
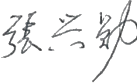
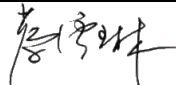




	POLICY		1013-PL-27-024	
	Human Rights Policy		REVISION NR	000
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HUMAN RIGHTS POLICY

TARGET AUDIENCE	
The target audience for this Human Rights Policy is Kamo Copper SA (hereinafter the "Company") employees, including directors, officers, and authorized spokespersons, as well as all consultants, contractors, advisors, and other persons involved in business with the Company i.e., all persons working for or with the Company defined as "Covered Persons".	
PURPOSE OF THE POLICY	
The purpose of this Policy is to describe Kamo Copper commitment to respecting human rights and the conduct expected from all Covered Persons to realize this commitment. The Policy is designed to ensure proper understanding and effective use, and integration of the Company's human rights related management systems within the context of parent companies' policies, international standards and Kamo Copper SA culture of responsible and corporate citizenship.	
APPROVAL	
POLICY NAME	Human Rights Policy
POLICY NUMBER	1013-PL-27-024
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DATE	12/11/2024
SIGN OFF	
Position: Policy Committee Member, Managing Director Name: Riaan Vermeulen	
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PROPRIETARY INFORMATION	
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DOCUMENT CHANGE HISTORY

Revision number	Date of Change	Reason for Change	Paragraph Number (if relevant)
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	POLICY	1013-PL-27-024	
	Human Rights Policy	REVISION NR	000
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TABLE OF CONTENTS

- 1. Purpose3
- 2. Scope3
- 3. Definitions and Abbreviations.....3
- 4. Policy Statement3
- 5. Commitment to International Standards4
- 6. Specific Requirements5
 - 6.1. Corporate policies.....5
 - 6.2. Operation processes and plans.....5
- 7. Human Rights Management Framework5
 - 7.1. Identification of human rights risks5
 - 7.2. Integrating human rights risk management5
 - 7.3. Tracking human rights risk management6
 - 7.4. Communicating performance6
- 8. Provision of remedy for adverse human rights impacts6
- 9. Priority Human Rights Themes6
- 10. Exception to Policy.....8
- 11. Policy Review.....8

	POLICY		1013-PL-27-024	
	Human Rights Policy		REVISION NR	000
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1. Purpose

The purpose of this Policy is to describe Kamoia commitment to respecting human rights and the conduct expected from all Covered Persons toward reaching this commitment. The Policy is designed to ensure proper understanding and effective use and integration of Kamoia Copper SA's human rights-related management systems within the context of parent companies' policies, international standards and Kamoia Copper SA culture of responsible and corporate citizenship.

2. Scope

The Policy applies to all employees of the Company, including directors, officers, and authorized spokespersons, as well as all consultants, contractors, advisors, and generally all individuals involved in business with the Company i.e., individuals and entities working for or with the Company.

3. Definitions and Abbreviations

The definitions and abbreviations applicable to this Procedure are detailed in Table 3-1

Table 3-1: Definitions and abbreviations applicable to Policy

Term	Definition
Company	Kamoia Copper SA, Kamoia
ICoCA	The International Code of Conduct for Private Security Service Providers
Human rights	Wide continuum of values or capabilities thought to enhance human agency or protect human interests and declared to be universal in character, equally claimed for all human beings, present and future including right to life, physical safety, own and enjoy property, right of association, fair treatment in workplace.
IFC	International Finance Corporation
ILO	International Labor Organization
OECD	Organisation for Economic Co-operation and Development
UN	United Nations
UNGP	United Nations Guiding Principles on Business and Human Rights
VPSHR	Voluntary Principles on Security and Human Rights

4. Policy Statement

Kamoia Copper is committed to respecting human rights in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs). The Company specifically recognises the equality and dignity of all people and commit to upholding the corresponding obligation of non-discrimination.

