

Navarre Minerals Limited Armstrong Community Code of Conduct

INTRODUCTION

This Code of Conduct has been developed collaboratively by Navarre Minerals Limited (Navarre) and community representatives and landholders in the Great Western – Armstrong region of central western Victoria.

Navarre is exploring for gold within its granted Exploration Licence 5476 straddling the Western Highway, centred on the location of Armstrong 10 km north of Ararat. Landholders coincident with Navarre's exploration area wish to have their common and varying lifestyles, land connections and livelihoods respected and protected. This Code is borne of that recognised desire based on mutual respect and obligation.

Navarre's exploration activities are at their highest level during the exploration 'field season', which typically runs from September to June, when weather conditions usually ensure that the ground conditions are dry and suitable for the movement of drill rigs and related equipment. The field season may be shortened by inclement weather, or may run for longer in good weather, and it may also be affected by other land use requirements for properties on which Navarre seeks to carry out exploration activities. It is acknowledged that Navarre's field season usually overlaps with the harvest season in the Armstrong area, and additional consultation and co-operation is likely to be required at such times when both harvest and exploration activities are undertaken simultaneously.

THE PURPOSE OF THE CODE

The Code is not intended to supplant or replicate the Victorian 2014 *Code of Practice for Mineral Exploration* (Victorian Code) established under the *Mineral Resources (Sustainable Development) Act 1990* (the **Act**); nor does it attempt to replicate Navarre's standard procedures covering technical and operational matters. Complementary to regulatory requirements and established procedures, the Code focuses on the behavioural values and specific community engagement measures that Navarre and its employees, contractors and visitors observe when working in the Great Western - Armstrong region.

Descriptions in this Code are intended for 'reasonable interpretation in good faith', leaving any legal argument and interpretation for the realm of the Victorian Code and other regulatory instruments. The Code is not intended to be legal in nature, definitive nor comprehensive; the subjects covered and specific commitments made are those that community representatives, landholders and Navarre have discussed and agreed to. The Code may be amended as necessary through discussion between community representatives, landholders and Navarre.

BEHAVIOURAL VALUES

Navarre is committed to work with all affected community members and landholders on the basis of timely, accessible information, and through ongoing, open and transparent engagement.

Navarre prefers to communicate by face-to-face discussion, however it recognises that it is frequently necessary to affirm and/or convey things in writing. Navarre will communicate directly with individual landholders, either in writing, via the phone or face-to-face and, where agreed by the individuals involved, Navarre will also inform and engage with groups of landholders collectively. Navarre will inform neighbours and other affected people ahead of time about Navarre's activities, giving those people an opportunity to request further information about the proposed program of works and to suggest ways Navarre could minimise impacts that affect them. From time to time Navarre may be constrained in providing timely information by reliance on other parties or legal requirements, however it makes every effort to get relevant information to landholders as soon as possible.

Above all, Navarre employees, contractors and visitors are expected to behave at all times with the utmost respect to the property, businesses and lifestyle values of community members and landholders in the areas where they are working or visiting.

COMMUNITY ENGAGEMENT PROCEDURES

The following descriptions refer to community engagement activities that Navarre observes in the Armstrong work area and elsewhere as requested by landholders. Standard operating procedures for specific activities are in place, or are being developed, and are available for landholder review on request.

Prior Notice of Exploration Programme

Consistent with early stage exploration, Navarre is not obliged to submit and seek consent for a 'Work Plan' as defined in the Victorian Code, however it makes available to *Affected Landholders* its proposed *Exploration Programme* two weeks ahead of the commencement of on-ground work. *Exploration Programmes* include descriptions of work to be undertaken, the type and number of vehicles, anticipated water use, likely noise levels and timeframes, and other information deemed useful and/or asked for by *Affected Landholders*.

Affected Landholders are those whose properties are subject to the proposed *Exploration Programme* and entry to their properties is required during the work ('primary landholders'), adjoining property owners and those who live further away in the community but who regularly use roads that experience Navarre vehicle traffic for the period of the exploration activity.

At a minimum, Navarre will provide information about any proposed Exploration Programme to *Affected Landholders* within a 1 kilometre radius of any drill hole site, but Navarre will always assess each individual site to determine whether, in the particular context, it is appropriate to extend that contact area. The level of contact (for example, a personal phone call versus a general letter) and the amount of detail provided to *Affected Landholders* will vary according to whether the landholder is a primary landholder, an adjoining property owner or a road user. However, all *Affected Landholders* are invited to contact Navarre and seek under discussion with Navarre reasonable variations to proposed exploration activities. Primary landholders may have agreed terms of access for particular exploration activities written into consent and compensation agreements (see "Land Access and Compensation" below).

