ASX:TNC

Privacy Policy

Authorisation Details	
Date Created	12 November 2026
Document Number	TNC_CG_0012
Version Number	2.0
Policy/Procedure Holder	Board of Directors
Review Period	1 Year
Authorised by	Board of Directors
Date Authorised	12 November 2026

PURPOSE

True North Copper Pty Ltd ACN 652 408 378 (collectively TNC, we, us, or our) is committed to protecting your personal information.

In accordance with the Privacy Act 1988 (Cth) (Privacy Act) this Privacy Policy sets out how we manage your personal information.

This Privacy Policy is our "APP privacy policy" for the purposes of Australian Privacy Principle (APP) 1 in the Privacy Act. It applies to personal information we collect, hold, use and disclose, including through our website, and to our dealings with the public, visitors, community members, customers, suppliers, contractors and job applicants.

This Privacy Policy is not applicable to any third parties' websites or platforms that you may access from our website. We encourage you to obtain a copy of their privacy policies, to ensure that you are comfortable with how they handle and use your personal information.

WHAT IS PERSONAL INFORMATION?

"Personal information" is information or an opinion about you, or information from which you could reasonably be identified.

"Sensitive information" is a sub-set of personal information. We do not collect sensitive information without your consent, unless we are legally allowed to do so. By "sensitive information" we are referring to your racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, political, professional, trade association or trade union memberships, sexual orientation or practices, criminal records or your health, genetic or biometric information and templates.

COLLECTION OF PERSONAL INFORMATION

How do we collect your personal information?

We may collect your personal information:

- directly from you (for example, when we are in contact with each other, when you enter into contracts with us, when you attend events we arrange or sponsor, when you visit our website, facilities or premises and when you post about us on social media);

- *from publicly available sources and databases* (for example, if it is unreasonable or impractical for us to collect the personal information directly from you, because we have provided you with a fair opportunity to supply personal information which we reasonably require for our activities, but you have only partially provided it, or not provided it at all);
- *through statutory, regulatory and other governmental processes*; and
- *from third parties* who you have authorised to provide us with your personal information.
- If we receive unsolicited personal information about you, we will assess whether we would have been entitled to collect it. If we would not have been entitled to collect it, we will destroy or de-identify it as soon as practicable (if it is lawful and reasonable to do so).

What kinds of personal information do we collect?

Depending on how you interact with us, we may collect personal information which includes, but is not limited to:

- Contact and identity details – if we are in contact with each other, we may collect details which include your full name, date of birth, gender, street address, postal address, email address and telephone number.
- Prospective employee or prospective supplier details – if you submit an application to become our employee or to become our supplier, we may collect your contact details, demographics (including your vocation and educational history), personal interests and a history of our interactions or dealings with you.
- Feedback requests and survey preferences - we may collect details about your philosophical beliefs, associations or memberships and your feedback on our activities, products and services, including when you interact with us on social media platforms.
- Visitor information, images and videos - if you visit our processing facilities, premises or events, we may collect your credit card details when you make bookings with us and your health information (such as dietary requirements, allergies, health conditions, drug and alcohol test results) when you attend our sites or events. From time-to-time we will collect photographs and video footage of our visitors.
- Website interactions – if you communicate with us or purchase products or services from our website we may collect your contact details, credit card details, screenshots and other information you choose to provide. Payment details provided through our website are processed through a secure server.
- Technical and device information – when you use our website we may collect your IP address, device and browser identifiers, cookie data and information about how you use our website.
- Customer sales information – when you purchase goods or services from us, whether in person or through our website, we may collect your contact details, demographics and credit card details.
- Community group details – if you are part of a community group with whom we are consulting we may collect your contact details and other information you choose to provide.
- *Acquisition of other businesses* – if we acquire the assets of another business to whom you have disclosed your personal information, such transactions generally involve the disclosure of personal information from the seller, either as part of the due diligence process or as a result of the assets being transferred to us. In such instances, TNC collects the personal information which was held by that business.

Do we use cookies or other analytics tools on our website?

Our website uses 'cookies' to improve your browser experience. Cookies are small text files that are downloaded and stored onto your computer's browser directory when you visit our website.

Cookies are used to track the pages and services you visit on our website and to ensure that you are able to move freely across our website, without needing to re-enter information that you have already provided. Cookies are also used to recognise you when you return to our website and to enhance the performance of our website, by collecting information that helps us understand how our website is being used and to make improvements to its functionality.

