



Privacy Policy

1. Syrah's Commitment to Privacy

Syrah recognizes the importance of privacy and is committed to ensuring that all Personal Information collected or held by the Syrah Group is handled respectfully and in accordance with all relevant privacy laws.

2. Purpose

This Privacy Policy explains how the Syrah Group will collect, hold, use, disclose, protect and otherwise handle Personal Information in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth).

Syrah may modify or update its Privacy Policy from time to time by publishing it on the Syrah website (<http://www.syrahresources.com.au>) or the website of our subsidiaries (<https://www.twigg.co.mz/>). Syrah encourages individuals to check the Syrah website periodically to ensure that they are aware of Syrah's current Privacy Policy.

3. What Personal Information does Syrah collect and why?

3.1. Syrah collects the Personal Information it needs to provide its products and information to its customers and the community, for its business operations and to comply with the law. If an individual chooses not to provide certain Personal Information to Syrah, Syrah may not be able to do business with that person or their organization or provide them with the products or information they require.

3.2. If appropriate, Syrah will generally tell an individual why it is collecting Personal Information when Syrah collects the information and how Syrah plans to use the information, or these things will be obvious when the information is collected by Syrah.

3.3. The following are the main types of Personal Information collected by Syrah and the main purposes for which they are collected.

As part of Syrah's general business operations

3.4. Syrah collects Personal Information about individuals who are contracted to, or employed by, Syrah's suppliers (including third party service providers) and customers, and their related companies, agents and other representatives including for the purposes of supplier due diligence and know your customer verification. As required, this information may include an individual's name, contact details and other information necessary for Syrah to conduct business with that person or their organisation. Syrah may also collect Personal Information about individuals within the communities in which it operates, including a person's name and contact details, when necessary for conducting its operations in that locality.

Employees and contractors

3.5. Syrah collects Personal Information about individuals who are employed by or contracted to Syrah or its related companies. This information may include an



individual's name, contact details, qualifications and other information necessary to maintain an employment or contractual relationship with that individual. In certain circumstances this may include sensitive information, such as health information used for compliance with applicable workplace or equal opportunity laws.

To manage on-site operations

- 3.6. When individuals visit a Syrah site, Syrah records Personal Information about that individual which can include their address, phone number and (if applicable) licence details, for health and safety, and security purposes.

To assist with queries

- 3.7. An individual may provide Syrah with Personal Information including their name, email address or other contact details when he or she contacts Syrah by phone, email, post or using its website. This information enables Syrah to respond to these requests for information on matters such as corporate affairs, supplier information and investor relations. For example, when an individual makes an enquiry using the Syrah website, he or she may be asked to provide a name, email address and organisation he or she is associated with.

Shareholder information

- 3.8. Syrah collects Personal Information about its retail shareholders, and individuals who may be employed by or contracted to institutional shareholders. This information includes names, contact details and other information required for the purpose of establishing and maintaining the shareholder relationship.

To consider applications from prospective employees or contractors

- 3.9. When an individual applies for a job or contract with Syrah, Syrah may collect certain information such as his or her name and contact details, information about his or her working history, relevant record checks and information on his or her professional interests. This may be collected from the individual directly, from any recruitment consultant or other providers of recruitment services (including web-based services) and from the individual's previous employers and others, including referees and publicly available sources. This information is used to inform or assist Syrah in its decision on whether or not to make the individual an offer of employment or engage the individual under a contract. As necessary and where appropriate, Syrah may require prospective employees to undergo certain medical checks.

To comply with the law

- 3.10. Syrah may otherwise collect information about an individual as required or permitted by law.

4. How does Syrah collect Personal Information?

Syrah will generally collect information directly from the individual to whom it relates. However, Syrah may collect information about an individual from a third party, such



as a contracting company or via third party service providers (including Syrah's share registry service provider and Syrah's recruitment management service providers). Syrah may also receive third party Personal Information through its employees and contractors, including details of family members and next of kin. Syrah may supplement the information it collects with information from other sources, such as generally available publications and other information accessible on the internet.

5. Use of Personal Information

- 5.1. Syrah generally uses and discloses Personal Information for the purposes for which it was collected, as described above. This primarily involves carrying out Syrah business operations, including in connection with a person's recruitment or employment; managing supplier, customer and investor relations; for site safety and security purposes; or as otherwise required or authorised by law. Some of this information may include sensitive information, including health, racial or ethnic origin information, and will only be used for compliance with applicable laws and regulations including workplace and equal opportunity laws.
- 5.2. In fulfilling these purposes, Syrah discloses certain Personal Information to particular third-party service providers. This includes external organisations that manage Syrah's share register, recruitment information and employee information on behalf of Syrah.
- 5.3. Where appropriate, Syrah may handle Personal Information relying on exemptions that are available under applicable privacy laws, including, for example, the employee records exemption in the Privacy Act and provisions in the Privacy Act concerning the sharing of Personal Information among related bodies corporate.

6. Disclosure of Personal Information

For the purposes described in this policy, Syrah may disclose Personal Information:

- (a) Subject to any restrictions imposed by any relevant legislation, amongst the entities within the Syrah Group;
- (b) To Syrah's suppliers, service providers, professional advisers and agents. The types of service providers Syrah may disclose Personal Information to include:
 - i. Professional advisors such as lawyers, accountants and auditors;
 - ii. Providers of systems for recruitment management;
 - iii. Providers of Syrah share registry services;
 - iv. Consultants, contractors and agents, engaged by Syrah as part of its general business operations (e.g. logistics or storage operators, IT security specialists or sales agents);
 - v. Data storage providers.



