of the ASX Listing Rules requires this policy to be disclosed to the ASX. Where GCR makes a material change to this Policy, the amended policy must be provided to ASX within 5 (five) business days of the material changes taking effect, in accordance with Listing Rule 12.10.

In addition, if a change to a notifiable interest of a GCR Director occurs during a Closed Period, GCR must tell ASX (in its Appendix 3Y filing) that this is the case, whether prior written clearance for the relevant dealing was provided and the date of such clearance.

6.12 Breaches of this Policy

Strict compliance with this policy is a condition of employment. Breaches of this policy will be subject to disciplinary action, which may include termination of employment.

6.13 Review of this Policy

This Policy will be reviewed regularly by the Company's Directors having regard to the changing circumstances of the Company and any changes to this Policy will be notified to affected persons in writing. If Directors and Senior Executives have any comments or views concerning the operation or effectiveness of this Policy, they should be communicated to the Company Secretary.

7 WHISTLE BLOWER POLICY

7.1 Introduction

Golden Cross is committed to maintaining full compliance with all applicable laws, rules and regulations, corporate reporting and disclosure, accounting practices, accounting controls, auditing practices and other matters relating to fraud against shareholders (collectively **Accounting Concerns**) and preventing conduct that falls below the highest standards of business conduct and ethics (**Unacceptable Conduct**). The key relevant legislation is the Corporations Act 2001, specifically the "whistleblower" provisions of Sections 1317AA to 1317AE. The Act sets out the circumstances in which a discloser will qualify for statutory protection where he/she discloses information which indicates that the Company or an officer or employee may have breached the Act.

The Act prohibits people from causing a detriment or threatening to cause a detriment to a discloser, and gives the discloser a right to claim compensation if they suffer damage as a result.

7.1.1 Definition

Accounting Concerns and Unacceptable Conduct are intended to have broad and comprehensive meanings and include any matter, which in the view of a complainant, is illegal, unethical, contrary to Golden Cross' policies, or in some other manner, not proper or right.

7.1.2 Examples of Accounting Concerns

Accounting Concerns can include:

- Violation of any applicable law, rule or regulation that relates to corporate reporting or disclosure;
- Violation of any of Golden Cross' policies;
- Fraud or deliberate error in the preparation, evaluation, review or audit of any of Golden Cross' financial statements, or those of any of its subsidiaries;
- Fraud or deliberate error in the recording and maintaining of Golden Cross' financial records, or those of any of its subsidiaries;
- Deficiencies or non-compliance with Golden Cross', or any of its subsidiaries', internal policies and controls;
- Misrepresentations or false statements made by or to a director, officer, consultant or employee of Golden Cross, or any of its subsidiaries, concerning a matter contained in its financial records, reports or audit reports; or
- Deviation from full and fair reporting of Golden Cross' consolidated financial condition.

7.1.3 Examples of Unacceptable Conduct

Unacceptable Conduct includes any conduct that:

- is dishonest, fraudulent or corrupt;
- is illegal such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law;
- is potentially damaging to Golden Cross, a Golden Cross employee or a third party such as unsafe work practices, environmental damage, health risks or substantial wasting of company resources;
- amounts to an abuse of authority;
- may cause financial loss to Golden Cross or damage its reputation or be otherwise detrimental to Golden Cross' interests;
- involves bribery or a conflict of interest;
- involves any other kind of serious impropriety; or
- involves harassment, discrimination, victimisation or bullying.

7.2 Communication

To ensure that all managers, employees and contractors ('Staff') of Golden Cross are aware of the Policy, a copy of the Policy will be available on Golden Cross' website for their review or upon request to the Golden Cross' Company Secretary. All Staff will be informed whenever significant changes are made. New Staff will be provided with a copy of this Policy and will be educated about its importance.

7.3 Reporting of Alleged Violations and Complaints

7.3.1 Reporting Procedure

Any Staff member who has an Accounting Concern regarding Golden Cross, or any of its subsidiaries, may submit his/her concern to the Chair of the Audit Committee.

Any Staff member who becomes aware of Unacceptable Conduct regarding Golden Cross, or any of its subsidiaries, may submit his/her concern to the Managing Director/CEO or Company Secretary.