We use cookies to collect information such as:

- your computer's IP address and other technical information;

Matters which should be reported under this Policy may include:

- Dishonest, fraudulent, corrupt or unlawful conduct or practices. This includes but is not restricted to accounting and financial reporting practices, as well as those related to commercial and contractual arrangements with other parties.
- A breach of the Company's Code of Conduct, policies or the law.
- Conduct that may cause financial or non-financial loss to the Company or damage the Company's reputation.
- Conduct endangering the environment or the health and safety of any person which has been reported to management but not acted upon.
- date and time at which you access our website and the duration of your visit;
- the pages and content that you viewed during your visit; and
- the type of browser you are using.

You can refuse or disable cookies by adjusting your Internet browser's setting. However, our website may not function correctly if you do so.

Similarly, we use identifiers for mobile devices (e.g. Android Advertising Identifier or Advertising Identifier for iOS) and website analytics tools such as *Google Analytics* to analyse the use of our website, so that we can improve how we interact and engage with you.

For further information on how Google Analytics collects and processes data, please see Google's website for further information. For example, see "How Google uses information from sites or apps that use our services" at: https://policies.google.com/technologies/partner-sites?hl=en=US

USE OF PERSONAL INFORMATION

How do we use your personal information?

We may use your personal information:

- to provide our products and administer our services, including providing customer support, verifying your identity, undertaking drug and alcohol testing when you visit our premises or facilities, fulfilling orders, managing payments and accounts, training our staff and testing our systems;
- to acquire services from you;
- to administer, or facilitate the administration of, medical assistance if a health and safety incident occurs;
- to assess your suitability to be employed by us, or to supply goods or services to us;
- to develop, inform you about and deliver our events;
- to distribute our newsletters and other communications, including emails;
- to publicise our events and facilities, including by publishing images of you attending our events and facilities;
- to conduct marketing activities for our products and services;
- to conduct research and analysis directed at improving our products, services and websites;
- to understand your preferences and behaviours;
- to plan our resources and manage our workforce;
- to conduct quality audits and for risk management generally;

- to conduct our corporate social responsibility activities;
- to administer our leases, licences and clearance procedures;
- to negotiate, manage and fulfil our contracts with customers, suppliers and third parties; and
- to comply with our legal obligations.

Do we use automated decision-making or artificial intelligence?

From time to time we may use computer programs, including software that incorporates artificial intelligence, to assist with our business operations. From 10 December 2026, where we arrange for a computer program to make a decision, or to do something substantially and directly related to making a decision, that could reasonably be expected to significantly affect your rights or interests, and personal information about you is used in its operation, we will disclose in this Privacy Policy: (a) the kinds of personal information used; (b) the kinds of such decisions made solely by a computer program; and (c) the kinds of such decisions for which a computer program does a thing substantially and directly related to making the decision. TNC does not currently use any computer program to assist with its business operations that may affect your rights and interests. We do not use personal information to train publicly available generative AI tools without your consent.

Do we use your personal information to conduct direct marketing?

We may send you information about our products and services that we consider might be of interest to you. These communications are sent in various forms, including SMS and email. You can opt-out of receiving marketing communications at any time by lodging a request with our Privacy Officer (whose details appear below) or by using the opt-out method provided in our marketing communications. Once we have received your opt-out request, we will remove you from our direct marketing programs as soon as reasonably practicable. We do not trade in or sell your personal information to other parties.

Our marketing communications comply with the *Spam Act 2001* (Cth) and, where applicable, the *Do Not Call Register Act 2006* (Cth). We will only send you electronic marketing messages with your consent (express or inferred) and each message will identify us and include a functional unsubscribe facility.

DISCLOSURE OF PERSONAL INFORMATION

We disclose personal information in limited circumstances. Your personal information may be disclosed to:

- our third party service providers, including event co-ordinators, payment processors, data entry providers, marketing agencies, IT service providers, mailing houses, electronic network administrators, cloud service and software providers, debt collectors, suppliers, medical personnel and where necessary, to professional advisers, such as our financiers, solicitors and accountants;
- other members/entities within our corporate group;
- government authorities or other statutory bodies where it is expressly permitted under the Privacy Act. For example, where you have provided your consent or we are legally required to do so, such as under a court order or warrant;
- prospective purchasers of our assets or business, in the event that our assets or business are offered for sale or merger with any third party; and
- any other parties to whom you have authorised us to disclose your personal information.

Do we disclose your personal information overseas?

