

METALKOL SA.

HUMAN RIGHTS STATEMENT OF COMMITMENT

Statement

Respect for human rights is fundamental to Metalkol's sustainability and the sustainability of the communities in which we operate. Our commitment to respecting human rights is derived from our belief that all those affected by our operation – employees, contractors and communities – deserve to be treated with fairness and dignity and is manifested in our support for the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance on Responsible Supply Chains of Minerals (OECD Guidelines). It is further strengthened by our conviction that we can have a positive influence on the lives and livelihoods of our neighbouring communities.

As a company operating as part of the Eurasian Resources Group ("ERG"), Metalkol is bound by the principles laid out in the ERG Human Rights Policy. This Statement is designed to elaborate on those principles and show how our commitments translate into practice within our operation.

Definition

In line with the ERG Policy, our understanding of human rights is guided by internationally-recognised human rights principles, including those contained within the International Bill of Rights (the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights); the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; and the EU Charter on fundamental rights.

Scope

Our commitment applies to all employees (whether permanent, temporary or contract staff) and includes Metalkol senior management. It equally applies to our contractors and other business partners in relation to their activities on our behalf and in so far as we have management control. In cases where our influence is necessarily limited, we will exercise the leverage available to us to encourage compliance with this Statement of Commitment and the ERG Human Rights Policy.

Implementation

Our approach to respecting human rights is shaped by the UNGPs. In seeking to align ourselves with the UNGPs, Metalkol has established a set of management policies, systems and processes in order to identify, prevent, mitigate or, where appropriate, remediate potential adverse human rights impacts resulting from, caused by or linked to our business. These include:

- This Statement providing high-level direction in relation to Metalkol's human rights commitments and responsibilities;
- Active and ongoing communication with internal and external stakeholders around this Statement, including training and awareness-raising;
- Regular and substantive engagement with affected or potentially affected stakeholders, including vulnerable groups, as a primary means of identifying and addressing negative impacts;

- Cross-departmental collaboration in determining, preventing and mitigating salient risks;
- Management coordination and oversight of Metalkol's human rights related activities in the form of a senior-level Human Rights Working Group, which invites key contractors to participate in Working Group meetings and activities;
- Establishment of an effective Grievance Mechanism for both internal and external stakeholders
- A commitment to investigate urgently any credible allegations of human rights abuses and take action as appropriate, including remediation and/or referral to the relevant authorities.

Metalkol believes that our operation can and should have a positive impact on surrounding communities and the environment, as well as the wider DRC. We will continue to develop and expand our efforts to accomplish this in collaboration with all relevant stakeholders. We also recognise that certain issues present particular risks, notably:

- **Security** – Metalkol is determined to provide for the security, health and safety of all those employed by us or working on our site. This commitment extends to ensuring that our security arrangements do not in themselves endanger those living nearby or otherwise threaten the strong relations we are building with neighbouring communities. We seek to align ourselves with the Voluntary Principles on Security and Human Rights (VPSHR) and we provide training to our security employees and contractors in human rights and the Use of Force. Further, MOUs with relevant Public Security Forces that communicate and embed our human rights commitments and expectations are in the process of being signed.
- **Artisanal and Small Scale Mining**- Metalkol operates in a region where artisanal and small scale mining (ASM) is often the only or best source of income for many people. For those engaged in ASM, it can also be a dangerous form of livelihood and one with potentially negative impacts on the environment. Importantly, children are often involved. Beyond our zero tolerance of child or forced labour in our operations or through our supply chain and our commitment to being recognised as a responsible source of copper and cobalt, Metalkol is developing a comprehensive programme of action designed to address the wider problem of ASM.
- **Business relationships** – Metalkol recognises its responsibilities extend to the whole of its operation. In this regard, we are committed to ensuring that our contractors and suppliers also respect the rights of workers and communities. To the extent possible, we will seek to embed human rights requirements in new or renewed contracts with business partners, and include provision for periodic compliance checks against these requirements.
- **Social license to operate** – Metalkol acknowledges the expectations that neighbouring communities have in respect of our potential to support jobs, sustainable livelihoods and wider community development. As part of our comprehensive strategy on social investment, we will look to recruit staff and source products locally as far as possible as well as work in close partnership with communities, regional government and local and international organisations to support sustainable development amongst those communities most affected by our operation.
- **Environment** – Metalkol supports the protection of the environment and the importance of identifying and managing the potential environmental impacts of our activities. We are committed to environmental stewardship and as such will develop an environmental management system and set performance indicators to ensure sustainable environmental practices.

- **Supply Chain and Transportation** – Metalkol is conscious of the risks to both people and the environment of transporting our people and sometimes hazardous materials across long distances, especially in a region where the existing infrastructure is often in poor condition. Metalkol is developing a comprehensive management plan and emergency response procedure to minimise the likelihood and severity of the risks.

Governance

This Statement of Commitment has been developed and approved by Metalkol Senior Management and endorsed by the CEO of ERG. Accountability lies with the Metalkol General Manager.

All reports of alleged human rights infringements will be recorded, assessed and investigated and those found to have violated the principles laid out in this Statement may be subject to disciplinary action, including summary dismissal in the most serious cases. At all times, Metalkol will comply with the applicable laws of the Democratic Republic of Congo (DRC). In situations where there is a discrepancy between domestic laws and human rights commitments, we will endeavour to uphold the highest standard, consistent with the values expressed in this Statement.

We will review this Statement of Commitment periodically to reflect on-going learnings and emerging best practice.

Signed:



Benedikt Sobotka
CEO, Eurasian Resources Group



Gareth Taylor
General Manager, Metalkol SA