



# HUMAN RIGHTS POLICY

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## 1. INTRODUCTION

Human rights are rights and freedoms to which all people are entitled to without discrimination, and which encompass political, civil, economic, labour, social and cultural aspects.

Open Mineral AG and all its affiliated companies (together referred to as '**OM Group**') understand with utmost importance that we have a responsibility in respect of the internationally recognised human rights and operate in a manner contributing to the protection of human rights. This policy encompasses our commitment to respect, protect and avoid infringing human rights and sets out the steps we take to contribute to positive human rights outcomes throughout our business.

## 2. APPROACH

We respect the rights of people involved in our business operations and implement suitable measures to identify and address any actual or potential adverse impacts on human rights which we may cause or contribute to through our business activities. Furthermore, we understand that such impacts could arise not only in our operation links directly but also in our products or services or within our business relationships.

## 3. OUR COMMITMENT

We demonstrate our commitment to upholding human dignity and the associated fundamental freedoms by:

- Adhering to the United Nations (UN) Universal Declaration of Human Rights, UN's Guiding Principles on Business and Human Rights, the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, in particular Convention No.138 on Minimum Age, Convention No. 182 on the Worst Forms of Child Labour and ILO-IOE Child Labour Guidance Tool for Business of 15 December 2015; OECD Due Diligence Guidance for Responsible Business Conduct, and the Swiss Federal Government's Ordinance on Conflict Minerals and Child Labour throughout our business operations;
- Complying with applicable laws and regulations of the countries in which we operate and conduct business;
- Providing a workplace that respects all our employees' human rights and taking a zero-tolerance approach to any form of discrimination in respect of employment and occupation and we do not tolerate any form of slavery, forced or compulsory labour or child labour within our organisation or within our supply chains;
- Identifying root causes of human rights issues within the nature of our business and seeking to avoid causing or contributing to adverse human rights impacts through our own activities;
- Regular evaluation and review on how we can strengthen our approach to protecting human rights and identify any new risks arising as OM Group's operations evolve over time.

## 4. EXPECTATIONS OF OUR SUPPLIER'S AND TRADING PARTNERS

In addition to our commitment, OM Group have an expectation of suppliers and trading partners. We expect that they follow and adhere to applicable standards and guidelines to promote and ensure that labour and human rights are respected during the course of their operations, activities and supply chains where applicable. Therefore, we expect that the above mentioned standards and the following standards and guidelines are adhered to:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- UN Global Company Principle on Human Rights.
- Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process – Environmental, Social and Governance (ESG) Standard for Mineral Supply Chains (Section VII. Social Standards).
- International Council on Mining and Metals (ICMM) – Mining Principles: 1. Ethical Business, and 3. Human Rights.
- The International Finance Corporation's (IFC) Performance Standards: 2. Labour and Working Conditions, 5. Land Acquisition and Involuntary Resettlement, 7. Indigenous Peoples, and 8. Cultural Heritage.
- Compliance with all applicable laws and regulations of the countries in which they operate and conduct business.

## 5. GRIEVANCES AND CONCERNS

If any stakeholder has any grievances or has become aware of any potential human rights impact related to our conduct or business operations, OM Group encourages individuals, companies and communities to reach out and raise a concern with our Compliance Team ([compliance@openmineral.com](mailto:compliance@openmineral.com)). This enables OM Group to address any concern regarding the existence of potential or actual adverse effects related to human rights.

Where there are inquiries or adjudicating allegations in relation to human rights impacts, we aim to cooperate as required and to the best of our ability, with the competent authorities of such investigations.

## 6. GOING FORWARD

We shall continue to conduct our business in a manner which allows us to fulfil our responsibility to respect human rights and act in accordance with the laws, principles and guidelines as well as the principles and guidance set forth herein and the international Corporate Social Responsibility standards set out by the Swiss Federal Council.

OM Group commits to continuously evaluate, self-criticise and review our approach in protecting human rights and ensure our conduct fosters effective implementation of measures to achieve our commitment.

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