Due to the global nature of our operations and business, your personal information may be disclosed to personnel situated outside of TNC. We may use overseas parties to collect, transfer, store and handle your personal information and personal information may be stored in the Cloud (that is, computer servers connected to one another via the Internet).

For example, we may store your personal information with, or allow it to be accessed by, overseas parties who provide:

- software and maintenance services for the Cloud;
- training services in connection with using and accessing the Cloud; and
- infrastructure/hardware used to access the Cloud.

Before disclosing your personal information to an overseas recipient, we will take reasonable steps in the circumstances to ensure that the recipient does not breach the *Australian Privacy Principles* (other than APP 1) in relation to that information, unless an exception under APP 8 applies (for example, where you have given informed consent after we have told you that APP 8.1 will not apply, or where the disclosure is required or authorised by law). Where practicable, the countries in which overseas recipients are likely to be located include: United States, Canada, New Zealand, Singapore and the European Union.

STORAGE AND SECURITY OF PERSONAL INFORMATION

How do we store and secure your personal information?

We take reasonable steps to protect your personal information, including maintaining electronic, physical and procedural security measures to safeguard it.

For example, we have in place usernames, passwords and access restrictions to protect personal information that we store electronically. However, there are inherent risks with the transmission of data over the internet. Whilst reasonable security measures are in place for the protection of your personal information, please be aware that no guarantee can be made that your personal information is completely secure.

We also secure hard copy personal information within buildings or other storage facilities, by restricting access to those buildings or facilities (for example, by locking the buildings in which the personal information is stored).

If any unauthorised access or disclosure of your personal information occurs, we comply with our obligations under the *Privacy Act* in dealing with that unauthorised access or disclosure, including any obligations under the Notifiable Data Breaches scheme in Part IIIC of the *Privacy Act*.

We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure, using appropriate technical and organisational measures (for example, access controls, encryption, staff training and supplier due diligence). We retain personal information only for as long as it is needed for the purposes described in this Privacy Policy or as required by law, and when it is no longer needed we will take reasonable steps to destroy or de-identify it.

ACCESS TO, AND CORRECTION OF, PERSONAL INFORMATION

How can you access and correct your personal information?

You may request access to your personal information by sending a written request to our Privacy Officer (whose details appear below). Upon receiving an access request, we may seek further details from you in order to verify your identity. We reserve the right to refuse access to personal information if we cannot verify your identity to our reasonable satisfaction. Access will generally be provided in an appropriate format within 30 days. We may charge a fee for providing access if it requires a significant amount of time to locate your personal information or to collate or present it in an appropriate format. This fee will be explained to you before it has been incurred.

In limited circumstances, and only where it is permitted under the *Privacy Act*, we may not be able to provide access to your personal information: for example, where it would have an unreasonable impact upon the privacy of others or where we believe your request is frivolous or vexatious.

If we refuse a request to access or correct your personal information, we will give you written reasons and information about how to complain, in accordance with APP 12 and APP 13.

We will take reasonable steps to ensure personal information we collect and use is accurate, up-to-date and complete. Where personal information is out-of-date or incorrect, please let us know by contacting our Privacy Officer and we will correct it.

MISCELLANEOUS ISSUES

Can you deal with us anonymously or use a pseudonym?

You can choose to deal with us anonymously or by using a pseudonym. However, we may be unable to provide you with accurate or useful information, and (in some circumstances) you may not be able to access a full range of our products and services. For example, we may not be able to process your request, we may need to ask you further questions or require more time to respond.

Will our Privacy Policy change?

We may amend this Privacy Policy from time to time in order to ensure that it reflects any alterations to our information handling practices or business circumstances. Any updated Privacy Policy will be published on our website. Changes come into effect from the time when they are brought to your attention, or when you next logon to our website, whichever is earlier. Please make sure you review this Privacy Policy each time you visit our website to keep up to date on any changes.

How can you contact us regarding privacy matters?

If you have any concerns or complaints regarding how we handle personal information, please contact our Privacy Officer. Correspondence should be addressed to:

Privacy Officer

True North Copper Pty Ltd

Address: PO Box 3006, Cairns City, Queensland, 4870 E-mail: contact@truenorthcopper.com.au

We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious.

If a privacy concern or complaint is not resolved to your satisfaction, you can contact the Office of the Australian Information Commissioner.

The Office of the Australian Information Commissioner can be contacted on 1300 363 992 or via www.oaic.gov.au. You may also have other rights under the Privacy Act, including the right to seek compensation for an interference with your privacy and, in some circumstances, to bring an action for a serious invasion of privacy.

Last updated: 12 November 2026