The responsibility to respect human rights is a fundamental operating principle embedded in Kamoia Copper's ethos. In committing to the UNGPs, the Company acknowledges its responsibility to avoid infringing on the rights and

	POLICY		1013-PL-27-024	
	Human Rights Policy		REVISION NR	000
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freedoms of all individuals, whether directly through its activities, products, and services, or indirectly through business relationships. In the Company’s commitment to upholding the UNGPs, Kamoia recognises its responsibility to address adverse impacts on people, which it has caused or has contributed to. The scope of Kamoia responsibility encompasses not only the Company’s employees and communities impacted by its operations but extends to the stakeholders affected by the relationships and activities in the Company’s value chain.

The UNGPs specifically requires that Kamoia “knows and shows” that it respects human rights, and that it does so through the implementation of ongoing human rights due diligence. Kamoia acknowledges that the risk of being linked to human rights impacts is particularly high in certain contexts, which may include the environments where it operates and the business activities the Company conducts whose heightened risk requires proportionate levels of human rights due diligence.

To ensure implementation of the Company’s commitment to respect human rights, Kamoia Copper establishes robust procedures aligned with the UNGPs to identify adverse actual and potential human rights impacts, integrate measures to manage these impacts, track and communicate implementation of these management measures, while working to remedy any adverse human rights impacts the Company may cause or contribute to.

5. Commitment to International Standards

Through a commitment to the United Nations Guiding Principles on Business and Human Rights, Kamoia Copper aims to ensure that these principles are integrated throughout the Company policies and processes designed to identify, assess and mitigate human rights risks across operations and value chain. Through ongoing monitoring, reporting, and transparent dialogue with stakeholders, the Company commits to ensuring a responsible and ethical business environment and seek partnerships with entities that share this commitment.

Beyond the UNGPs, the Company’s commitments encompass a wide range of internationally recognised human rights as defined in the International Bill of Human Rights – which includes the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; and the International Covenant on Social and Cultural Rights.

Depending on the context, the Company also rely on other international human rights instruments, standards and tools including the Convention on the Rights of Persons with Disabilities, and the UN Global Compact.

The Company specifically commit to the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO Declaration) which includes a commitment to freedom of association and the effective recognition of the right to collective bargaining.

Also included in the ILO Declaration is a commitment to ensuring that the Company maintains a safe and healthy working environment free from discrimination and harassment. Further, Kamoia Copper will not tolerate, and endeavours to identify and eliminate from its supply chain, instances of child labour, any form of forced, compulsory or bonded labour, human trafficking or any other form of slavery.

As a subsidiary to publicly listed companies, Kamoia Copper is also committed to comply with its parent companies’ human rights obligations and maintains a zero-tolerance approach to forced labour and child labour regardless of with whom or where the Company works. Kamoia is committed to complying with all relevant laws concerning forced labour and child labour and to preventing forced labour and child labour throughout its network of suppliers. Diversity is entrenched in Kamoia’s organisational culture, which seeks to maintain an inclusive working environment and encourages respect and tolerance of differences.

In line with the Voluntary Principles on Security and Human Rights or VPSHR, the Company is committed to ensuring that private and public security providers’ activities linked to Kamoia Copper are aligned with international best practice, including the responsible and proportionate use of force. Through the implementation of proper policy and accompanying capacitation, Kamoia Copper strives to ensure that its security providers understand and meet their responsibility to respect human rights in the context of security provision.

Kamoia Copper recognises the importance of the IFC Performance Standards, which have strongly influenced the

	POLICY		1013-PL-27-024	
	Human Rights Policy		REVISION NR	000
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Company's guidelines and procedures in social and environmental performance related to human rights, including ensuring a safe and healthy working environment; respecting the legal and customary rights of landowners; and recognising the need to avoid or mitigate resettlement where reasonably possible, and providing fair and just compensation where not.