Notice of Exploration Programme Status

Subject to ASX rules and other legal requirements, Navarre communicates to *Affected Landholders* the status and results of its exploration activities as soon as possible, and aims to distribute a local stakeholder update within 24 hours after any ASX release with significance to the Armstrong community.

Types and frequency of communication and consultation

Navarre's communication with landholders and the broader community varies according to circumstance and purpose, and includes:

- One-on-one discussions, emails and phone calls with individuals and groups of *Affected Landholders*.
- Presentations at stakeholder events, such as Great Western Futures Committee meetings.
- Specific stakeholder meetings organised by Navarre to present and discuss *Exploration Programme* status and proposals (convened by mutual agreement with *Affected Landholders'* request or otherwise bi-annually).
- Local stakeholder updates following ASX releases that are relevant to the Armstrong community.

- Quarterly Navarre Stakeholder Up-Date Notices, provided by mail drop or email to stakeholders who have provided addresses.
- Stakeholder updates posted on Navarre’s website.
- Local and regional media placements.

Navarre seeks to ensure landholder and community communication is formally referenced, respectful, accessible (‘plain English’ without technical jargon) and as complete as possible. While the form and tone of communication may vary according to context, Navarre will maintain consistency and integrity in content, including news relevant to Navarre’s activities in the region, changes to licence holding and conditions, and future exploration plans. Navarre provides *Affected Landholders* with user-friendly maps showing field activity locations with ‘snapshot’ narratives of proposed activities, named roads, prominent landscape features and (where property holders have agreed) identified properties. Navarre maintains a register that records community communication, consultation and other interactions. Affected Landholders may, on request and with reasonable notice, view the information contained in the register about them and their own interactions with Navarre.

Land Access and Compensation

Navarre secures land access consent and compensation agreements with all landholders to whose land it requires entry for its exploration activities, in all circumstances where the Act requires written consent and a record of agreed compensation. In circumstances where the Act only requires informed verbal consent (low-impact exploration), Navarre prefers to enter into land access consent and compensation agreement with the landholder, but will not insist if the landholder does wish to do so.

The agreements are private to each particular landholder and their contents will vary according to context, however Navarre seeks to ensure that they all conform to common principles and benchmarks, being:

- Landholders are reasonably compensated commensurate to the degree of disturbance to the land and their lifestyle and activities and any loss of income or amenity associated with Navarre’s activity.
- Landholders may prefer different ways for calculating compensation, either related to the tangible activity being undertaken (such as payment per drill hole) or the level and duration of disturbance (such as payment for each day on property).
- The quantum of payments to each landholder is not disclosed to other stakeholders, however Navarre aligns drill hole or daily unit payments to its own common thresholds.
- Agreements may include individually-negotiated dates and hours of activity.
- Specific health and safety provisions, including landholder access to Material Safety Data Sheets and Standard Operating Procedures, may be included in access agreements.
- Noise, dust, artificial lighting and water discharge conditions may be included.
- Post-activity rehabilitation expectations, inspections and penalty for non-performance provisions may be included.
- Landholders at their discretion may disclose, or not disclose, the compensation terms of their access agreements to other stakeholders, but Navarre does not.
- Navarre provides details about the scale, scope and timeline of exploration activity to all Affected Landholders, including a description of where it will take place. To respect the privacy of the host landholder, Navarre will not share their name or address with others, but will provide details about the location referencing public roads or other readily identifiable public landmarks.

- Navarre welcomes landholders' suggestions about which other affected community members and stakeholders to keep informed.
- Landholders may elect to discuss Navarre's proposed exploration activity and access routes with their immediate neighbours and may have reasonable time to complete this before signing an access agreement.
- Access agreements may be time or activity limited and renewed once their defined time periods or activities have been completed.
- Specific conditions for Landholder access agreements, where requested, may include, but are not limited to:
 - Description of machinery and equipment to be used.
 - How many personnel will be on the property and who they are.
 - Description of the area to be disturbed and how it will be restored.
 - What tracks and other resources on the property will be used and how often.
 - The anticipated number of drill holes and their expected depth.
 - Anticipated time on the property.
 - A noise/dust/light management and mitigation plan.
- Navarre's Complaints, Disputes and Grievance Procedure is appended to all access agreements to guide redress in the case of non-performance.

Field visits and demonstrations

Navarre hosts exploration open days each field season, and field visits and demonstrations of equipment for groups of landholders as requested at mutual convenience.

