



# VOLUNTARY PRINCIPLES INITIATIVE 2021

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# INTRODUCTION

MMG Limited (“MMG,” “the Company”) was accepted as an Engaged Member of the Voluntary Principles Initiative (VPI) in May 2020. This report is the second VPI report as an Engaged Member covering the period from 1 January to 31 December 2021. As this is an Update Report, it incorporates references to our 2020 Full Report where no material change has occurred in the past year.

As an organisation with global operations, MMG’s business has been significantly affected by the spread and global impacts of the COVID-19 pandemic. Across our business, we implemented additional health, safety, hygiene and physical distancing controls to reduce the risk of transmission. Our teams have also worked collaboratively with local communities to ensure they have sufficient resources available while continuing with day-to-day operations at each site, to the extent it was safe to do so. The challenges of the pandemic have continued to impact the execution of our VPI action plan.

## LAS BAMBAS (PERU) SITE

The Peruvian Government commenced its COVID-19 vaccination campaign in February 2021.

As of 15 December 2021, more than 46 million doses have been administered and 19.9 million people have completed the vaccination regime, representing 71% of the target Peruvian population. Approximately 2.1 million people have also received the booster dose. These results have allowed the Government to ease restrictions and to encourage economic reactivation.

Las Bambas continues to apply up-to-date protocols for the prevention and control of COVID-19 on-site and has supported non-operational personnel to work remotely wherever possible.

## KINSEVERE (DRC) SITE

During the first half of 2021, Kinsevere continued to operate with increased levels of controls to ensure the health and safety of its people.

In July 2021, the DRC Government announced the third wave and reinforced measures and restrictions. During that period, international and domestic flights to Kinshasa were

suspended and the MMG Kinshasa and Johannesburg offices were closed temporarily. Operations were supported by a reduced workforce as many MMG employees were in isolation due to the significantly increasing number of confirmed cases and contacts.

The Kinsevere mine resumed full operations in late September 2021, with increased levels of controls to protect people’s health and safety. As of December 2021, all non-operational personnel are again working remotely if possible.

## ROSEBERY (AUSTRALIA) SITE

Our operations continued normally with significant self-distancing measures in place, coupled with increased sanitation, cleaning and awareness-raising.

## DUGALD RIVER (AUSTRALIA) SITE

Our operations continued normally, with strict controls around social distancing and hygiene. We have worked proactively with the Queensland Resources Council and the Queensland State Government to ensure our controls meet the state’s COVID-19 control requirements.

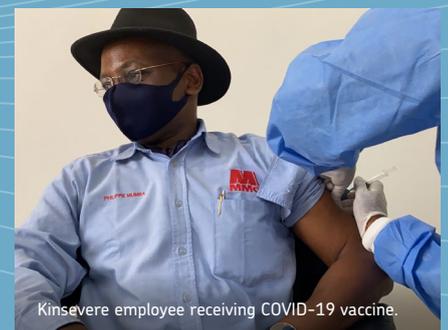


Employees at Las Bambas operation, Peru.

## MMG approached its response to the COVID-19 pandemic through a human rights lens.

We recognise that public health emergencies such as COVID-19, have far-reaching and long-lasting implications for communities, their livelihoods and wellbeing.

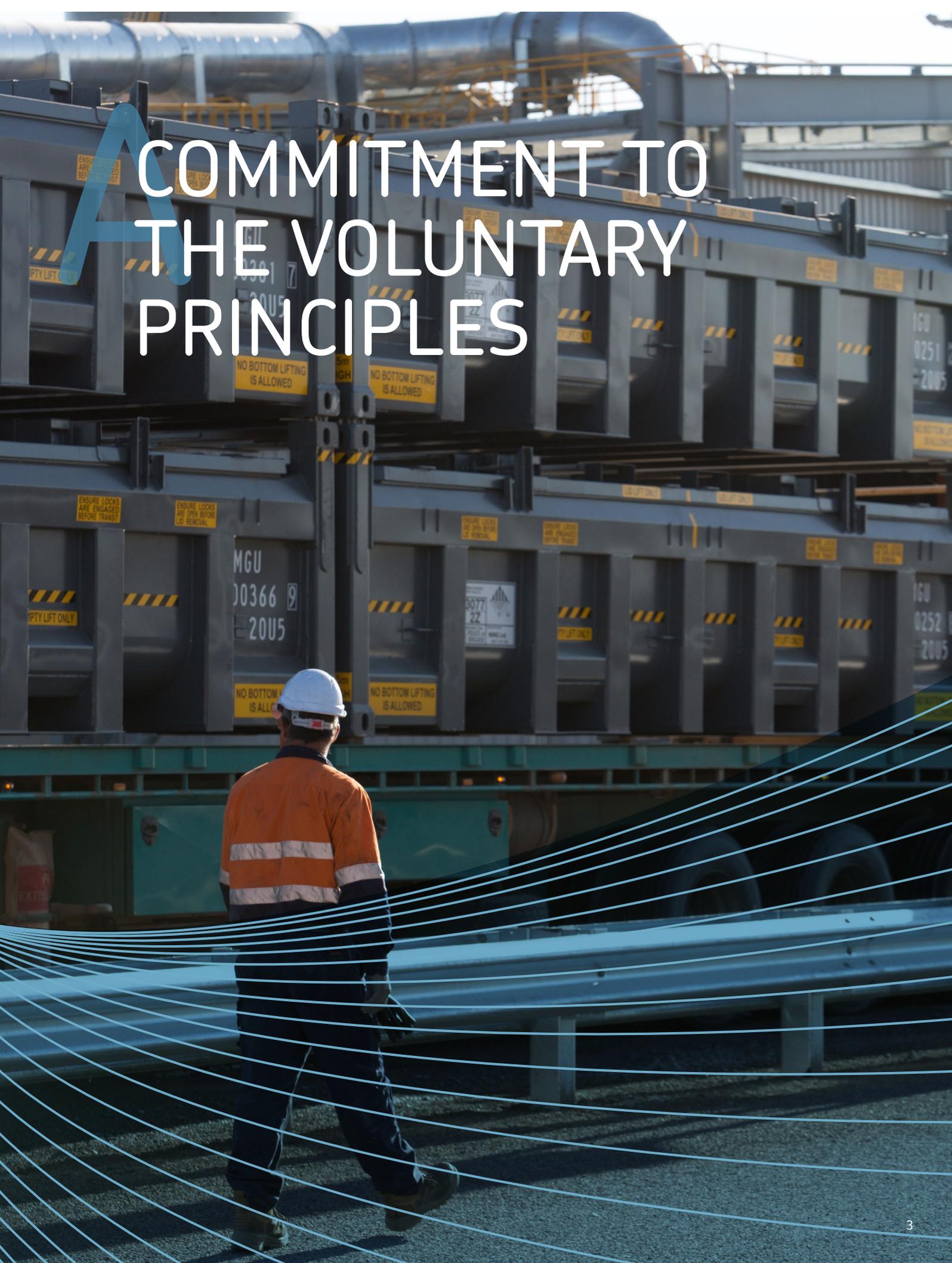
MMG took into consideration the most appropriate support required by its host communities and regions and continued to predominately focus on supporting health and hygiene initiatives, support for local and regional government and food security programs.



