Our management approach to ethics, conduct and integrity

Gold Fields is committed to operating within the ambit of the law and portraying good corporate citizenship and integrity in how we conduct our business.

Gold Fields maintains a Group-wide Compliance Framework (the **Framework**). The Framework focuses on two key themes to manage an array of potential, perceived or actual risk exposure areas: the first being centred on professional business conduct and ensuring integrity in how we operate; and the second ensuring the Group complies with all identified and applicable obligations imposed by laws, regulations, and adopted rules, codes, and standards the Group subscribe to, being applicable in the jurisdiction where the Group has a presence.

The primary control for ensuring Gold Fields has a business culture of integrity is the Group Code of Conduct. This critical document enables internal and external stakeholders to gauge behaviour and integrity, by setting out the primary commitments and expectations of Gold Fields. The Code applies to all directors, employees (all categories) and stakeholders, and the nature and extent of the design is to cover all business and operational activities in the Group's end-to-end value chain. A review of the Code was conducted in 2024 to align with Gold Fields' new operating model, and a further detailed review of the Code is being undertaken during 2025 with the intent to implement a refreshed Code of Conduct in 2026.

The Code is approved by the Board and its members, members of the Executive Committee and Company employees. They have signed an acceptance declaration to commit to embedding the intent, principles, and requirements of the Code in everyday business, and how we engage with all our stakeholders, internally and externally.

Our main stakeholders in ethics, conduct and integrity are:

- Our **employees,** who are subject to the provisions of our Code of Conduct and are expected to conduct business ethically, comply with applicable regulatory and other requirements
- Our **business partners (suppliers and contractors),** who are expected to support our purpose and vision, share and uphold our values and the standards set in our Code of Conduct, and comply with all applicable laws, regulations, rules, codes and standards
- **Governments,** who expect compliance with all relevant legislation and regulations

We engage with these stakeholders through regular consultations, collaborative initiatives and transparent reporting to ensure we cultivate a culture of integrity and build trust.

OUR COMMITMENTS TO ETHICS, CONDUCT AND INTEGRITY

The main policies supporting our approach to ethics, conduct and integrity include our:

- Board Charter
- Code of Conduct
- Supplier Code of Business Conduct
- Board Diversity Policy
- Anti-bribery and Corruption Policy
- Group Whistleblowing Policy
- Group Disciplinary and Governance Policy
- Material and Supply Chain Stewardship Policy

As a member of the International Council on Mining and Metals (ICMM), we implement and publicly report and assure our performance against its Mining Principles and Performance Expectations, particularly Principle 1 – Ethical business. We are also aligned with the United Nations Global Compact and the Voluntary Principles on Human Rights and support the principles and processes of the Extractive Industry Transparency Initiative.

As a member of the World Gold Council (WGC), we implement and publicly report and assure our performance against its Responsible Gold Mining Principles (RGMPs), particularly Principle 1 – Ethical conduct. In May 2025 we published our inaugural WGC RGMPs conformance self-assessment report, which was assured. The self-assessment report and assurance statement can be accessed at the following link: Responsible Gold Mining Principles Conformance Report.

We comply with the JSE Listings Requirements and NYSE Listings Requirements, as well as the required provisions of the US Securities and Exchange Commission and the terms of the Sarbanes-Oxley Act of 2002. We further bolster our governance approach by aligning our processes, practices and structures with the King IV Report on Corporate Governance, 2016 (King IV).

OUR ETHICS, CONDUCT AND INTEGRITY IMPACT

If not well managed, non-compliance to the Code, and related and aligned Policies, can have far-reaching effects, and can theoretically manifest in an array of related risks. The most important ones being regulatory, reputation, and association risk from a business perspective. From an employee perspective, an individual may be subject to disciplinary action, and reputation risk, which could manifest in condemnation risk.

OUR ETHICS, CONDUCT AND INTEGRITY MANAGEMENT ACTIONS

Gold Fields maintains a Group Compliance Portal to systemically record, analyse, and report on the level of compliance, and adherence to the Code, in the Group. The Portal has a Code of Conduct Gateway to act as a centre of excellence for employees to further contextualise the Code and its application.