Navarre point of contact

Navarre nominates a single 'point of contact' for all landholder enquires, usually the field leader best placed to provide current and immediate information on request. Currently, the point of contact for landholder enquiries is Shane Mele, Exploration Manager, who can be contacted as follows:

By phone: 03 5358 8633

By email: shane@navarre.com.au

Calls or emails about urgent matters will be responded to as quickly as possible, and at the latest within 24 hours. Calls or emails about non-urgent matters will be responded to within 3 business days. When contacting the Exploration Manager, it is helpful if community members can clearly identify the question or issue they wish to discuss so that the matter can be appropriately referred within the Navarre team.

Navarre contractors and sub-contractors

Navarre expects that any contractor or sub-contractor doing work on behalf of Navarre in the Armstrong community will respect the principles outlined in this Code of Conduct. Navarre will provide this Code of Conduct to any contractors or sub-contractors conducting work on its behalf in the Armstrong community.

Community complaints, disputes and grievance

Navarre maintains a community complaints, disputes and grievance procedure that is accessible, easily understood and accountable, and which Navarre regards as valuable for community feedback and business improvement. The procedure is posted on Navarre's website and is provided to *Affected Landholders* during land access consent discussions. A description of the type and number of any complaints received and incidents reported is included in Navarre's Quarterly updates to stakeholders on a de-identified basis, and Navarre invites follow up discussion with those who are interested.

STANDARD OPERATING PROCEDURES (SOP)

Operational SOP relevant to this Code of Conduct are referenced below.

Community and Occupational Health and Safety (OHS) Management

In accordance with industry good practice, Navarre maintains OHS systems that seek to prevent health and safety exposures to employees, contractors, visitors and community members. All personnel and visitors, including community members and landholders, are required to comply with Navarre's OHS procedures, relevant to worksite and activity. Particular attention is paid to the movement and use of heavy equipment, such as drilling rigs. Navarre and contractor vehicle speed limits on non-bitumen roads in exploration areas is 40km/hr, or slower if conditions warrant. Dust and noise generation is monitored and kept at levels acceptable to EPA standards. All field personnel are trained in requisite OHS procedures. Pre-start OHS checklists and records are regularly reviewed for compliance by Navarre's field leaders and may be viewed by *Affected Landholders* on request.

Pest and Disease Control

Navarre strictly adheres to DEDJTR ([Viticulture biosecurity website](#)) pest and disease prevention and control procedures, managed through a SOP checklist and publicly available records. Biosecurity checklists are regularly reviewed for compliance by Navarre's field leaders and may be viewed by *Affected Landholders* on request.

Fire Prevention

Navarre strictly adheres to CFA fire prevention and control procedures ([Bushfire warnings and restrictions website](#)), managed through a SOP checklist and publicly available records. Drilling operations only occur in 'fire safe' periods after conferring with the local CFA, and drilling rigs carry certified fire extinguishers and more than 1,000 litres of water available for fire-fighting. All field crew are trained in fire prevention and extinguishment. Navarre employees, contractors and visitors are not permitted to smoke cigarettes or use 'naked flame' devices at exploration activity locations. Fire readiness checklists are regularly reviewed for compliance by Navarre's field leaders and may be viewed by *Affected Landholders* on request.

Water Use

Navarre stringently limits its water use with defined permission and compensation terms, drawing from public sources wherever possible and otherwise under formal contract. Navarre checks with the regional water authority to confirm the water quality and chemistry before drawing from any standpipe and records this as part of its drilling procedures. Any water used in connection with drilling is, at a minimum, equivalent to the quality of local groundwater. Navarre records the amount of water used so that it can pay for that usage on commercial terms.

There is no water discharge during drilling activity. During diamond drilling, water is used to cool and lubricate the diamond drill bits. Return water from the drill hole is strictly contained in above-ground tanks during drilling, along with the cuttings residue from the drilling. Those tanks are emptied periodically by an appropriately licensed contractor and the contents are removed by that contractor to an approved waste management facility.

REFERENCE DOCUMENTS

Mineral Resources (Sustainable Development) Act 1990 (MRSD Act.)

The Victorian Code of Practice for Mineral Exploration (2014)

NAVARRE SOP CHECKLISTS AND PROCEDURES (Available on Request)

Drilling Pre-start OHS Checklist and Record

Fire Prevention and Control Checklist and Record

Vehicle and Equipment Biosecurity Checklist and Record

Complaints, disputes and grievance procedure

Community interaction and exploration activity register