Kinsevere employee receiving COVID-19 vaccine.

“ We recognise that public health emergencies such as COVID-19, have far-reaching and long-lasting implications.

# A COMMITMENT TO THE VOLUNTARY PRINCIPLES



# A. COMMITMENT TO THE VOLUNTARY PRINCIPLES

## 01. Public Commitment and Endorsement

Implementing the Voluntary Principles on Security and Human Rights (VPSHR) is important to MMG throughout its global portfolio, with a particular focus on identifying and managing risks in the DRC and Peru. Our commitment to, and endorsement of, the VPSHR is as reported in MMG's 2020 Full VPI Annual Report.

MMG has issued a public statement on its corporate website stating its affiliation and engaged membership with the VPI and has also endorsed the VPI through the MMG Human Rights Policy (both available [here](#)).

## 02. Transparency

MMG's approach to transparency remains consistent with that reported in the 2020 Full VPI Annual Report. In addition, MMG updated its grievance management process by launching an external facing Stakeholder Feedback Portal in 2021. This portal provides an easy-to-use self-serve online platform for filing grievances, including the option to remain anonymous throughout the entire resolution process, as discussed in the following case study.



## CASE STUDY LAUNCH OF MMG'S STAKEHOLDER FEEDBACK PORTAL

Mining operations have an impact on communities, both positive and negative, and these impacts can at times lead to significant stakeholder concerns. To help MMG manage these concerns, each operation has a site-specific grievance mechanism in place, to facilitate the timely, culturally appropriate investigation and response to grievances by community members. In 2020, MMG undertook a review of our corporate Stakeholder Grievance Management Work Quality Requirement to ensure its alignment with the ICMM's updated guidance document: 'Handling and Resolving Local-level Concerns and Grievances: Human rights in the mining and metals sector (2019)', as well as the International Labour Organisation Declaration of Fundamental Principles and Rights at Work, the Extractive Industries Transparency Initiative and the UN Global Compact. By working

closely with operating sites we identified a need for an easy-to-use, self-serve online platform where grievances are automatically recorded in our stakeholder management system with the important option of remaining anonymous throughout the entire process. In December 2021, MMG launched the online portal to help MMG capture, follow-up and respond to any grievances received. The portal aims to capture a more complete view of our stakeholders' concerns. The portal gives MMG a new way to receive and listen to the feedback and concerns of our communities and allows for transparency in how this feedback is managed and learnt from.

To read more about MMG's commitment to open and transparent stakeholder feedback visit [wemineforprogress.com](http://wemineforprogress.com).

# A. COMMITMENT TO THE VOLUNTARY PRINCIPLES CONTINUED

## 03. Efforts to Promote the VPSHR

We work with private and public security forces at our Kinsevere (DRC) and Las Bambas (Peru) sites. This work involves ongoing training and mentoring on security and human rights.

In 2021, the MMG Peru and DRC human rights working groups consolidated their work by conducting a thorough VPI gap analysis including risk assessments. This analysis informed detailed VPI Action Plans for each site.

A human rights working group for Australian sites: Dugald River and Rosebery, was established in 2021 with representatives from human resources, commercial management, stakeholder relations, legal, supply, social performance and site operations. This working group will support the gap analysis, risk assessment and implementation plan process for the Australian sites to be included in MMG's 2022 VPI Annual Report.

Mandatory Modern Slavery training was completed by MMG's supply and legal teams, human rights working groups and various operational

functions at all sites. The course was designed to familiarise MMG people with modern slavery risks in supply chains, as well as with ways MMG is addressing these risks. Assessments and a Q&A session has informed additional training required in 2022 specifically regarding due diligence and modern slavery risks within the supply function, particularly with high risk suppliers.

MMG's efforts to promote VPSHR internationally in 2021 are as reported in MMG's 2020 Full VPI Annual Report.

VPI awareness and promotion as well as potential human rights risk analysis across the business continue to be reviewed as part of MMG's Code of Conduct and People Committee's charter.

## 04. Engagement with the VPI and VPSHR

In 2021, MMG representatives participated in verification presentations and webinars.



Members of the Rosebery mine Emergency Response Team.

# B POLICIES, PROCEDURES AND RELATED ACTIVITIES



# B. POLICIES, PROCEDURES AND RELATED ACTIVITIES

## 05. Relevant Policies and Procedures

MMG's policies and procedures in relation to security and human rights remain consistent with those reported in MMG's 2020 Full VPI Annual Report including the Human Rights Policy, Code of Conduct, Supplier Code of Conduct, Equitable Treatment Procedure, People Policy and Whistle-blower Framework.