- (c) To government agencies or regulatory bodies, where required;
- (d) To anyone to whom Syrah's assets or business (or any part of it) is transferred;
- (e) Where necessary to protect the rights or safety of any of its employees or a third party;
- (f) Where an individual to whom the Personal Information relates has consented to the disclosure; or
- (g) Where otherwise required or permitted by law. For example, Syrah may disclose information in response to a subpoena, warrant, or request from a government law enforcement agency, or as required under any laws or regulations applying to the mining industry in each of the regions in which Syrah operates.

7. Cross-border disclosures

7.1. The Syrah Group has operations and personnel located in several countries, including Mozambique, Australia, United Arab Emirates and the United States of America.

7.2. Syrah may disclose information to recipients that are located outside Australia, including in each of the regions in which it does business, but will do so in accordance with the requirements of this Privacy Policy and the Privacy Laws. Overseas disclosures include:

- (a) Disclosures within the Syrah Group as necessary to carry out the purposes for which the information was collected;
- (b) Where Syrah has made a business decision to store data with a trusted service provider who is in the business of providing data storage and processing services (e.g. cloud storage, offshore services, email and mobile application data service providers);
- (c) When our commercial relationship necessarily involves overseas disclosures (e.g. where we are supplying goods and services overseas); and
- (d) As otherwise required by the laws of the countries in which we do business.

7.3. Syrah requires that all overseas entities within the Syrah Group and the third parties it contracts with from time to time to take appropriate steps to protect the privacy and manage the security of Personal Information in accordance with Privacy Laws.

8. Cookies and IP address tracking

8.1. The Syrah website may use cookies for site administration purposes. If, for any reason, an individual chooses not to take advantage of cookies, the individual may have his or her browser not accept them (although this may disable or render unusable some of the features of the Syrah website).



- 8.2. Syrah's website may also detect and use an individual's IP address or domain name for internal traffic monitoring and capacity purposes or to otherwise administer the website. No Personal Information is obtained, rather the patterns of usage of visitors to the website may be tracked for the purposes of providing improved service and content based on aggregate or statistical review of user site traffic patterns.

9. **Links to other sites**

The Syrah website may contain links to other websites. Syrah is not responsible for the privacy practices or the content of such other websites. The privacy policies applicable to such other websites may differ substantially from this Privacy Policy, so Syrah advises individuals to read them before using those websites. Syrah will not be liable for any use of those websites.

10. **Security**

Syrah implements a number of physical and electronic measures to protect Personal Information. Syrah restricts access to its physical and electronic databases, maintain firewalls and encrypts certain data where practicable to do so. Please note, however, that the internet is not a secure environment and although all care is taken, Syrah cannot guarantee the security of information provided to it via electronic means.

11. **Access and correction**

- 11.1. An individual has a right to access and request correction to most Personal Information that Syrah has about that individual. In some circumstances it may not be possible or appropriate for Syrah to provide the individual with all of his or her Personal Information or an exemption under the Privacy Act may apply. For instance, the employee records exemption may be applicable, or Syrah may not provide access to information if disclosing that information would impact on the privacy of another individual.
- 11.2. Where Syrah will not provide access to Personal Information held about an individual, Syrah will provide reasons for this decision.
- 11.3. When an individual requests access to Personal Information, Syrah may need to take measures to verify the individual's identity before providing them with such information.
- 11.4. If an individual believes that any Personal Information Syrah holds about him or her is inaccurate, the individual may contact the **Syrah Privacy Officer** using the contact details below and Syrah will take reasonable steps to ensure that the information is corrected.

12. **Complaints about privacy or this Privacy Policy**

- 12.1. If an individual wishes to make a complaint about the way Syrah has handled his or her Personal Information (including if the individual thinks Syrah has breached the Privacy Act) the individual may do so by contacting the Syrah Privacy Officer in writing,



by mail or email to the address or email address set out at the end of this Privacy Policy.

- 12.2. If a complaint is made, a name and contact details such as an email, address and telephone number should be included as well as a description of the nature of the complaint. The Syrah Privacy Officer will investigate the complaint and respond promptly.
- 12.3. If the complainant considers that Syrah has failed to resolve the complaint satisfactorily, the complainant can refer the matter to the Office of the Australian Information Commissioner.

13. To contact Syrah's Privacy Officer:

For further information about Syrah's privacy policies or practices, or to provide Syrah with comments on this Privacy Policy, please contact the Syrah Privacy Officer by mail, email or phone on the contact details below:

Postal address: Privacy Officer
Syrah Resources Limited
Level 28
360 Collins Street
Melbourne VIC 3004

Email address: enquiries@syrahresources.com.au

Telephone number: +61 3 9670 7264

14. Publication, Review, Amendments and Inconsistency

- 14.1. This Privacy Policy will be made available on Syrah's website.
- 14.2. The Board is responsible for the review and approval of this Privacy Policy and approving any amendments to it.

15. Definitions

In this Policy, capitalised terms have the following meaning:

- (a) **Board** means the Board of Directors of Syrah;
- (b) **Corporation Act** means the Corporations Act 2001 (Cth);
- (c) **Personal Information** means information or an opinion about an identified individual, or about an individual who is reasonably identifiable;
- (d) **Related Bodies Corporate** means related bodies corporate as that term is defined in the Corporations Act;



- (e) **Syrah** means Syrah Resources Limited (ACN 125 242 284) and each of the entities in the Syrah Group;
- (f) **Syrah Group** means all Related Bodies Corporate of Syrah and includes, without limitation, Twigg Mining & Exploration Limitada, Syrah Resources & Trading DMCC, Syrah Global DMCC, Syrah Technologies LLC.

Document Number	Rev	Author	Approver	Date	Page
SYR-POL – Privacy Policy	0	Jennifer Currie	Board	29 November 2018	Page 6 of 6