6. Specific Requirements

6.1. Corporate policies

Kamoa Copper has established a range of corporate policies to support adherence with this Human Rights Policy covering all activities and functions across business operations including the Code of Business Conduct and Ethics, Health and Safety Policy, Environmental Policy, Non-Discrimination and Anti-Harassment Policy, Employees Privacy Policy, Anti-Bribery and Corruption Policy, Social Corporate Responsibility Policy and others

6.2. Operation processes and plans

Kamoa Copper commits to developing and implements processes and plans to support the Company's commitment to human rights. Specific processes and plans are developed and implemented to respond to human rights risks related to labour, environmental and social impacts; stakeholder engagement grievance management; security; risk; procurement; human resources; and health and safety.

To ensure compliance with policies, a series of monitoring, evaluation and reporting procedures are implemented at operations level designed to ensure effective implementation of the Human Rights Policy ultimately fostering a culture of accountability and responsibility toward human rights.

The Company is committed to implementing the Global Industry Standard on Tailings Management by ensuring comprehensive tailings management practices which focus on affected people in order to respect human rights. According to that standard, a due diligence process is required to identify and address those people most at risk from a tailing facility or its potential failure.

Kamoa Copper strives to align to ISO 14001, ISO 45001 and ISO 9001, which respectively provide comprehensive frameworks for environmental, occupational health and safety management and quality assurance.

7. Human Rights Management Framework

7.1. Identification of human rights risks

All personnel should be equipped with the necessary information and awareness to identify and address adverse human rights impacts associated with their work. Kamoa Copper operations ensure the presence of relevant competent personnel to uphold this standard. An independent human rights risk assessment (HRIA) is undertaken at least every five years, followed by the development of actively maintained annual human rights action plans. These plans are monitored and evaluated, and any material change in the social context will trigger increased frequency of HRIAs. Kamoa Copper consults with impacted and potentially impacted people, and has resources to monitor, manage and mitigate human rights risks. Resource allocation should be based on the risk assessments to adequately address salient human rights risks.

7.2. Integrating human rights risk management

The Sustainability Team oversees the adoption and implementation of this Policy. Human rights planning is an ongoing process which involves collating human rights data, knowledge, and management plans and should always involve the input of affected stakeholders where reasonably possible. Kamoa Copper will work to integrate findings

	POLICY		1013-PL-27-024	
	Human Rights Policy		REVISION NR	000
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from impact assessments across relevant Company processes, and such findings should inform impact management actions.

7.3. Tracking human rights risk management

Kamoa Copper endeavours to develop human rights targets and indicators that support the parent companies' targets and involve affected stakeholders in the monitoring and evaluation of impact management. Kamoa Copper aims at providing monthly check-in reports and consolidated annual reports. Kamoa Copper wider human rights performance will be communicated through sustainability reporting.

7.4. Communicating performance

The Company will public report on the material adverse human identified rights impacts, how it plans to manage such impacts, and performance in this regard through Group's annual sustainability reporting. The Company will also ensure ongoing engagement and reporting to stakeholders who are or may be adversely impacted by the Company's activities or business relations.

8. Provision of remedy for adverse human rights impacts

Access to effective remedy is a core component of the UNGPs. Kamoa Copper commits to providing access to remedy by maintaining functioning, accessible, and effective grievance mechanisms that enable stakeholders, particularly affected rightsholders, to raise concerns regarding the impacts arising from the Company's activities and business relationships. Where the Company determine that it has caused or contributed to an adverse human rights impact, it will provide for, or cooperate in, processes to enable appropriate remediation. Kamoa may also play a role in the remediating process for harms that are directly linked to its products, services, or relationships.

9. Priority Human Rights Themes

Table 9-1: Key human rights themes

Human Rights Themes	Approach
Labour Conditions	<p>Kamoa Copper takes steps to operate in a manner consistent with the terms of the ILO Declaration on Fundamental Principles and Rights at Work, including the four Core Labour Standards the subject of the ILO Conventions upon which the Declaration is based, related to:</p> <ul style="list-style-type: none"> • Freedom of association and the effective recognition of the right to collective bargaining. • The elimination of all forms of forced or compulsory labour. • The effective abolition of child labour; and • The elimination of discrimination in respect of employment and occupation. <p>Under the Company's Code of Business Conduct and Ethics and applicable policies, the Company does not tolerate harassment or bullying of any kind, or discrimination based on personal attributes unrelated to job performance, such as race, ethnicity, gender identity, sexual orientation, intersex status, physical or mental disability, mental illness, religion, political opinion, pregnancy, breastfeeding or family responsibilities</p>
Host Communities	<p>There are many human rights potentially relevant to the communities where Kamoa operates, including economic, social and cultural rights, such as health and wellbeing,</p>