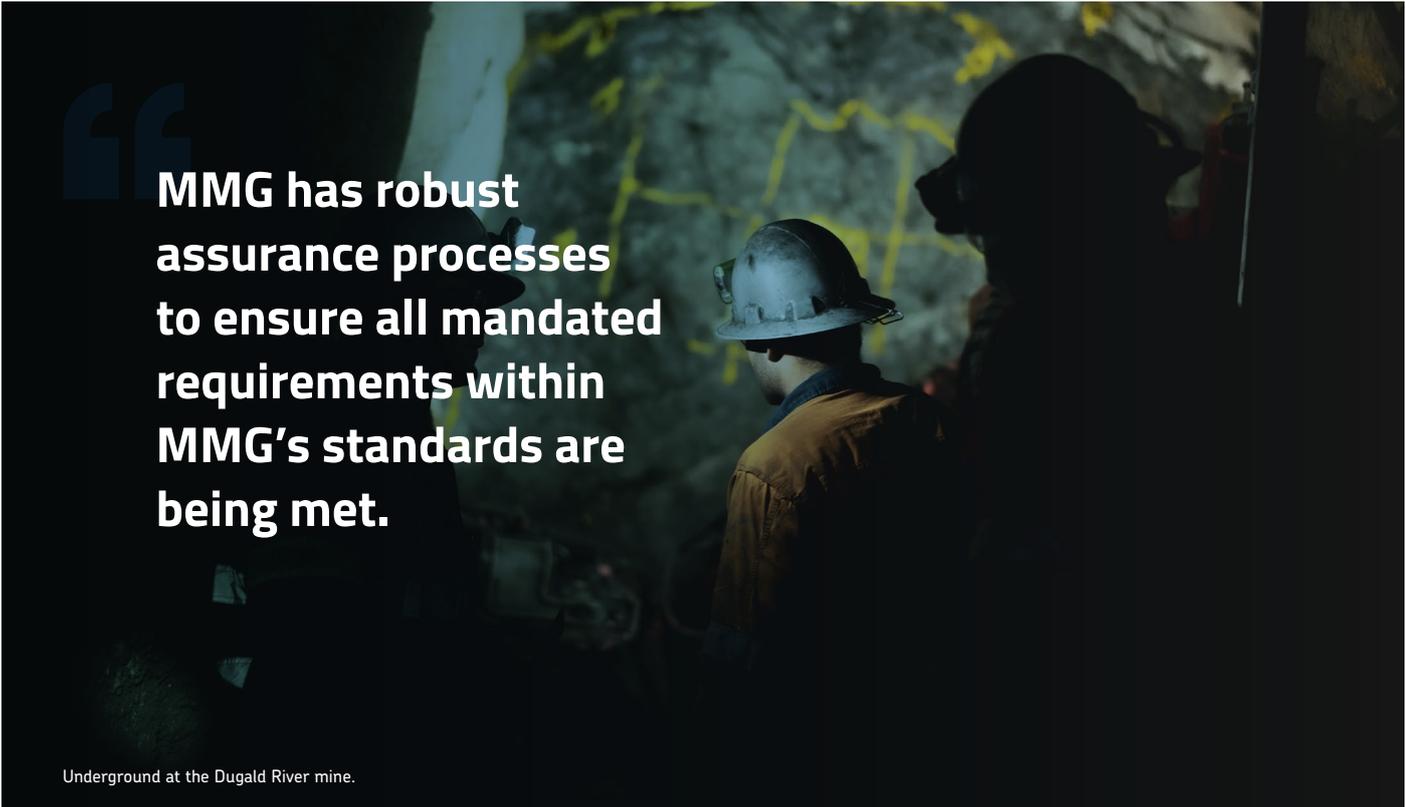
MMG also has robust assurance processes to ensure all mandated requirements within MMG's standards are being met. This 'three lines of defence' approach ensures specific actions are developed and executed to provide line management with first line assurance on the processes executed by the functional department. Processes are then implemented to provide line and functional management with second line assurance on actions executed by assets. Head Office Functional Discipline Lead's (FDL) are responsible for second line, providing assurance to the accountable executive committee member/s and relevant site General Managers. A Board-reviewed and mandated internal audit process provides a third line defence.

VPSHR requirements are included in the SSHE Standard and the SSHE team at Head Office performs first and second line assurance to support and review the implementation of the VPSHR and provide feedback to executive committee members.

MMG issued its first Modern Slavery Statement for 2020 as required under the Modern Slavery Act 2018 (Cth) in May 2021 and is publicly available on [www.mmg.com](http://www.mmg.com) [here](#). MMG's 2021 Modern Slavery Statement is scheduled for release in April 2022.

The Stakeholder Grievance Management Procedure was updated in 2021 with an external facing Stakeholder Feedback Portal being launched. The portal provides an easy-to-use self-serve online platform for filing grievances, with the option to remain anonymous throughout the entire resolution process. The portal facilitates transparency, recording the grievances for follow-up and resolution – keeping all stakeholder records complete and processes standardised. Training has been delivered at each site to support the management of the Stakeholder Feedback Portal. For further information, see the [Stakeholder Feedback Portal Case Study, pg 4](#).

In 2021, performance indicators were developed in order to monitor human rights and/or community related grievance resolution. As of 2022, progress against targets relating to grievance response and resolution times will be monitored by the MMG Executive Committee quarterly.



**MMG has robust assurance processes to ensure all mandated requirements within MMG's standards are being met.**

Underground at the Dugald River mine.

# B. POLICIES, PROCEDURES AND RELATED ACTIVITIES CONTINUED

## 06. Efforts to Increase Employee Awareness and Implementation of VPSHR

MMG's approach to training continues to focus on building a solid foundation and awareness about the VPI across the company.

In 2021, MMG trained 570 public security personnel across the business, with 190 located in Las Bambas and 380 in the DRC. Both operations provided mandatory refresher training for all private security personnel on site throughout the year.



MMG SECURITY TRAINING SNAPSHOT (1 JAN 2021 – 31 DEC 2021)

| TRAINING TOPICS  | COUNTRY | NO. OF PARTICIPANTS WHO RECEIVED TRAINING   |
|--|---------|---|
| <ul style="list-style-type: none"> <li>VPSHR</li> <li>Rules of engagement</li> <li>Detainee transfer procedure</li> <li>Criminal participation (notions of Congolese criminal law and corruption)</li> </ul> | DRC     | <ul style="list-style-type: none"> <li>100 police force members (public security)</li> <li>248 WS Insight employees (private security contractors)</li> <li>33 MMG Security employees</li> <li>381 people in total</li> </ul> |
| <ul style="list-style-type: none"> <li>VPSHR</li> <li>Rules of engagement</li> </ul>   | Peru    | <ul style="list-style-type: none"> <li>25 police force members (public security)</li> <li>165 private security employees</li> <li>190 people in total</li> </ul>  |

The Las Bambas Security team conduct biannual security and human rights training sessions including simulated exercises with all private security forces that work on site, as well as public security forces that operate in the vicinity of the Southern Road Corridor. All security personnel (public and private security), receive recurrent training on VPSHR before commencing any work onsite each day. In June, the Las Bambas human rights working group and other key personnel completed a specialised full day training session on the Universal Declaration of Human Rights, the UN Global Compact and the VPSHR.