7.3.2 Confidentiality

All submissions to the Chair of the Audit Committee, Managing Director/CEO or Company Secretary shall be treated on a confidential and anonymous basis wherever legally required, practical and appropriate. It is important to note that the Act requires that the discloser gives their name and hence it may not always be possible for the Company to ensure anonymity, especially in cases where the discloser is implicated in a breach.

7.3.4 No adverse consequences

The Company will not tolerate any reprisals against a Staff member making a submission in good faith regarding an Accounting Concern as set out in this Policy.

A submission regarding an Accounting Concern or Unacceptable Conduct may be made by a Staff member without fear of dismissal, disciplinary action or retaliation of any kind for making the submission. Golden Cross will not discharge, discipline, demote, suspend, threaten or in any manner discriminate against any person who submits in good faith an Accounting Concern, a report of Unacceptable Conduct or provides assistance to the Audit Committee, the Company Secretary, management or any other person or group, including any governmental, regulatory or law enforcement body, investigating an Accounting Concern or Unacceptable Conduct.

For clarity, it should be noted that a person making a submission, who is subsequently implicated in the Accounting Concern or Unacceptable Conduct, will be subject to the same disciplinary action as if they had not made the submission.

7.3.5 Treatment of Accounting Concerns Submissions

Accounting Concerns will be reviewed as soon as possible by the Audit Committee with the assistance and direction of whomever the Audit Committee thinks appropriate including, but not limited to, external legal counsel. The Audit Committee shall implement such corrective measures and do such things in an expeditious manner as it deems necessary or desirable to address the Accounting Concern.

Where possible and when determined to be appropriate by the Audit Committee, notice of any such corrective measures will be given to the person who submitted the Accounting Concern.

7.3.6 Treatment of Unacceptable Conduct Submissions

Unacceptable Conduct will be reviewed as soon as possible by the Company Secretary with the assistance and direction of whomever the Company Secretary thinks appropriate including, but not limited to, external legal counsel. The Company Secretary shall implement such corrective measures and do such things in an expeditious manner as is deemed necessary or desirable to address the Unacceptable Conduct.

Where possible and when determined to be appropriate by the Company Secretary, notice of any such corrective measures will be given to the person who submitted the report of Unacceptable Conduct.

7.3.7 Retention of Records

The Audit Committee shall retain all records relating to any Accounting Concern or report of a retaliatory act, including the investigation of any such report, for a period judged to be appropriate based upon the merits of the submission.

The Company Secretary shall retain all records relating to any Unacceptable Conduct or report of a retaliatory act, including the investigation of any such report, for a period judged to be appropriate based upon the merits of the submission.

7.4 Policy Review

The Audit Committee and the Company Secretary will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in providing a confidential and anonymous procedure to report violations or complaints regarding Accounting Concerns and Unacceptable Conduct.

7.5 Queries

If you have any questions about how this Policy should be followed in a particular case, please contact the Chair of the Audit Committee or the Company Secretary.

8 EXTERNAL COMMUNICATION POLICY

8.1 Definitions

For the purposes of this Policy:

- **ASX** means the Australian Stock Exchange.
- **Board** means Golden Cross' Board of Directors.
- **Corporations Act** means the *Corporations Act 2001* (Cth).
- **Designated Spokesperson** has the meaning given under cl 8.2

8.2 Designated Spokesperson

Golden Cross designates a limited number of spokespersons to be responsible for communication with the investment community, regulators or the media (**Designated Spokesperson**). The matrix below specifies which authorised spokespersons may discuss material information with the institutional and individual investment community:

MATRIX OF DELEGATED AUTHORITIES

	Communicate on behalf of Golden Cross to:		
	Media	**Analysts**	**Shareholders**
Directors	No	Yes (2)	Yes (1)
Chairman	No	Yes (3)	Yes (3)
Managing Director/CEO	Yes (1)	Yes (1)	Yes (1)
Executive Staff:	No	No	No
CFO & Company Secretary	No	No	No
Exploration Manager	No	No	No
Executive PA/Office Manager	No	No	Yes(4)

Notes:

1. ASX announcements to be reviewed by the Chairman and Managing Director/CEO and if thought appropriate, the Board, before being released to ASX.

