

# Human Rights Policy



In line with our values and our vision, MMG Limited and its subsidiaries (MMG) are committed to respecting human rights and believe 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 Organisation for Economic Co-operation and Development (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 and 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. This policy provides a framework for MMG's approach to human rights. This framework is further translated to MMG's policies on People, Health and Safety, Environment (as appropriate) that also contain human rights commitments. Our Human Resources, Supply, Social Performance, Stakeholder Relations, Legal, Safety, Security, Health and Environment (SSHE), Operations and Technical Excellence 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 Company policies, including the MMG Code of Conduct and Supplier Code of Conduct, employment processes, risk-analysis activities and formal grievance processes, including the Whistleblower Framework and Stakeholder Grievance Management Work Quality Requirements.
- developing processes to enable our stakeholders to report instances of improper 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 International Council on Mining and Metals (ICMM) Mining Principles 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, particularly goals 1-6.
- adhering to the Voluntary Principles on Security and Human Rights, through our Engaged 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 any risks of modern slavery in our operations and supply chains and steps taken to address those risks, in accordance with the Australian Government's Modern Slavery Act 2018 (Cth).

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- 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.
- ensuring all processes include provisions for culturally and linguistically diverse (CALD) groups, vulnerable groups, Indigenous People, women, children and people with disabilities to be able to access grievance mechanisms and engagement channels.
- 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 is 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'.

**Geoffrey (Xiaoyu) GAO**  
Chief Executive Officer

October 2021