At Kinsevere, private security forces receive formal human rights and security training annually including simulated exercises and assessments with regular follow up sessions on site. Daily pre-shift briefings include key security training elements. Any new security personnel must be assessed and provided the relevant level of training on VPSHR prior to being

deployed. Each month, the Kinsevere Head of Security meets with police force leaders to review public security performance onsite. An extensive VPSHR training session for public security was facilitated at Kinsevere in December 2021.

In October, the Kinsevere Social Development team attended a two-day workshop held with the International Labour Office project in partnership with non-governmental organization PACT on strategies to reduce child labour in mining activities, primarily focusing on the cobalt supply chain. The workshop included representatives from artisanal mining groups and mining companies. This workshop has created a dialogue table to hold discussions attempting to solve some of the difficulties encountered in mining activities around Lubumbashi, Likasi and Kolwezi. Follow up meetings have been scheduled.

## B. POLICIES, PROCEDURES AND RELATED ACTIVITIES CONTINUED

### 07. Approach to Risk Assessments

MMG's approach to risk assessments remains consistent with that reported in MMG's 2020 Full VPI Annual Report. In addition, in Peru, human rights risks were included in Las Bambas' risk assessments involving tailings storage facilities, water management, artisanal and small-scale mining activities, unauthorised site access, loss of political and social license to operate, blocking of logistics routes and bribery and corruption.

### 08. Engagement with Security Forces

MMG's procedure to consider the Voluntary Principles when engaging with private security providers remains unchanged from 2020.

In 2021 Kinsevere appointed a new private security company - WS Insight, following a tender process involving numerous suppliers from the region. An evaluation was conducted on both technical capability and commercial outcomes. WS Insight signed a contract committing their adherence and compliance to VPSHR and the International Code of Conduct for Private Security Providers, their performance is also monitored monthly.

Las Bambas extended its Security Memorandum of Understanding (MoU) with the Peruvian National Police force for another two years, ending in October 2023. The MoU includes the requirement to train public security, in compliance with the VPSHR.

As discussed in the [Stakeholder Feedback Portal Case Study, pg 4](#) the launch of the external facing Stakeholder Feedback Portal provides an updated and transparent way to record, report and monitor the handling of any security-related incidents with human rights implications by public/private security forces operating on any MMG sites.



Las Bambas constantly reviews its human rights risk assessment procedures to ensure our risk assessment toolkits provide guidance for our teams to plan strategies to measure and understand community risks onsite.

In 2021, Las Bambas developed a Human Rights toolkit using learnings from the United Nations Voluntary Principals implementation toolkit to enhance our risk assessment process across the business.

The project was developed with the participation from teams across Las Bambas including Security, Community Relations, Public Affairs, Legal, Risk Management and Operations.

As part of this process potential Human Rights risks were identified and using the assessment toolkit, mitigation strategies were developed and actioned.

To learn more about the MMG's commitment to Human Rights and the Human Rights Risk Toolkit visit [wemineforprogress.com](http://wemineforprogress.com).



Site security at Las Bambas mine.

# COUNTRY IMPLEMENTATION



# C. COUNTRY IMPLEMENTATION

## 09. Overview of Country Operations Selected for Reporting

### DRC

- The DRC is still recovering from a series of conflicts in the 1990s. It remains a fragile country with tremendous economic and social development needs, including governance.
- The security situation in eastern DRC remains unstable. Armed groups are present and intercommunal violence can affect the political, security and humanitarian situation. There are continued reports of several towns in eastern DRC being attacked by, or falling under temporary control of, armed groups. There are reports of attacks and kidnappings, including against staff from NGOs and international organisations.
- In the second quarter 2021, due to the intense instability within the eastern part of the country, the DRC President imposed a Martial Law within Ituri and North Kivu provinces which are now under military administration.
- The COVID-19 vaccination rate in the DRC remains very low with only 0.18% in the DRC and 3.8% in Africa being vaccinated. Reluctance is due to fear of the effects of the vaccination and a common belief that COVID-19 does not exist.
- Almost 10% of MMG employees are vaccinated against COVID-19.
- MMG is combating the negativity towards vaccinations on social media and through ongoing internal communication including via a COVID-19 WhatsApp forum and education at team meetings.
- Due to the COVID-19 pandemic, the DRC government has imposed compulsory wearing of masks in public spaces, compulsory airport testing upon arrival into the DRC and a strict curfew from 11pm to 4am with military and police deployed to ensure compliance.
- There were no recordable complaints/grievances in 2021, related to security or human rights at Kinsevere in the reporting year.
- The adoption of the VPSHR is ongoing in the DRC. In 2021, the DRC team continued to focus on the following:
  - » Gap analysis including risk assessments involving representatives from various DRC business functions for a more comprehensive understanding of actions required for robust adoption of the VPSHR.
  - » Completion of Annual VPI Action Plan.
  - » Retraining and refreshing VPSHR knowledge among MMG onsite teams, as well as public and private security forces.
  - » Following updated Human Rights Management Procedure to better align practices to the VPSHR, including MMG standards, work quality requirements and procedures.
  - » An operational Kinsevere human rights working group overseeing governance mechanisms and any potential human rights grievances.

- » Ensuring compliance with the Social Performance Standard and following the updated site-specific Stakeholder Grievance Management procedure.
- » General onsite training on human rights.

