

Human Rights Policy



In line with our values and our vision, MMG Limited and its subsidiaries is committed to respecting human rights and believes in the dignity of every human being. MMG acknowledges and supports human rights as defined in the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the core labour standards set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Our Values and our adherence to initiatives such as the Voluntary Principles on Security & Human Rights demonstrate this support.

We recognise that human rights cover a broad range of interrelated issues, requiring an integrated approach across numerous business functions and across the life of our assets. Our Human Resources, Supply, Social Performance, Stakeholder Relations, Security, Geoscience and Discovery and Project Development functions have specific responsibilities for upholding our commitment to human rights with the support of our employees, governments, communities and suppliers.

Our approach to managing human rights risk is embedded into our broader risk management framework, processes and standards by:

- integrating human rights considerations into our employment processes, risk-analysis activities and formal grievance processes.
- developing processes to enable our stakeholders to report instances of unacceptable conduct without fear of intimidation or reprisal.
- adopting culturally appropriate engagement and consultation processes that ensure the meaningful participation of vulnerable people and indigenous communities, particularly in decision making.
- respecting the human rights, interests, special connections to lands and waters, and perspectives of indigenous peoples and communities in which we live and operate, including by having processes for providing access to remedies where we make an impact.

We operate in accordance with international frameworks by:

- respecting human rights as outlined in the ICMM Sustainable Development Framework and participate in member discussions and peer learning on a wide range of business and human rights issues.
- aligning our Social Investment with the United Nations Sustainable Development Goals.
- adhering to the intent of the Voluntary Principles of Security and Human Rights and seeking membership of the Voluntary Principles Initiative.
- working to align our practices with the core conventions of the ILO, focusing on human rights which are directly applicable to business.
- rejecting any form of slavery, forced or child labour, and working to ensure that such practices are not present in our business or our supply chain.
- reporting Human Rights risks in accordance with the Modern Slavery Act.
- obtaining Free Prior and Informed Consent of Indigenous peoples where required by the ICMM Position Statement on Indigenous Peoples and Mining, through processes that are consistent with traditional decision-making processes.
- Implementing site level grievance mechanisms consistent with the 'remedy' provisions of the United Nations Guiding Principles on Business and Human Rights.
- acknowledging the importance of collaborating in a constructive manner with human rights defenders and the stakeholders they represent and recognising that freedom of expression and assembly is a fundamental Human Right.

This Policy will be supported by MMG Standards and processes that define the way the MMG Limited and its subsidiaries operate.

A handwritten signature in black ink, appearing to read 'Geoffrey Gao'.

Geoffrey Gao

Chief Executive Officer

October 2019