

ACG Metals Limited

Human Rights Policy

30 June 2026

The ACG Human Rights Policy is a commitment to creating value for our shareholders while contributing to the wellbeing of our employees, their families, contractors and the communities where we operate, and respecting the human rights, culture, customs and values of those affected by our activities. We have developed a Code of Conduct and Ethics and expect our contractors, suppliers and employees as appropriate to comply with that and this policy. We will review this policy every two years.

We value and respect the religious beliefs, traditions, cultures, values and resources of the communities in which we operate, and we recognise the particular importance of upholding the rights of socially marginalised and vulnerable individuals and groups including indigenous peoples. Our policy is to conduct our business in a manner consistent with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights (having due regard to practical circumstances) and relevant national law in our countries of operations.

The human rights covered by this Policy include the following:

- Internationally recognised human rights as expressed in the International Bill of Human Rights (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;
- The specific rights of other groups who might be at heightened risk of adverse impacts from our operations and are protected by relevant UN instruments, including ethnic, religious and linguistic minorities, women, children, persons with disabilities, migrant workers and their families.

We are committed to avoiding human rights impacts, addressing adverse human rights impacts related to our activities and reporting adverse human rights impacts to the appropriate authorities. We will collaborate with the responsible authorities to achieve outcomes consistent with this policy, including in situations where the government is responsible for managing human rights issues in a way that limits company involvement. Where applicable laws or requirements prohibit us from upholding this policy, we will seek ways to ensure respect for human rights to the greatest extent possible. In our relationships with host governments, contractors and third-party service providers, we seek to avoid being complicit in adverse human rights impacts.

ACG is committed to:

Labour, workplace and supply chain

We will provide safe, healthy and secure working conditions, with fair pay and working hours.

- We will treat our employees, contractors and suppliers fairly and without discrimination; we will promote diversity and inclusion in the workplace and foster a culture that encourages transparency, accountability and open communication.
- We will not tolerate discrimination against individuals on the basis of race, colour, gender, sexual orientation, religion, political opinion, nationality, ethnicity or social origin, or harassment, threats, intimidation or attacks against any individuals.

- We will enable our employees to report grievances or instances of unacceptable conduct without fear of intimidation or reprisal through appropriate channels, including employee grievance mechanisms and the Whistleblower Policy.
- We recognize and respect employee rights to free speech, and the freedom to join or refrain from joining legally authorized associations or organizations, and the principle of collective bargaining.
- We reject any form of slavery, forced labour or child labour, and will ensure that such practices are not present in our business or our supply chain.

Responsible operations

- We will align our policies with good practice for the mining industry. We will regularly review and update our policies as required.
- We will treat local communities and all stakeholders affected by our operations fairly and without discrimination.
- We will conduct due diligence to identify the local communities and other stakeholders affected by our projects and to understand the actual and potential human rights impacts of our operations, especially on those who are particularly vulnerable to negative impacts or to exclusion from the benefits of mining activity, and those who are highly dependent on the land and water for their livelihoods and cultural practices. Social, environmental and cumulative impact assessments will be undertaken in an inclusive manner and will feed into corresponding management plans and systems over the life of the project.
- We will employ best available technologies and working practices to avoid, minimise and manage negative environmental and social impacts.
- We will compensate in a fair and appropriate manner for unavoidable impacts.
- This Policy will be communicated internally and externally (including to all our employees, contractors, suppliers and external stakeholders).
- Contractors and third-party service providers will be required to be aware of, and comply with, this Policy.
- If we determine that our employees, contractors or third parties acting on our behalf have caused adverse human rights impacts, we will take appropriate remedial action.

Meaningful community engagement

- At all times, we will act with respect towards local communities affected by our operations, we will listen to their ideas and concerns and ensure fairness and good faith in all our interactions.
- In all our engagement with all local communities affected by our activities, we will follow the principles of meaningful stakeholder engagement, especially for those who are identified as particularly vulnerable or having specific rights, such as Indigenous peoples.
- We will not benefit from another party's unawareness of their rights.
- As early as possible in the project life cycle, we will agree a culturally appropriate and good faith engagement and consultation process to ensure the ongoing meaningful participation of affected communities in decision making. We will ensure that participation in consultation activities does not present a financial or resource burden on participating communities, and we will cover reasonable costs of participation.

- We will avoid the resettlement of local communities and any impacts on cultural heritage to the extent possible. If such impacts cannot reasonably be avoided, we will follow good practice for the mining industry regarding meaningful engagement, mitigation and remediation.
- We will co-design and implement sustainable benefit-sharing programmes with local communities that are affected by our operations.
- We will establish project-level grievance mechanisms that are accessible to, and culturally appropriate for, local communities, to enable our stakeholders to report instances of unacceptable conduct without fear of intimidation or reprisal and to address and resolve grievances in a timely, fair and effective manner. We will not obstruct affected stakeholders' access to other remedies or channels for remedy.

Implementation

- In order to ensure the implementation of this policy, we will:
- Monitor and report on human rights impacts and the effectiveness of this policy through regular assessments (every 3 years).
- Ensure that where impacts are identified, measures are taken to investigate, remedy adverse impacts and prevent future occurrences.
- Include Human Rights criteria in due diligence within acquisition and procurement processes and manage risks when engaging with third party suppliers
- Carry out annual compliance training with employees, contractors and external stakeholders.

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