### PERU

- In 2021 Peru remains in high political uncertainty that continues to impair the business environment.
- Constant contradiction and corruption scandals added to a slow economic recovery may increase the probability of institutional crisis.
- The existing political challenges are expected to continue in 2022 with the mining sector likely to be pressured by the Executive Branch and social demands.
- In early 2021, Peru was affected by the second wave of the COVID-19 pandemic, hitting a country with a health system deteriorated by the first wave of transmission.
- At the end of June 2021, the mortality index began to decrease notably and has not increased again to date, despite the appearance of variants of global concern such as the Delta and Omicron.
- Peru began national vaccination against COVID-19 in February 2021. As of December 15, 2021, more than 46 million doses have been administered and 71% of the target Peruvian population are vaccinated, with 2.1 million people also receiving the booster.
- The Government is now easing restrictions as fewer COVID-19 cases are detected. Surveillance, prevention and control measures at work including vaccinations, social distancing, mandatory use of masks and air quality guarantee in closed spaces will determine better conditions for economic reactivation.
- During 2021, Las Bambas continued work on increasing understanding and disseminating the VPSHR to all staff involved in security functions, as well as to public and private security forces. In 2021, Las Bambas developed its commitment to the VPSHR by:
  - » Completing an extensive gap analysis and risk assessment involving representatives from various business functions for a more comprehensive understanding of actions required for robust adoption of the VPSHR.
  - » Completing the annual VPI Action Plan.
  - » Following the updated Human Rights Management Procedure to better align practices to the VPSHR, including MMG standards, work quality requirements and procedures.

# C: COUNTRY IMPLEMENTATION CONTINUED

- » Translating all relevant documentation into Spanish.
- » Updating all operational documents and governance mechanisms (for internal and external stakeholders) to include human rights content including the risk management procedure, grievance and complaints procedure, security management plan, environmental plan (water and biodiversity), whistleblower procedure, stakeholder management plan, supply procedures, internal labour regulation and other human resources documents.
- » Human rights risks have been included in Risk Assessments including TSF, water management, unauthorised site access, loss of political and social license to operate, blocking of logistics routes and bribery and corruption.
- » MoUs with all public and private security providers have been reviewed, assuring VPI requirements are included. The MoU with public security contractor was extended in October of 2021, for a period of two years.
- » Activating the regional human rights working group, nominating a key stakeholder to be responsible for its progress and for reporting to head office, with appropriate high-level management sponsorship.
- » Ensuring compliance with the Social Performance Standard and following the updated site-specific Stakeholder Grievance Management procedure.

## AUSTRALIA

Following the formation of the Australian Operations Human Rights Working Group in 2021, the Dugald River and Rosebery sites will commence work on the VPSHR gap analysis, risk assessment and action plans for inclusion in MMG's 2022 VPI Report.

## 10. Engagement with Stakeholders on Country — Implementation

This year the focus continued to be on training the National Police Officers in Peru and training the mine police officers in the DRC as referenced on [page 8 – training](#).

The DRC also committed to informing local leaders and recruiting security forces from local communities, training them in the VPSHR as outlined in the case study below.



## CASE STUDY SECURITY GUARD RECRUITMENT

In Kinsevere we are working with representatives from our local communities to ensure our communities have a role to play in the security of the mine. This year, MMG Kinsevere engaged private local security provider WS Insight to help recruit 120 guards from the surrounding villages of the Kinsevere mine. With the direct participation of local chiefs, the site is working to involve and recruit community members into the MMG security team. The recruitment process proved challenging with some local chiefs nominating candidates for political or relationship reasons; some candidates felt that the recruitment process and skills requirements were too demanding. Through consultations and communication with the local community leaders

and our recruiter WS Insight, the site was able to overcome these challenges, build a shared understanding of the site's recruitment needs and shortlist suitable candidates. To support the development of the local candidates, Kinsevere organised workshops and training to ensure applicants understood the Security and Social Development Management needs on site. The recruitment process allowed Kinsevere to engage with our local community leaders to share the security and management needs on site and build a shared understanding and ownership of security issues moving forward.

For more information on the Security Guard Recruitment process at Kinsevere visit [wemineforprogress.com](http://wemineforprogress.com).

# C: COUNTRY IMPLEMENTATION

## CONTINUED

### 11. VPI Considerations in the Selection of Private Security Providers

MMG's supplier engagement and contract award processes continue to include a comprehensive assessment across a range of criteria including commercial, social, safety, environment, quality and technical capabilities as detailed in MMG's 2020 Full VPI Annual Report.

### 12. Examples of Supporting Outreach, Education and/or Training

Las Bambas is an active participant in the National Society for Mining, Oil and Energy's Human Rights Group and through its involvement supports training and education initiatives.

Further information on security training at both Las Bambas and Kinsevere is provided on [page 8 – training](#), as well as in the [Security Guard Recruitment Case Study on page 12](#).

### 13. Company Procedure to Review Progress on Implementing VPSHR at Local Facilities

Human rights working groups at each site continued to regularly meet and progress their work in 2021.

The working groups support and guide the site as it implements the VPSHR. These working groups consist of representatives from Security, Social Performance, Legal, Human Resources, Supply Chain, Corporate Affairs and SSHE functions, who come together to review and address site-specific issues and advance the VPI Action Plan.

Site-specific policies, procedures and processes are reviewed in conjunction with the gap analysis and risk assessments to develop further actions for improvement.

The working groups meet with MMG head office representatives at least once a quarter to update on progress and gain any additional support required.



Security fence surrounding the Kinsevere mine.

# D LESSONS AND ISSUES



# D: LESSONS AND ISSUES

## 14. Lessons and Issues

COVID-19 continued to present challenges for the implementation of the VPSHR across MMG in 2021, especially as a result of site physical distancing restrictions, remote training requirements and at times reduced availability.