A cross-jurisdictional Group Policy Register is maintained for the Group and all Regions in the Group, to facilitate alignment between policy levels and ensuring Group policy principles and application prevail. This register is published and maintained on the Group Compliance Governance Portal. During 2025, a new Group Document Governance Standard was published, and a program for renewing all policies and subsidiary documents and consolidating onto a new Group Document Management System (DMS) is underway.

An interactive Third-Party Due Diligence Gateway enabling the Procurement teams across countries to ensure any potential risk of procuring products and services from a vendor is diligently accessed, and if same cannot be mitigated, not to enter a business relationship with the vendor.

Data from the Portal is reviewed and analysed on a quarterly basis as part of our Group reporting, which allows management and other internal stakeholders to unpack identified trends and enhance the interpretation and application value.

Although the requirements of the Code and the ABC Policy are made applicable to contractors and suppliers, given the nature, extent and location, formal training sessions are not conducted. They are, however, furnished with a copy of the Code of Conduct, and are required to sign the Group's Supplier Code of Conduct Certification and via the normal contractual management cycle, contract managers ensure awareness of the Code, as it is a contractual requirement to adhere to the values and principles of the Code is included in all the agreements with third parties.

Conduct and Ethical Behaviour Awareness and Attestation Across the Group

Employees are required to complete an eLearning training programme on the Code of Conduct, which is strongly focussed on ethical decision making. In addition, high-risk exposure portfolios, i.e., finance, procurement,

stakeholder engagement, etc. have received more in-depth training, with a specific focus on anti-bribery and corruption, as a defined element of the Code. Gold Fields Board of Directors have participated in anti-bribery and corruption training within the last 12 months.

It is intended that more training will be provided to those groups following update of the ABC Policy in 2025. However, at there remains as part of the eLearning programme a defined focus on corruption and bribery.

Gold Fields has also implemented a Group Whistleblowing Policy. That Policy is under review in 2025 with improvements to the platform and procedure intended to be implemented during 2026.

Gold Fields has specific procedures in place to deal with any actual or potential corruption incident:

- International and local external legal counsel are consulted for sound boarding and guidance purposes, where required
- In-country legal teams are the first port of call for advice in respect of any bribery or corruption incidents and may be involved where there are significant breaches of the Code of Conduct (including as escalated via the People team). Significant matters are escalated to the Executive Vice-President: Legal and Governance. Note that a defined escalation and approval framework forms part of the Code
- Internal and external issues, depending on their severity, can also be escalated through the management structures, as defined in the Code. In addition, concerns about unethical and/or unlawful behaviour by external stakeholders may be raised through interactions between them and our operational procurement and contract management teams
- Data analysis is conducted quarterly as part of our Group reporting to determine trends and enhance the interpretation and application value of the Code. The Code of Conduct and all the subsidiary processes are subject to review and improvement during 2025.

HOW WE MEASURE OUR PERFORMANCE

Our Legal and Governance team are committed to enhancing the Framework, and therefore continuously review it for improvements. A comprehensive review of the Compliance Framework is being undertaken in 2025, to ensure that it is fit for purpose and best practice.

WHERE WE REPORT ON OUR PERFORMANCE

The Code of Conduct and Group Whistleblower Policy provides a process for the reporting of concerns about unethical, inappropriate, or unlawful behaviour, and organisational integrity. The primary channels are an externally provided “tip-off” line and escalation to management in line with the Group Whistleblowing Policy.

The current tip-off line is available to both internal and external stakeholders and is independently operated and managed by an external entity. Confidentiality is guaranteed and the investigation process are recorded and approved by the Audit Committee. In addition, stakeholders are constantly reminded via awareness mechanism that any concern can be recorded anonymously.

Disciplinary case outcomes are indexed in line with themes in the Code. The intent is to enhance the nature and extent of awareness regarding the application of the Code, as well as to consistently review the Code for updates.

The reporting of trends is included in the quarterly Compliance Report submitted the Audit Committee, and other defined sub-committees.

Reporting and disclosures on our approach and performance to ethics, conduct and integrity are shared in our:

- Integrated Annual Report
- Report to Stakeholders
- Governance and Remuneration Report