

Human Rights Policy



In line with our values and our vision, MMG Limited and its subsidiaries (MMG) believe in the dignity of every human being. We are committed to respecting human rights of our stakeholders, employees and contractors, workers in our supply chain, our communities, and other groups who may be impacted by our activities.

This Policy provides a framework for our approach to human rights and applies to our employees, contractors and directors.

MMG respects internationally recognised human rights, as set out in the International Bill of Human Rights (which comprises the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), and the core labour standards set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

MMG is committed to implementing the United Nations' (UN) Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (OECD Guidance), the Global Industry Standard on Tailings Management (GISTM), the Voluntary Principles on Security and Human Rights (VPSHR), and the International Council on Mining and Metals (ICMM) Mining Principles. We also seek to align our approach with the UN Sustainable Development Goals.

We respect human rights by:

- rejecting any form of modern slavery, forced or child labour, and working to ensure that such practices are not present in our business or our supply chain;
- respecting the labour rights of our employees, contractors and workers in the supply chain, including rights relating to health and safety, non-discrimination and harassment, freedom of association and collective bargaining, and working hours;
- respecting the livelihoods, safety, health and wellbeing of the communities in which we live and operate, and minimising our adverse environmental and social impacts throughout the lifecycle of our operations;
- conducting security arrangements in accordance with the VPSHR and requiring private security companies to be signatories to or agree to comply with the International Code of Conduct for Private Security Providers;
- acknowledging the importance of engaging in a constructive manner with human rights defenders and the stakeholders they represent;
- respecting Indigenous Peoples' human rights, perspectives, and special connections to lands, waters, culture and cultural heritage, in accordance with the UN Declaration of the Rights of Indigenous Peoples;
- working to obtain the Free, Prior and Informed Consent of Indigenous Peoples, consistent with the ICMM Position Statement on Indigenous Peoples and Mining;
- avoiding involuntary resettlement of community members, and where this is not possible, applying the International Finance Corporation's Performance Standard 5;
- recognising the connection between human rights and environmental impacts, including climate change, working to minimise our environmental impacts, and supporting the global transition to a lower carbon economy; and
- managing our tailings storage facilities and the potential for adverse human rights impacts in accordance with GISTM.

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To meet our commitments, our approach to human rights involves:

- complying with local laws and applying international human rights standards where local laws are weaker, and if there is a conflict between local law and international human rights standards, we will comply with the law while seeking ways to respect international human rights standards;
- conducting ongoing human rights due diligence to identify, prevent, mitigate and account for human rights risks and impacts, giving particular consideration to vulnerable¹, marginalised and at-risk groups;
- identifying and prioritising our salient human rights impacts;
- integrating human rights considerations into our risk and impact assessments, and MMG Policies and MMG Standards on People, Supply, Health and Safety, Social Performance, Security, Environment, Community, Legal, Risk, and others as appropriate;
- providing effective grievance processes, including our Whistleblower Framework and stakeholder grievance management process, that enables our stakeholders to report instances of improper conduct without fear of intimidation or reprisal;
- providing for or cooperating in remedy, in the event where we identify that we have caused or contributed to an adverse human rights impact, and evaluating the role we may play in remediation where we are directly linked to an adverse human rights impact.
- adopting engagement and consultation processes that ensure the meaningful participation of affected and potentially affected rights holders, including provisioning for culturally and linguistically diverse groups, and vulnerable, marginalised and at-risk groups;
- seeking to work with suppliers and other business partners that respect human rights, and setting expectations for them in relation to human rights;
- conducting relevant human rights training for our people; and
- tracking the effectiveness of the measures taken and communicating on our human rights performance.

This Policy is approved by the Board and supported by MMG Standards, MMG Frameworks and processes that define the way the MMG operates.

A handwritten signature in black ink, appearing to be the Chinese characters '曹亮' (Cao Liang).

Liang Cao

Chief Executive Officer

June 2024

¹ Vulnerable groups may include Indigenous Peoples, human rights defenders, households headed by women or children, people with disabilities, the extremely poor, the elderly, religious and ethnic minorities, migrant workers, minorities, LGBTQ+ and gender-diverse people, and in some societies, women.