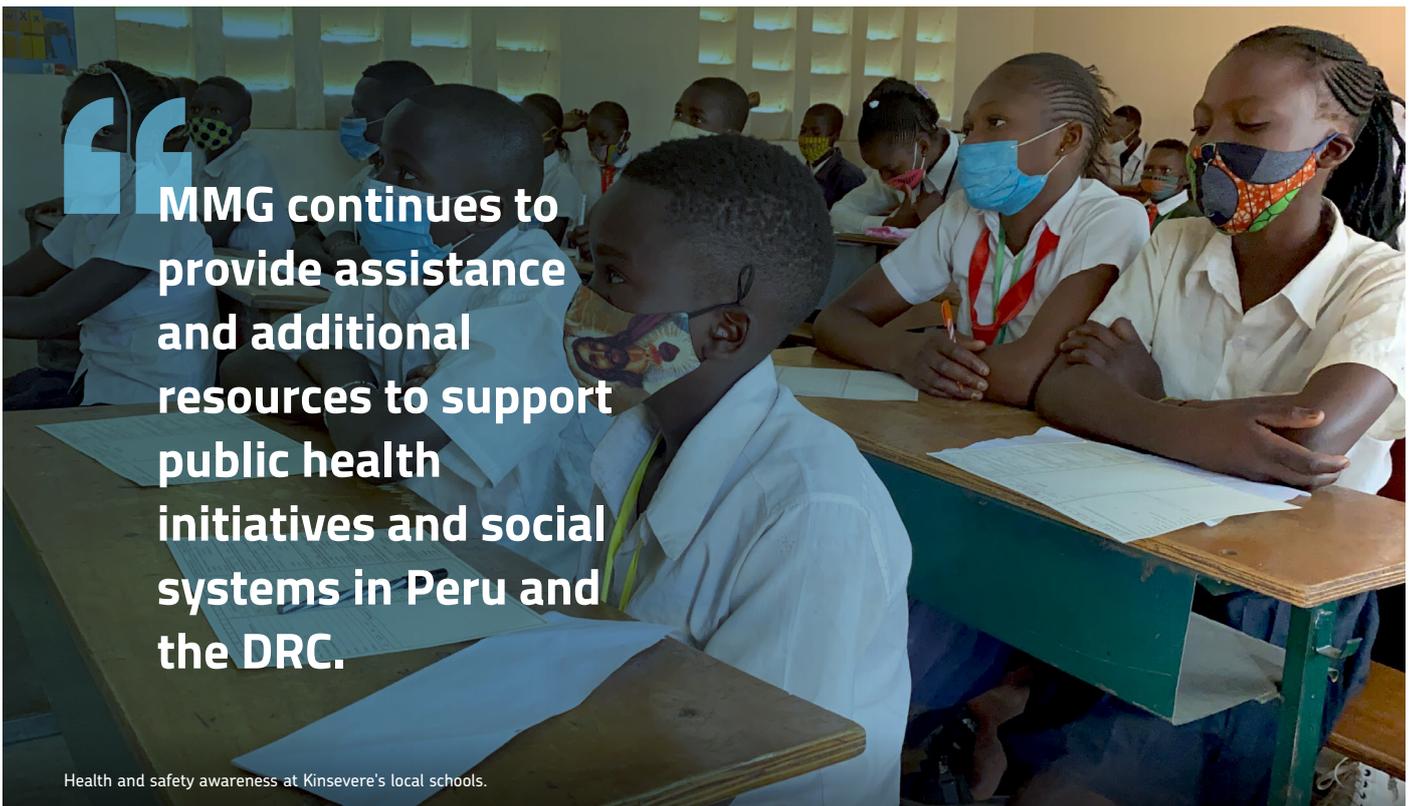
MMG continues to depend on on-line communication with sites, including virtual training. However, for public and private security forces, in person training is most effective, especially in Peru and the DRC. Therefore, as circumstances allow, MMG is resuming this method of instruction.

The pandemic continues to reduce access to public health services, impact livelihoods and put additional strains on host communities. MMG has again provided assistance and additional resources to support public health initiatives and social systems in Peru and the DRC.

Kinsevere faced several challenges in the security recruitment process involving local community youth. This was a pilot program and although ultimately a success in community engagement and security training, key learnings are ongoing as highlighted in the [Security Guard Recruitment Case Study, pg 12](#).

Las Bambas faces constant social and political instability with the election of new leaders for host communities to take place from 2022 for the following two years. This uncertain environment may create new considerations regarding security and human rights that Las Bambas may need to incorporate in their VPI Action Plan.

Gap analysis, risk assessments and action plans were finalised in the second half of 2021. Human rights working groups in each country will work closely with sites in 2022 to implement action plans and determine the levels of head office support required to hit target dates, earlier in the year.



Health and safety awareness at Kinsevere's local schools.

# ENGAGED COUNTRY PROGRESS ON IMPLEMENTATION



# E: ENGAGED COUNTRY PROGRESS ON IMPLEMENTATION

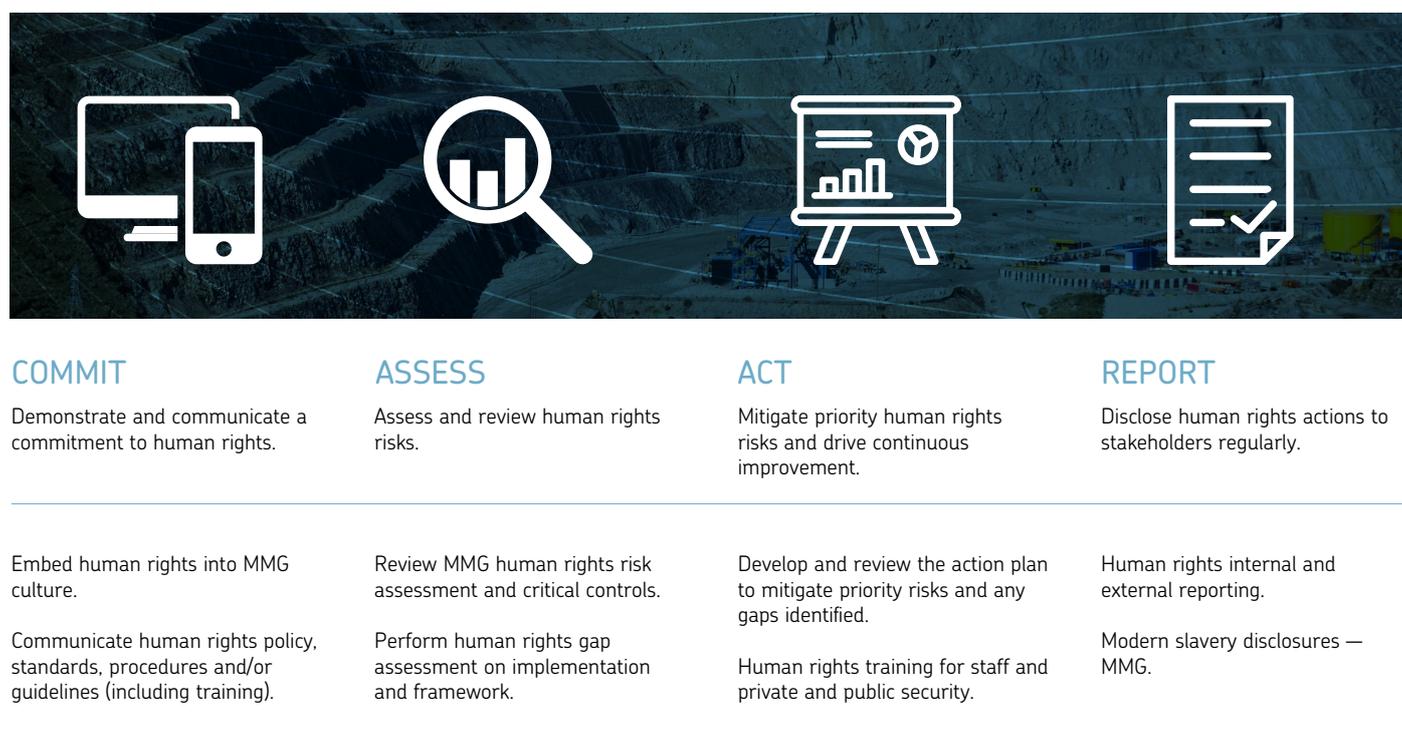
## 15. MMG Progress Report on Roles and Responsibilities of Companies



