

HUMAN RIGHTS

Management approach:

CAML is committed to fundamental human rights, as defined in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Our Board-approved Human Rights Policy applies to all employees, contractors, subsidiaries, joint ventures and supply chain partners, promoting a strong organisational culture which respects internationally recognised human rights.

Our approach is guided by the United Nations Guiding Principles (UNGPs) on Business and Human Rights, ensuring human rights considerations are embedded across our business in risk assessments, community engagement, governance, supply chain management and decision-making. We are committed to a safe, inclusive workplace which upholds diversity, equal opportunity, fair pay and compliance with labour laws, while strictly prohibiting harassment[1], bullying[2], or other behaviours that are intentionally or non-intentionally threatening, hostile or humiliating. We mitigate potential human rights risks by maintaining high occupational health and safety standards, supporting freedom of association and ensuring safe working environments.

Beyond our workforce, we actively assess and manage human rights risks in the communities in which we operate. Our approach aligns with global standards[3], ensuring that our operations do not infringe the rights of our community members. Through regular risk assessments and continuous communication, we work to safeguard the well-being and dignity of project-affected people. We are committed to meaningful engagement with local stakeholders and minimising environmental impacts.

We uphold strong ethical standards in our supply chains, requiring suppliers to adhere to good governance and local legal compliance, and to uphold human rights, safety and environmental standards. Workers' rights to association and collective bargaining are protected, and our procurement strategies aim to ensure fair competition whilst reinforcing our commitment to human rights and responsible business practices.

Security

Security personnel at both operations are primarily responsible for monitoring site access and conducting alcohol tests. They are not authorised to use force, unless strictly necessary. Their role is focused on observation and reporting access concerns to management. The Human Rights Policy applies to all security providers, who also participate in the Group's annual human rights training. Monitoring systems, such as CCTV, are in place to document and review relevant incidents.

Modern Slavery

CAML respects and complies with all applicable laws concerning modern slavery, child labour, human trafficking and involuntary servitude. Our Board-approved Modern Slavery Statement, reviewed annually and published on our website, outlines our approach.

Given the international nature of our supply chains, human trafficking remains an area of ongoing focus. New suppliers are required to sign a declaration under our Supplier Code of Conduct confirming there is no child labour or forced labour in their operations. Although we do not consider child or forced labour to be material topics for reporting purposes, we continue to monitor risk exposure through supplier due diligence and contract provisions. In furtherance of this, our commercial contract templates require adherence to ILO Core Conventions and the International Bill of Human Rights.

Ensuring an effective approach

Transparent reporting is key to demonstrating accountability, tracking our progress and building trust with stakeholders in our human rights commitments. We disclose our approach and performance annually in our Sustainability Report.

Impact assessments and due diligence

We conduct human rights impact assessments every three years to identify risks, inform prevention strategies and implement improvements. Procurement policies across the Group require due diligence during supplier selection, with Group-wide guidelines in place to identify high-risk suppliers and trigger enhanced assessments when needed. Our commitment to human rights is embedded in strategic decision-making and partnership evaluations. We assess potential risks in specific jurisdictions and have declined business opportunities that conflict with our values.

Training and communications

Our Human Rights Policy is publicly available on our website and shared with employees via site-based management. We maintain an open-door policy for questions about the implementation of our policies and procedures. Senior management regularly visit site and meet with managers to explain policy changes, discuss implementation and gather feedback.

Why it matters?

At CAML we believe a strong approach to human rights is fundamental to fulfilling our corporate responsibilities, not only for our employees but also for those within our supply chain and the communities where we operate.

As an extractives company with a large workforce in emerging markets, we recognise the human rights risks associated with our labour-intensive, output-driven industry and cross-border supply chains. These include risks related to labour conditions, fair wages and workplace safety.

Where our impact occurs:

- CAML Group operations and supply chains
- Our local communities

Reporting frameworks and initiatives:

- Various GRI Standards

Relevant long-term targets:

- Zero human rights abuses

Associated SDG's:



ENSURING ETHICAL PRACTICES

[1] Harassment is behaviour which, by its nature, is unwelcome, intimidating or offensive

[2] Bullying is defined as systematic verbal, physical, social or psychological abuse

[3] The Global Industry Standard for Tailings Management (GISTM) and UNGPs

Community engagement is an essential part of our human rights practices. Our operations focus on building respectful, transparent and ongoing dialogue with local communities. Both operations follow Stakeholder Engagement Plans, within their Social Management Systems, implemented by our dedicated Social Affairs Co-ordinators. We maintain community offices for drop-ins and regularly engage with community members to understand and respond to their concerns. A key part of our approach is the community grievance mechanism, which provides stakeholders with a way to share feedback and seek resolution. We actively seek community feedback to help refine our engagement strategies and assess the effectiveness of our approach. For more information on how we engage with our local communities, including how we address and resolve community grievances, see our Community Engagement Factsheet.

Annual targeted training is provided for risk-assessed employees and on-site contractors through a dedicated online compliance training platform, helping to build awareness of human rights, supply chain impacts and reporting procedures. Training on the same concepts are provided to on-site contractors via video presentations and in-person seminar style workshops.

Grievance mechanisms

In line with the International Finance Corporation Performance Standards and our Stakeholder Engagement Plan (SEP), CAML operates formal complaint and grievance mechanisms at both operations. These channels provide employees, local communities and business partners with a mechanism to raise concerns about adverse human rights impacts linked to our activities or supply chains.

Employees can report concerns confidentially via suggestion boxes, with their line managers (under our internal grievance policy), or through union representatives. Community members can raise concerns through our site-based offices. All grievances, both formal and informal, are logged, reviewed and tracked to ensure timely, transparent resolution. Community grievances are reviewed by local sustainability teams, with non-judicial remedies such as compensation, direct assistance or policy changes applied as needed. Critical issues are escalated to the Sustainability and Audit Committees, with unresolved matters eligible for third-party mediation.

Whistle-blowing

We take policy violations seriously and view whistle-blowing as a vital tool for reporting unethical behaviour or misconduct without fear of reprisals. Our independent, multilingual whistle-blowing hotline – operated 24/7 by Navex Global – ensures confidential and, if requested, anonymous reporting in English, Russian and Macedonian. All concerns are addressed sensitively and promptly, with reports shared with the General Counsel and escalated to the Audit Committee where appropriate.

The mechanism is widely communicated through a number of channels, including: our Whistle-blowing Policy (which provides contact details for designated Board and management members, is issued in local languages and signed during onboarding), site inductions, noticeboards at our sites and offices, the corporate website, our Code of Conduct and targeted campaigns. It is also embedded within our community grievance procedures and Supplier Code of Conduct to ensure comprehensive accessibility.

Responsibility and accountability

CAML's Board is ultimately responsible for ensuring adherence to our human rights commitments, supported by the General Counsel, who helps to manage the Human Rights Policy with our operations' general directors, supported by site senior managers playing an important role in its communication, implementation and oversight on the ground.

Upholding human rights is a shared responsibility across all levels of the organisation, reflecting our core value of respect and trust. All employees are accountable for ensuring our operations respect and protect the rights of all stakeholders.