	POLICY		1013-PL-27-024	
	Human Rights Policy		REVISION NR	000
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	<p>work, adequate housing and water and sanitation. The Company aims to take a rights-based approach to the way it partners with the communities where it operates, including how it addresses resettlement, engage with stakeholders, assess potential impacts, implement complaints and grievance mechanisms, and make social investment.</p>
Women Rights	<p>Kamoa Copper is committed to respecting women human rights and to encouraging the recruitment, development, advancement and retention of women in workplace. The Company has in place corporate policy requirements and plans programs that seek to prevent sexual harassment and gender-based violence focusing on awareness and training as well as appropriate grievance and remediating mechanisms.</p> <p>The programs extend to affected communities where the Company seeks to create favourable balance benefiting girls and women through social investment in education, literacy, health and income generating opportunities.</p>
Healthy Environment	<p>The nature of Kamoa Copper operations can have significant environmental impacts with devastating impacts on human life. The Company recognises the global environmental challenges of climate change, biodiversity, pollution and waste that can exacerbate adverse environmental impacts and further affect human rights. The Company's Environmental Policy and related procedures outline the approach Kamoa Copper has to minimise adverse environmental impacts through the entire lifecycle of operations recognising that humans depend on the environment while acknowledging the right to a clean, healthy and sustainable environment as a human right.</p>
Security Providers	<p>The Company's Security and Risk Control Policy sets out the standards by which we operate to comply with the Voluntary Principles on Security and Human Rights (VPSHR) requiring that contract private security providers and supporting public security providers confirm their commitment to the VPSHR.</p>
Tailings Storage Facilities	<p>The Company undertakes to implement the Global Industry Standard on Tailings Management by ensuring comprehensive tailings management practices centred on operations affected people through appropriate due diligence processes that identify and address people most at risk from a tailings facility or its potential collapse.</p>
Supply Chain	<p>The Company's Supply Chain policies and procedures apply supplier prequalification, contracting and ongoing monitoring requirements to manage supplier risks including in relation to human rights and global minimum requirements for suppliers. Risk-based supply chain due diligence for goods and services in the Company's inbound supply chain targets modern slavery practices and other key human rights risks including child and forced labour, or armed groups linkages. The Company's Responsible Sourcing Policy due diligence ensures that supply chain aligns with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).</p>
Equitable Change and Transition	<p>Kamoa Copper recognises that changes in its operations from the opening to, the development, operation and closing of the mines, can have significant effects on host communities exposed to local contexts and increasingly global ones. Kamoa Copper is committed to working with host communities in changes and transitions periods to achieve long-term mutual value.</p>
Civil Society	<p>Kamoa Copper broader stakeholders' engagement fora provide access to civil society input and feedback in various sustainability fields that the Company recognizes as an opportunity to learn, to adequately develop standards and proactively meet relevant expectations as the Company supports the work of human right defenders while acknowledging the challenges and the risks that they sometimes face.</p>

	POLICY		1013-PL-27-024	
	Human Rights Policy		REVISION NR	000
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	<p>Kamoa Copper stands on a principle to always abide by the laws and regulations applicable in the jurisdiction as embodied in the UN Guiding Principles on Business and Human Rights that outlines the State’s duty to protect human rights. The Company engages with governments and regulators, supporting efforts to improve policy coherence, and reinforcing the need for more effective government action and, where appropriate, for business to be involved.</p>
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10. Exception to Policy

There is no exception to this Policy

11. Policy Review

This Policy will be reviewed bi-annually or as needed to ensure it remains current and effective. Any changes to the Policy will be communicated to all covered individuals.