As mentioned in the [Introduction](#), our operations continued to be impacted by COVID-19. Even so, MMG has made some progress in the implementation of its VPI Action Plan, taking into consideration COVID-19-related travel restrictions and resources.

The MMG Action Plan consists of four pillars shown in Figure 1. A progress update can be found in Table 1. Site based action plans consist of more detailed, specific actions, responsibilities and deadlines.

Figure 1. MMG Action Plan Pillars



**Deliverables:** Commitment and communication, standards, procedures and related activities, training and awareness.

Table 1.

| STATEMENT                    | OBJECTIVES  | KEY PERFORMANCE INDICATORS  | TASKS  | TARGET DATE  |
|------------------------------|---|---|--|--|
| Commitment and communication | MMG is committed to, and communicates, the implementation of the VPSHR. | <ul style="list-style-type: none"> <li>MMG ExCo and Board is aware of, and committed to, the implementation of the VPSHR.</li> <li>MMG has the SSHE Performance Standard and Social Performance Standard that set processes to assist with implementing the VPSHR.</li> </ul> | <ul style="list-style-type: none"> <li>MMG Standards published and communicated throughout the organisation (SSHE Performance Standard, Social Performance Standard).<br/><i>Status: Achieved.</i> Standards that were updated in 2021 include the Code of Conduct.</li> <li>Corporate documentation reviewed and updated to include the VPSHR.<br/><i>Status: In progress.</i> MMG has reviewed and will update the Whistleblower Framework in 2022's first quarter.</li> <li>Site operational documentation reviewed and updated to include human rights requirements.<br/><i>Status: Achieved.</i> Documents updated include risk management procedure, grievance and complaints procedure, security management plan, environmental plan (water &amp; biodiversity), Whistleblower procedure, stakeholder management plan, supply procedures, internal labour regulation and other human resources documents.</li> <li>The VPSHR to be implemented and embedded at a site level by a regional human rights working group.<br/><i>Status: In progress.</i> Human Rights Working Groups are established in Peru and the DRC, embedding the VPSHR. A Human Rights Working Group for the Australian sites – Rosebery and Dugald River was established in 2021 which will become more operational in early 2022.</li> <li>In countries where MMG operates and National Action Plans (NAPs) are in place or under development, MMG has engaged in dialogue on the role of the NAPs in support of the VPI.<br/><i>Status: In progress.</i> In Peru, the teams are involved with the National Society for Mining, Oil and Energy's Human Rights team as well as engaged in dialogue with local level NGOs and local government. The DRC team participates in seminars through the Chamber of Mines.</li> <li>Support the recognition and protection of human rights through social investment, public policy and advocacy.<br/><i>Status: In progress.</i> MMG has again particularly invested in health and food security support, focusing on host communities and those that are vulnerable within those communities, and putting human rights concerns in the centre of its social investment actions in 2021.</li> </ul> | <p>Documentation: Q1 2022</p> <p>Site implementation:</p> <ul style="list-style-type: none"> <li>Peru and DRC sites: Q1 2021 onwards</li> <li>Australian sites: Q2 2022 onwards</li> </ul> <p>(Each region to develop their own action plan)</p> |