Where announcements are of a significant nature, Board review and approval should be sought prior to the announcement being released. Such approval to be given within 24 hours.

2. With the prior approval of the Chairman.

3. After prior consultation with the Managing Director/CEO

4. With the prior approval of the Managing Director/CEO

8.2.1 Delegated authority

Individuals holding offices with delegated authority may, from time to time, designate others within Golden Cross to speak on behalf of Golden Cross as back-ups or to respond to specific inquiries, including but not limited to an investor conference, a group meeting or a one-on-one meeting. Following the occurrence of the limited, specific communication, the employee's authorisation shall expire.

8.2.2 What if I am not authorised?

Employees who are not authorised spokespersons must not respond under any circumstances to enquiries from the investment community, the media or others, unless specifically asked to do so by an authorised spokesperson. Employees and company representatives (other than the above authorised spokespersons) receiving any enquiries from the investment community shall not respond to such inquiries other than to refer the enquirer to the Managing Director/CEO.

8.3 News Releases

Annual and interim financial results will be publicly released following Board approval of the financial statements. The default method of receiving Golden Cross' annual report is electronically (on the ASX's website or by email). A printed copy of the annual report is sent to shareholders who elect to receive one by contacting Golden Cross' share registry.

News releases may be disseminated through an approved news service that provides simultaneous national and/or international distribution. News releases will also be posted on Golden Cross' website and are to be made subject to the general legal disclaimer provisions posted on the website.

8.4 ASX Announcements

Golden Cross makes announcements to the ASX in accordance with the Listing Rules and the Corporations Act.

Announcements made by Golden Cross to the ASX are, subject to applicable securities laws, available to shareholders:

(a) on the 'Investor' section of Golden Cross' website;

(b) under the 'Company Announcements' section of the ASX website; and

(c) by email notification (when shareholders provide Golden Cross with their email address and elect to be notified of all Golden Cross' announcements by email).

8.5 Annual General Meetings

(a) The notice of meeting will be mailed to all shareholders prior to Golden Cross' annual general meetings within the timeframe set by the Corporations Act and the Golden Cross' constitution;

(b) Shareholders at the annual general meeting are encouraged to ask both Golden Cross and its auditor questions regarding the Golden Cross' governance and business. Shareholders may attend the meeting in person (including by any relevant technological means made available by Golden Cross) or by proxy, representative or attorney;

(c) In addition, the chairman's address to the annual general meeting and presentations used will be made available on Golden Cross website and with ASX immediately after the annual general meeting.

8.6 Annual Report

Golden Cross' annual report contains key financial information about Golden Cross, as well as important operating and corporate information. The default method of receiving Golden Cross' annual report is electronically (on Golden Cross' website or by email). A printed copy of the annual report is sent to shareholders who elect to receive one by contacting Golden Cross' share registry.

8.7 Corporate Governance

(a) In accordance with Recommendation 6.1 of the ASX Corporate Governance Council Principles and Recommendations (3rd ed), Golden Cross has a 'Corporate Governance' section on its website;

(b) Golden Cross' annual corporate governance statement is prepared in accordance with the Listing Rules. It is contained in or accompanies the annual report each year and

also is or will be available under the 'Corporate Governance' section of Golden Cross' website.

8.8 Electronic Communication

Shareholders may opt to receive communications from, and send communications to, Golden Cross and its security registry electronically by contacting the Company Secretary or Golden Cross' share registry as applicable.

8.9 Contact with Analysts, Investors and the Media

8.9.1 Disclosure to analysts, investors and the media

Disclosure in individual or group meetings does not constitute adequate disclosure of information that is considered material non-public information. If Golden Cross intends to announce material information at an analyst or shareholder meeting or a press conference or conference call, the announcement must be preceded by an ASX announcement.

