

## **HUMAN RIGHTS POLICY (THE 'POLICY')**

Central Asia Metals plc (CAML, the Company, or 'Group') is committed to upholding fundamental human rights, as defined in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The Group aims to develop a strong organisational culture which upholds and supports internationally recognised human rights, guided by the UN Guiding Principles on Business and Human Rights (**UNGPs**).

### **Purpose**

The purpose of this Policy is to outline CAML's commitment to respecting and promoting the human rights of those working for the Group and those working with the Group as well as the stakeholders affected by its operations.

### **Scope**

This Policy is valid for all Group companies and subsidiaries where the Company holds a controlling interest and applies to all employees, officers and directors, as well as contractors and service providers who work with and/or under the direction of the Group.

### **Key Policy Principles:**

- To recognise and respect applicable laws and legislation on internationally recognised human rights and implement practices and policies in line with the UNGPs.
- CAML is committed to providing a stable, secure and safe working environment for all of its employees and contractors.
- CAML maintains a Code of Conduct, which sets out the expectations for its employees and business partners, including grievance mechanisms for reporting human rights impacts.
- The Group values the right of individual expression and prohibits unlawful discrimination as well as discriminatory practices when it comes to recruitment, training and promotion, particularly in respect of protected characteristics.
- CAML supports diversity in all forms in the workplace, along with freedom of thought, expression, belief and opinion.
- The Group treats all workers with dignity and enforces a zero-tolerance policy for harassment, whether it be physical, verbal or psychological.
- CAML applies its standards and policies, as far as reasonably achievable, to suppliers, including those in upstream and downstream supply chains, partners and third-party contractors, to promote an ethical supply chain through the Group's Supplier Code of Conduct.
- The Group ensures that its guiding principles of equal opportunity, fair treatment and fair remuneration are adhered to across all operations.
- CAML complies with working hours laws and adheres to regulations concerning employee benefits and contractual employment rights to provide fair remuneration.

- The Group respects and abides by all applicable laws regarding modern slavery, child labour, human trafficking and involuntary servitude as outlined in its Modern Slavery Statement, which can be found on the Company's website: <https://www.centralasiametals.com/corporate-governance/modern-slavery-act/>
- CAML acknowledges workers' freedom of association and the right of employees to bargain collectively within prescribed laws, communicating issues to management through designated employee or trades union representatives.
- We manage security-related human rights risks at our sites as they pertain to all our security personnel.
- We maintain stakeholder engagement plans which provide communication protocols, guide meaningful discussions with our surrounding communities and project-affected people, and outline non-judicial grievance mechanisms available to them.
- We monitor and report on human rights impacts and the effectiveness of this Policy through regular impact assessments, which we commit to conducting every three years.
- We ensure that where human rights impacts are identified, measures are taken to investigate, remedy the relevant adverse impacts and prevent future occurrences in line with our standard procedures.
- We regularly review and assess environmental impacts to reduce the environmental footprint of the Group in line with our Environmental Policy.

### **Importance of stakeholder and community engagement**

The Group will ensure there is ongoing regular engagement with external stakeholders. We are committed to open and transparent engagement with the surrounding communities such that they are fully aware of the lines of communication available to them in the event of a potential human rights issue and that they feel sufficiently empowered to raise it with the Group through our grievance mechanisms or under our Whistleblowing Policy.

### **Management of the Policy**

The General Counsel and our sustainability teams help to manage the Policy, and our senior management plays a paramount role in communicating and overseeing the implementation of the Policy on the ground at sites and in monitoring its effectiveness.

- The Group communicates the Policy not only to our employees, through annual compliance training efforts, but also to on-site contractors through annual training seminars and more widely to our external stakeholders through the Company website.
- The Group includes human rights criteria into its due diligence exercises within the procurement process to assess and manage risks when engaging with suppliers and external parties.
- Additionally, our Supplier Code of Conduct contains social criteria according to which suppliers may be screened and vetted according to their responses.
- Further, we are committed to conducting regular human rights impact assessments to identify actual or potential impacts and to minimise or remediate them, as appropriate.

## **Reporting of human rights concerns**

The Group expects its personnel not only to abide by the ethical business standards highlighted in this Policy and within the Code of Conduct, but also to speak up where they become aware of any unethical behaviour both within the Group or along its supply chains. This way we can help ensure that we are monitoring potential abuse and reporting them transparently through our Sustainability Report in line with global standards.

In addition to our internal grievance procedures and the Code of Conduct, which encourages speaking out by the wider community, we have a [Whistleblowing Policy](#) in place which enables employees and third parties to voice their legitimate concerns through an anonymous, external hotline which operates 24/7 in site-languages.

Through our Whistleblowing Policy, management may be duly informed about potential incidents and questionable conduct, including non-adherence to international human rights laws. This allows for concerns to be addressed in a systematic way, providing further assurances of our commitments to human rights.

## **Approval**

CAML's Board of Directors has ultimate responsibility for the Policy. The General Counsel is responsible for the implementation of this Policy, alongside the sustainability teams and general directors at each site of operation. This Policy has been approved by CAML's Board of Directors.

## **Review**

This Policy will be reviewed and updated annually to ensure alignment with business needs. Any changes will be submitted to the Board of Directors for approval, published on the Company's website, and communicated to employees.