| STATEMENT                                     | OBJECTIVES   | KEY PERFORMANCE INDICATORS  | TASKS  | TARGET DATE                                  |
|---|--|---|--|--|
| Standards, procedures, and related activities | Implementation and management of the VPSHR incorporated into MMG's management systems. | <ul style="list-style-type: none"> <li>• There are standards, procedures and/or guidelines to assist with carrying out a Security and Human Rights Risk Assessment.</li> <li>• There are procedures or other requirements for the reporting of security-related human rights allegations against public and private security forces relating to the company's activities.</li> <li>• MMG's standards, procedures and/or guidelines are in place to assist with implementing the VPSHR regarding entering relations with public and private security providers.</li> <li>• MMG has a procedure or mechanism to address human rights incidents by public and private security forces relating to the company's activities.</li> </ul> | <p>Embed and improve the Security and Human Rights Risk Assessment procedure to assess the application of the VPSHR by MMG and its security providers. The procedure identifies security risks, potential for violence, human rights record (public and private security), rule of law, conflict analysis and any equipment transfers.</p> <ul style="list-style-type: none"> <li>• <b>Perform a site-based gap analysis and risk assessments to inform annual VPI Action Plan.</b><br/><i>Status: In progress.</i> Las Bambas and Kinsevere sites completed gap analysis' and risk assessments which informed site-specific Action Plans for 2021. Australian Sites Rosebery and Dugald River will perform a gap analysis to determine Action Plans in 2022's first quarter.</li> <li>• <b>Update Site based Bow Tie Risk Assessments to include human rights risks including TSF, water management, site invasion, loss of political and social license, blocking of logistics routes and anti-corruption.</b><br/><i>Status: In progress.</i> Las Bambas has completed this and Kinsevere will finalise in 2022's second quarter.</li> <li>• <b>Embed and improve procedure for the reporting of security and human rights-related allegations.</b><br/><i>Status: Achieved and ongoing.</i> The procedure for receiving, categorising, managing and remediating grievances from our local stakeholders, including human rights-related grievances was updated in 2021. An external facing Stakeholder Feedback Portal for filing grievances was launched.</li> <li>• <b>The VPSHR are mandatory when entering new relationships with public and private security providers for operations where the VPSHR are relevant.</b><br/><i>Status: Achieved and ongoing.</i> MMG has included such provisions. In the DRC and Peru, security contractors must produce the certificate and/or proof of being a member of the International Code of Conduct for Private Security Service Providers (ICoCPSSP) and fully comply with the VPSHR.</li> <li>• <b>MoUs with private security providers are already 100% in place and other international standards on security and human rights are included in the MoUs as applicable for existing MMG operations. Verification and assurance of implementation and effectiveness is undertaken periodically.</b><br/><i>Status: In progress.</i> MoUs are in place with public security providers in Peru. MMG has progressively improved MoU's with private security providers in the DRC; however not all MoUs are yet in place. For private security in Peru and Australia (when relevant) these provisions have been included.</li> </ul> | In place by December 2021, and then ongoing. |

| STATEMENT              | OBJECTIVES  | KEY PERFORMANCE INDICATORS  | TASKS  | TARGET DATE  |
|------------------------|---|---|--|--|
| Training and awareness | VPSHR and the status of implementation is communicated to all internal and external stakeholders. | <ul style="list-style-type: none"> <li>• MMG actively promotes positive awareness of the VPSHR within the company and at host government level.</li> <li>• The VPSHR and related information, where appropriate, is included in external communications (corporate and site level)</li> </ul> | <ul style="list-style-type: none"> <li>• Levels of awareness promoted globally throughout MMG and with host governments where MMG operates.<br/><i>Status: Achieved and ongoing.</i> In both Peru and the DRC, MMG is engaged in discussion about VPIs at national and local levels. More opportunities for promotion to be determined in 2022.</li> <li>• Promotion of the VPSHR undertaken including presentations, external communications and engagement, membership of, and input to, international associations.<br/><i>Status: Not progressed.</i> Due to COVID-19, MMG will, however, pursue greater international promotion in 2022 as circumstances allow.</li> <li>• MMG to develop and deliver a multifaceted training plan to build the knowledge base, including: a) high-level view of commitment and objectives for Executive and senior management teams; b) ongoing requirements to manage security-related human rights risks, and c). general awareness for key staff.<br/><i>Status: In progress.</i> Social performance, community and security teams received foundational training, and MMG will continue to expand the training in 2022, as well as embed the training into MMG induction process in 2022.</li> <li>• Develop and coordinate delivery of MMG expectations to private security contractors and companies at all higher-risk sites as priority (Kinsevere and Las Bambas).<br/><i>Status: Achieved and ongoing.</i> This has been accomplished by channelling information and training through MMG security functions, from group office to the site level and thereafter to the private security contractors who will be updated regularly.</li> </ul> | <p>Awareness and promotion:<br/>Ongoing 2022</p> <p>Training:</p> <ul style="list-style-type: none"> <li>• Security providers</li> <li>• MMG management</li> <li>• Exposed employees</li> <li>• MMG employees</li> </ul> <p>All Ongoing 2022</p> |

| STATEMENT                | OBJECTIVES  | KEY PERFORMANCE INDICATORS  | TASKS   | TARGET DATE  |
|--------------------------|---|---|---|--|
| Management and assurance | Annual reporting on security and human rights program and activities. | Reports delivered on time and in accordance with the Action Plan. | <ul style="list-style-type: none"> <li>Assign single point accountability at group and country levels.<br/><i>Status: In progress.</i> MMG has a People and Code of Conduct Committee and has expanded its scope to include the VPSHR. At site levels, MMG has assigned a single point of accountability at both Las Bambas and Kinsevere. Australian Sites Rosebery and Dugald River will assign accountabilities in early 2022.</li> <li>The VPSHR Gap Analysis tool to be implemented and exercised annually.<br/><i>Status: In progress.</i> Las Bambas and Kinsevere sites completed Gap Analysis and Risk Assessments which informed site-specific action plans for 2021. Australian Sites Rosebery and Dugald River will implement the VPSHR Gap Analysis tool in early 2022.</li> <li>Annual progress reports to MMG's Board and progress reported in the MMG Annual Sustainability Report.<br/><i>Status: Achieved and ongoing.</i> This reporting began in 2019.</li> <li>Performance indicators for human rights and/or community related grievance resolution monitored by MMG executive committee quarterly.<br/><i>Status: In progress;</i> as of 2022, the following KPI's will be in place               <ul style="list-style-type: none"> <li>Response to any grievance within 7 days of receipt</li> <li>75% of grievances closed within 60 days of receipt</li> <li>15% improvement on previous quarter in average resolution time</li> </ul> </li> </ul> | Ongoing Annually<br><br>Australian Sites – Rosebery and Dugald River to be included in 2022 VPI Annual Report. |

## 16. MMG Use of Voluntary Principles Tools

Similarly to last year, MMG used VPI tools to align its processes and procedures, as well as identify best practices and tailor them to site-specific contexts. For the assessment of its processes, MMG teams have used the VPI's 'Voluntary Principles on Security and Human Rights: Implementation Guidance Tools (IGT),' especially 'Module 2: Risk Assessment' as well as 'Auditing Implementation of Voluntary Principles on Human Rights'. MMG has engaged a third-party auditor in order to understand and improve our level of VP's implementation.

For training, MMG teams have continued to use several resources including: 'Human rights due diligence in conflict-affected settings' and 'Addressing Security and Human Rights Challenges in Complex Environments'. MMG teams are encouraged to visit the **VPI site** to access additional tools and information as required.