Golden Cross recognises that meetings with analysts and significant investors are an important element of investor relations. Golden Cross will meet with analysts and investors on an individual or small group basis as needed from time to time to discuss matters concerning Golden Cross that have been released to the market. Golden Cross will initiate contact or respond to analyst and investor calls in a timely, consistent and accurate fashion in accordance with this disclosure policy. Golden Cross policy at these meetings is that:

(a) any material information being presented to analysts or investors must first be provided to the relevant Designated Spokesperson for approval;

(b) all investors are to be treated in a balanced and fair fashion and one-on-one and group briefings between Golden Cross and analysts or investors must be restricted to discussions of previously disclosed information;

(c) in responding to an analyst or investor query, only previously released information may be discussed and all responses must be factual and balanced;

(d) any questions raised in relation to price sensitive issues not already disclosed to the market will not be answered or will be taken on notice; and

(e) if a question is taken on notice and the answer would involve the release of price sensitive information, the information as with all price sensitive information must be released through the ASX before responding.

Golden Cross will provide only non-material released information through individual and group meetings, in addition to regular publicly disclosed information, recognizing that an analyst or investor may construct this information into a mosaic that could result in material information. Golden Cross cannot alter the materiality of information by breaking down the information into smaller, non-material components.

The relevant Designated Spokesperson will keep a record of meetings with analysts and investors. At or after meetings, the relevant Designated Spokesperson must consider the matters discussed at the meetings to ascertain whether any price sensitive information was inadvertently disclosed.

8.9.2 Reviewing Analysts Reports and Models

It is Golden Cross policy to review, upon request, analysts' draft research reports or models. Draft analyst reports and financial models may be reviewed and commented upon only by the authorised spokespersons for disclosures to the investment community. Golden Cross comments on these drafts will be limited to the following:

- Corrections of inaccurate historical public information;
- Deviations from information and projections Golden Cross has publicly issued, specifying, without reaffirming, the date and/or occasion of such issuance;
- Non-material information, whether in the public domain or not; and
- Industry-related information.

It is Golden Cross policy, when an analyst enquires with respect to his/her estimates, to question an analyst's assumptions if the estimate is a significant outlier among the range of estimates and/or Golden Cross' published financial guidance.

Golden Cross will limit its comments in responding to such inquiries to non-material information. Golden Cross will not confirm, or attempt to influence, an analyst's opinions or conclusions. It should specifically be noted that Golden Cross has not undertaken the obligation to update any forward-looking statement that it makes or has made, and that Golden Cross, as a matter of policy, does not "embrace," "endorse" or state that it "is comfortable with" any analyst's report and/or financial model as a result of Golden Cross' review process. In order to avoid appearing to endorse an analyst's report or model, Golden Cross will provide its comments orally or will attach a disclaimer to written comments to indicate the report was reviewed only for factual accuracy.

8.9.3 Distributing Analysts Reports

Analyst reports are proprietary products of the analyst's firm. Golden Cross may post on its website a complete list, regardless of the recommendation, of all the investment firms and analysts who provide research coverage on Golden Cross. If provided, such list will not include links to the analysts' or any other third party web sites or publications. Shareholders need to contact the analyst directly and not through Golden Cross. Re-circulating a report by an analyst may be viewed as an endorsement of the report by Golden Cross and is not permitted by ASX. For these reasons, Golden Cross will not provide analyst reports through any means to persons outside Golden Cross, including posting such information on its website.

Notwithstanding the foregoing, Golden Cross will distribute analyst's reports to its Directors and senior officers to monitor communications regarding Golden Cross, and to assist them in determining how the marketplace values Golden Cross.

8.10 Forward-Looking Information

All public disclosures of forward-looking information, including projections of future earnings or operational performance, shall be accompanied by appropriate cautionary language. ASX do not permit Scoping Study financial projections to be released, and any financial projections in a Feasibility Study cannot include projections based on Inferred Mineral Resources.

Subsequent disclosures of forward-looking information may only be based upon information Golden Cross has publicly disclosed, non-material information, whether in the public domain or not, and/or industry-related information, and each case in compliance with the following sentence.

Except to the extent imposed by law, Golden Cross shall not undertake any obligation to update any forward looking information, and Golden Cross will not respond, except by means of an appropriate public disclosure (as provided for in this Policy), to any inquiries or rumours seeking re-affirmation of such information at any date subsequent to the date that such information was originally provided.

Should Golden Cross elect to disclose forward-looking information in continuous disclosure documents, speeches, conference calls, etc.; the following guidelines will be observed:

- The information, if deemed material, will be broadly disseminated in accordance with this Disclosure Policy.
- The information will be clearly identified as forward looking.
- Golden Cross will identify all material assumptions used in the preparation of the forward-looking information.
- The information will be accompanied by a statement that identifies, in very specific terms, the risks and uncertainties that may cause the actual results to differ materially from those projected in the statement, including a sensitivity analysis to indicate the extent to which different business conditions from the underlying assumptions may affect the actual outcome.
- The information will be accompanied by a statement that disclaims Golden Cross' intention or obligation to update or revise the forward-looking information, whether as a result of new information, future events or otherwise. Notwithstanding this disclaimer, should subsequent events prove past statements about current trends to be materially off target, Golden Cross may choose to issue a news release explaining the reasons for the difference. In this case, Golden Cross will update its guidance on the anticipated impact on revenue and earnings (or other key metrics).

If Golden Cross has issued a forecast or projection in connection with an offering document covered by applicable securities laws, Golden Cross will update that forecast or projection periodically, as required by applicable securities laws.

8.11 Managing Expectations

Golden Cross will try to ensure, through its regular public dissemination of quantitative and qualitative information that analysts' estimates are in line with its own expectations. Golden Cross will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with analysts' models and earnings estimates.

If Golden Cross has determined that it will be reporting results materially below or above publicly held expectations, it will disclose this information in accordance with this Disclosure Policy in order to enable discussion without risk of selective disclosure.

9 REDUNDANCY

9.1 Overview

Redundancy is initiated when Golden Cross does not need an employee's job to be done by anyone or due to a change in business circumstances, such as insolvency or bankruptcy. Golden Cross shall strive to ensure that any redundancy is performed in a fair and compassionate way with the employee being given every opportunity to be re-deployed in Golden Cross to another suitable position.

An employee is not entitled to redundancy payment in the following situations:

- where the employee is transferred to another entity or mine site, solely or partly owned by Golden Cross, providing that the terms and conditions of employment are not less favourable to those the employee was employed under prior to the transfer;
- in cases of succession, assignment or transmission of a business, where the employee is offered suitable alternative employment with the new owner; or
- where Golden Cross secures an offer of other suitable alternative employment for the employee.

GCR will, as a minimum, meet all legislative requirements for redundancies notably the *Fair Work Act 2009* (Cth). Redundancy provisions will take into account the current size and financial position of the Company.

9.2 Objective

The objective of this Policy is to provide employees, whose positions have been made redundant, with the assistance and support to source alternative positions preferably within Golden Cross. If no alternative positions are available the Policy aims to provide the employee with a fair and reasonable redundancy package that gives due regard to the employee's length of service to Golden Cross and their employment entitlements at the time of termination.

9.3 Purpose

The purpose of this Policy is to outline the steps involved in making a position redundant and the applicable payments.

9.4 Scope

This Policy only applies to permanent employees of Golden Cross, except where redundancy terms and conditions have been negotiated as part of an industrial instrument. An industrial instrument dealing with redundancy will wholly displace this Policy for the relevant employees.

This Policy does not apply to employees who are employed under a fixed term or task arrangement or on a casual / temporary basis.

9.5 Definitions

9.5.1 Redundancy

Redundancy occurs when an employee's employment is terminated at Golden Cross' initiative because Golden Cross no longer requires that job to be done by anyone.

9.5.2 Examples of when a redundancy may occur

- Takeover resulting in loss of employment;
- Reduction in employment needs as a result of economic circumstances;
- Reduction in employment needs as a result of the closure or winding down of a business operation or a mine;
- Reduction in employment needs due to a change of technology which makes the position the employee performed redundant;
- An overall staff reduction (*e.g.*, downsizing, localisation);
- Restructure of Golden Cross; or
- Other genuine operational requirements of the business.

9.5.3 Permanent Employee

A permanent employee is an employee who is engaged by Golden Cross to carry out their duties for a non-defined period and who is the incumbent in a permanent position.

9.5.4 Fixed Term Contract Employee

A fixed term contract employee is an employee who is employed to perform a specific project or a set of defined tasks for a fixed term. On completion of this term, the employee's employment will conclude and the employee is not entitled to any redundancy payments.

9.5.5 Fixed Task Contract Employee

A fixed task contract employee is an employee who is employed to perform a defined task or a set of defined tasks. On completion of these tasks, the employee's employment will conclude and the employee is not entitled to any redundancy payments.

9.5.6 Casual / Temporary Employee

A casual or temporary employee is an employee who is engaged on an hourly or daily rate. Casual employees are generally not entitled to leave entitlements and are compensated for this with a casual loading. Casuals are not entitled to redundancy pay on termination of the casual arrangement, except as dictated by legislation.

9.5.7 Weeks of Pay

For the purpose of calculating redundancy pay (see Clause 9.10) weeks of pay means an employee's base salary, excluding:

- overtime;
- penalty rates;
- disability allowances;
- shift allowances;
- special rates;
- fares and travelling time allowances;
- bonuses; and
- any other ancillary payments of a like nature.

9.6 Superannuation

The treatment of superannuation for the purpose of redundancy is governed by the rules of the applicable superannuation fund. Employees should contact their superannuation fund for information. It is strongly recommended that employees consult with their financial advisor in relation to any financial decisions.

9.7 Period of Notice

Employees who are made redundant will be entitled to the greater of 4 weeks' notice or their contractual or other notice entitlement.

In recognition of years of service to GCR employees with more than 4 years of continuous service will receive an additional week of notice for every year of completed service in excess of 4 years up to a maximum of 12 weeks.

Completed Years of Continuous Service	Minimum Notice Period for Redundancy
1	4
2	4
3	4
4	4
5	5
6	6
>6 and <12	1 week for every completed year of service
>12	12

For the avoidance of doubt an employee with a Notice Period in their contract in excess of the Minimum Notice Period will be entitled to the contractual amount only.

9.8 Time off During Notice Period

In most cases where an employee has been made redundant, payment will be made in lieu of notice. However, there may be circumstances where this is not practical or desirable. In these circumstances the employee will be entitled to time off with pay for the purpose of seeking other employment. This would not normally be more than one day per week. The time will be taken at a time convenient to the employee after consultation with their supervisor.

9.9 Payment in Lieu of Notice

Payment in lieu of notice may be made to the employee in the event Golden Cross does not require the employee to work out the notice period. In certain circumstances Golden Cross may elect for the notice period to be partly worked and partly paid in lieu.

The payment in lieu should be equal to what the employee would have received had they worked to the end of the notice period. This should be calculated on the basis of:

- the employee's ordinary hours of work (even if they are not standard hours);
- the amounts ordinarily payable to the employee in respect of those hours, including for example, allowances, loading and penalties; and
- any other amounts payable under the employee's contract of employment.

9.10 Redundancy Pay

As the Company has less than 15 employees, pursuant to the *Fair Work Act 2009* (Cth) it is not required to make redundancy provisions for employees and given the financial position of GCR the Board has determined no redundancy provisions should apply. However, GCR will use all reasonable endeavours to facilitate treatment of any termination payment by the ATO as an eligible termination payment.

Employees will not be entitled to a redundancy payment where:

- suitable alternative employment is found as set out in clause 9.1;
- their employment is terminated for serious misconduct;
- there is a more generous entitlement under the employee's contract of employment;
- their employment was governed by a registered training arrangement (including apprentices and trainees);
- they are employed on a casual basis;
- they are employed on a fixed task or fixed term basis; or
- in any other circumstances where the Employee would not be entitled to a redundancy payment under the *Fair Work Act 2009* (Cth).

9.11 Leave entitlements

An employee whose position has been made redundant shall be paid out their accrued annual leave and long service leave entitlements in accordance with legislative requirements.

Employees who are voluntarily leaving Golden Cross Resources will be invited to participate in an exit interview. This will assist with the identification of any significant issues, which may need to be addressed.

10. ACKNOWLEDGMENT

As part of their induction all GCR employees will be provided with a copy of the Company's Workplace Policies and sign the acknowledgement form below prior to commencing work.

I acknowledge that I have read, accept and agree to be bound by the terms and conditions of Golden Cross' Workplace Policies and all Federal and State Laws as part of my employment with Golden Cross Resources Limited:

SIGNED:

NAME:

POSITION:

DATE: