



EURASIAN RESOURCES GROUP SARL

HUMAN RIGHTS POLICY

Compliance Policies - Policy 12.1- Human Rights Policy

Originally approved by:	Board of Managers
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Approved by:	Compliance Committee
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Policy owner:	Group Compliance Director
Contact:	Group Compliance Director

This document sets out ERG's Human Rights Policy with which the Group, Perimeters, Regions, Group Companies and their Employees must comply. The Perimeters, Regions and Group Companies may implement stricter rules where necessary to comply with local requirements.

In this document, unless otherwise stated, capitalized terms have the meaning ascribed to them in the section 3 (Definitions) below.

1. Policy Objective

1.1. This Policy's objectives are:

1.1.1. To ensure that the Group complies with law and regulation on human rights;

1.1.2. To provide Employees with clear requirements and universal guidelines on complying with human rights.

1.2. This Policy sets out:

1.2.1. The Group's requirements and standards on aspects of human rights relevant to its operations;

1.2.2. Roles and responsibilities in detecting and preventing abuse of human rights, design of controls and incident reporting.

1.3. This Policy should be read in conjunction with the ERG Code of Conduct and other Company's policies and procedures.

2. Scope

2.1. This Policy applies to:

2.1.1. The Group and its Employees, as well as actual and potential Business Partners;

2.1.2. Any and all the Group's business dealings;

2.1.3. Any and all jurisdictions in which the Group conducts business; and

2.1.4. All actual or suspected human rights incidents involving Employees throughout the Value Chain.

3. Definitions

Board of Managers – means the board of managers of Eurasian Resources Group S.à r.l.

Business Partner – means an individual or body incorporated/unincorporated with which Group Company does business or which performs services for or on behalf of Group Company.

Company – means Eurasian Resources Group S. à r.l.

Compliance Committee – means the compliance committee of the Board of Managers.

Due Diligence – means the process through which enterprises can identify, prevent, mitigate and account for how they address their actual and potential adverse impacts as an integral part of business decision-making and risk management systems.

Employee – means any employee, including but not limited to interns and part-time employees, director, executive or any other officer of any Group Company.

Group or ERG – means all Group Companies together.

Group Company – means the Company or its direct or indirect subsidiary in relation to which the Company exercises control.

Forced or Compulsory labour – means all work or service which is exacted from any person under the threat of penalty and for which the person has not offered himself or herself voluntarily. The term encompasses all situations in which persons are coerced by any means to perform work, and includes both traditional ‘slave-like’ practices and contemporary forms of coercion where labour exploitation is involved, which may include human trafficking and modern slavery.

Governance Body - administrative, management or supervisory body with the highest decision-making authority in the Company, including but not limited to the Board of Managers, the Board of Managers committees and executive committees, etc.

Investigation – means official examination of the allegation about compliance breaches in order to determine whether concerning misconduct have occurred and if so, the person(s) responsible.

Perimeter – means an aggregate of several Regions and/or countries, in which the Group operates, including the international perimeter and the Kazakhstan perimeter.

Policy – means the present document titled “Human Rights Policy”.

Regions – means the regions in which the Group operates, including Africa, Brazil, Kazakhstan region and other regions.

Remedy/Remediation – means counteraction or making good a negative impact or provision of remedy. Examples: apologies, financial or non-financial compensation, prevention of harm through injunctions or guarantees of non-repetition, punitive sanctions (whether criminal or administrative, such as fines), restitution, restoration, rehabilitation.

Social Performance Standards – means standards of responsible business conduct in the social aspect as stipulated in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and other international rules and regulations.



Stakeholders – mean those who can affect or be affected by the Group’s decisions and actions. The Group shall identify its two main groups of stakeholders:

- (a) affected stakeholders: individuals or groups that have interests that are affected or could be affected – positively or negatively – by the Group’s activities and through its Value Chain; and
- (b) users of sustainability reporting: stakeholders with an interest in the Group:
 - i. existing and potential investors, lenders and other creditors (including asset managers, credit institutions, insurance undertakings); and
 - ii. Business Partners, trade unions and social partners, civil society organisations and non-governmental organisations.

Some, but not all, Stakeholders may belong to both groups.

Supply Chain – means the full range of activities or processes carried out by entities upstream from the Group, which provide products or services that are used in the development of the Group’s own products or services. This includes upstream entities with which the Group has a direct (often referred to as a first-tier supplier) or indirect business relationship.

Value Chain – means the full range of activities or processes needed to create a product or service. This includes entities with which the Group has a direct or indirect business relationship, both upstream and downstream of the Value Chain within the framework of its own activities, which either:

- (a) supply products or services that contribute to the Group’s own products or services, or
- (b) receive products or services from the Group.

4. Policy Statement

What we believe:

We define “human rights” to be the basic political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination, as defined in the Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights (1966), the International Covenant on Economic, Social and Cultural Rights (1966), International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work (1998), European Convention on Human Rights and the EU Charter on fundamental rights and other recognized international documents (See Annex 1).

ERG respects and supports the human rights of those impacted by our business, including all Stakeholders, Employees, Business Partners, communities in which we operate and those affected by our operations and Value Chain. Respect for human rights is fundamental to the Company’s sustainability and the sustainability of the communities in which we operate. ERG is working to identify, prevent and mitigate potential adverse human rights impacts resulting from, caused by or linked to our business through implementing the processes recommended by the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the Voluntary Principles on Security and Human Rights.

The Group is a member of the United Nations Global Compact (the “**Compact**”) and has pledged to implement the Compact’s Ten Principles and further embed them within its culture, strategy and day-to-day operations:

- Support and respect the protection of internationally proclaimed human rights;
- Ensure that the Company is not complicit in human rights abuses;
- Uphold the freedom of association and the effective recognition of the right to collective bargaining;



- Eliminate all forms of forced and compulsory labour;
- Eliminate child labour;
- Eliminate discrimination in respect of employment and occupation;
- Support a precautionary approach to environmental challenges;
- Undertake initiatives to promote greater environmental responsibility;
- Encourage the development and diffusion of environmentally friendly technologies;
- Work against corruption in all its forms, including extortion and bribery.

What we do:

Governance and Implementation

This Policy is approved by the applicable Governance Body of ERG and management of Perimeters and Regions is responsible for the implementation of this Policy. This Policy applies to all companies and all Employees within the Group. Through the implementation of our Supplier Code of Conduct and contractual arrangements, we require our suppliers, contractors, consultants and agents and other Business Partners to adhere to this Policy. We will endeavor to work with joint venture partners and non-controlled companies in which we have an interest to adopt this Policy.

We use our engagement with Stakeholders and participation in industry and government initiatives to promote the principles set out in this Policy. ERG works with host governments, which have the primary responsibility for promoting and protecting national and local human rights, to strengthen their capacity.

Integration with laws and regulations and other Company's policies

This Policy is part of the overall management framework governing our commitment to operating in a responsible, ethical and sustainable manner. Inter-related policies include the ERG Code of Conduct, Supplier Code of Conduct and our policies and procedures on employment practices, health, safety, security and environment and anti-bribery and corruption and Group and local grievance mechanisms.

We adhere to applicable laws and regulations wherever we operate, and where our Supplier Code of Conduct and policy commitments exceed local law, we operate in accordance with the higher standard.

Risk Appetite (Tolerance)

ERG respects and upholds human rights as informed by the United Nations Guiding Principles on Business and Human Rights. ERG seeks to avoid causing or contributing to adverse human rights impacts in areas through its own activities (where ERG can directly influence through its conduct to address such risks as they are identified) and/or through its relationships with third parties.

Due Diligence and risk assessments

We undertake Due Diligence and risk assessment activities to identify, prevent and mitigate potential adverse human rights impacts as a result of our operations. We engage with communities and other Stakeholders to ensure that we understand the implications and potential impacts of our activities and incorporate this feedback into our risk assessments and decision making.

Due Diligence and risk assessment are a continuous process and new human rights risks may emerge as part of this process. However, we recognize that the nature of our business requires a focus on salient areas of potential risks and the following focus areas:



Safe and Healthy Work Conditions

Ensuring the health and safety of our people – Employees as well as Business Partners – is a fundamental tenet of our business. In line with our Group Health, Safety and Environment Policy Statement, we are committed to the continuous improvement of all our working environments and to achieving zero harm. ERG strives to provide safe and healthy work conditions and to comply with applicable health and safety laws and regulations.

Abolishing child labour

ERG prohibits the use of child labour and the labour of persons under the legal age for work (young workers). We will work in collaboration with our Business Partners to identify and prevent any instances of child labour.

Eliminating Forced or Compulsory labour and all other forms of slavery

ERG abides by all applicable labour and employment laws of the countries in which it operates. ERG prohibits use of Forced or Compulsory labour both within its operations and in its Supply Chain and Value Chain. We will conduct diligence on and work with our suppliers and Business Partners in order to ensure such practices are not present in our Supply Chain.

Freedom of Association and Collective Bargaining

ERG respects our Employees' rights to the extent granted by applicable law to join, form or refrain from joining a labour union, without any fear of reprisal, intimidation or harassment and to participate in collective bargaining. Where Employees are represented by a legally recognized union, ERG seeks to establish a constructive dialogue with their chosen representatives and to engage in collective bargaining in good faith.

ERG complies with applicable wage, work hours, overtime and benefits laws and regulations of the countries in which it operates and will abide by agreements negotiated with our Employee representatives. ERG aims to provide competitive compensation to Employees, relative to its industry and benchmarked against local market assessments.

Equality, Diversity and Non-discrimination

ERG is committed to workplace equality and diversity and to treating all Employees and Stakeholders fairly and with respect. ERG strives to achieve workplaces which are free from any form of violence, abuse, harassment or discrimination on the basis of race, sex, colour, national or social origin, religion, age, gender, disability, sexual orientation, political opinion or any other status protected by applicable law. ERG upholds equal opportunity for all Employees. Recruitment, hiring, placement, training, compensation and advancement are based on merit, qualifications, performance, skills and experience.

Avoiding involuntary resettlements and respecting the rights of indigenous people

ERG seeks to avoid involuntary resettlements. In situations where this is unavoidable, ERG constructively engages with community representatives and complies with national and regional governmental guidelines and international human rights standards on resettlement and land acquisitions. ERG respects the rights, cultures, heritage and customs of the diverse countries and communities in which ERG operates and respects the rights of indigenous peoples, as defined by applicable national and emerging international standards. ERG endeavors to engage with and consult with communities in a culturally appropriate way to understand the potential implications of its activities and work to optimize benefits and reduce impacts for communities and the wider economy.



Environmental Standards

ERG manages its operations in accordance with national and local environmental laws and regulations. The Group is working towards optimizing the sustainability and minimizing the potentially negative environmental impact of its operations, drawing on emerging best practice.

Communities

ERG acknowledges that its operations may cause an impact on human rights of residents of the affected communities, including indigenous people. To eliminate and/or minimize such impact, ERG is committed to follow Social Performance Standards. ERG commits to undertake environmental and social impact assessment to identify any negative impacts and risks and develop and implement proper mitigation measures.

ERG engages and consults with community Stakeholders to ensure that it is listening to, learning from and taking into account their views in the conduct of our business, including dialogue on human rights issues, receiving feedback and incorporating their views and expectations into decision making. ERG will inform and engage appropriately with affected and potentially affected persons on risks, impacts, remediation and risk prevention and mitigation measures and on-going performance monitoring and to incorporate this feedback into decision making.

ERG is committed to creating sustainable economic opportunity and fostering goodwill in the communities where it operates, through locally relevant and led initiatives. ERG makes significant investments annually in developing local infrastructure and utilities of the communities where it operates, contributing to the establishment and improvement of schools, medical, community and sports facilities and making charitable donations, in accordance with the ERG Code of Conduct and CSR Projects and Sponsorship Policy.

Anti-bribery and corruption

ERG recognizes that corruption hinders business and social development, especially in emerging economies. ERG has a zero-tolerance policy regarding corruption as set out in the Anti-Bribery and Corruption Policy.

Security Arrangements

We will implement the Voluntary Principles on Security and Human Rights (<https://www.voluntaryprinciples.org/the-initiative/>) and international standards in relation to security and the use of force in relation to any engagement with public or private security forces, local communities, governments and other Stakeholders. We will ensure we have proportionate security arrangements in place to ensure the safety of our Employees and Business Partners, whilst respecting human rights. ERG will incorporate relevant contractual clauses in the contracts to ensure security providers act in line with these principles and standards.

Suppliers and third parties

ERG will communicate its human rights commitments and will work with third parties which comply with our human rights commitments and will endeavor them to apply these standards and our Supplier Code of Conduct by specific contractual clauses.

We will implement thorough risk-based diligence and monitoring of our third parties and in higher risk areas of operation or contracts, will implement additional controls including on-going certification, supplier training and audits.

Engagement and Training

All Employees should be given training on this Policy and relevant procedures of Perimeters or Regions. It is an Employee's responsibility to attend such training when it is provided.



Access to Remedy

In the event that we have potentially caused or contributed to adverse human rights impacts, we provide mechanisms that comply with the UN Guiding Principles on Business and Human Rights in relation to the access to Remedy. These mechanisms are in addition to legal remedies and we do not require any waiver of any legal rights to participate in these mechanisms. Where the Group has contributed to adverse human rights impacts, we will take steps to prevent them occurring and provide remediation.

ERG provides a 24-hour confidential Group grievance mechanism for reporting of human rights incidents by its Employees and external Stakeholders via its whistleblowing hotline (ERG Hotline): <https://eurasianresources.lu/en/pages/group-compliance/whistleblowing-hotline>. Site based grievance mechanisms are also in place for higher risk areas and the details are publicized locally, by appropriate mechanisms.

Investigation

All human rights incidents will be recorded, assessed and investigated in accordance with the ERG Code of Conduct and internal procedures, and where substantiated, appropriate remedies will be assessed in accordance with these procedures.

Duly authorized Group's internal investigators shall have the right to enter any Group's premises, be given access to any information requested, and have access to all Employees (with reasonable notice) as part of the Investigation process. The rights of individuals will be respected in an Investigation. To promote continuous improvement, each incident Investigation should end with lessons learnt and practical, appropriate and proportionate recommendations for improvement, with the objective to avoid similar future situations.

Monitoring and Compliance

The policies and procedures of the Perimeters and Regions set out the monitoring systems to apply this Policy at a local level. At a Group level, the Group Chief Legal Officer should, on an annual basis, report on the status of compliance with this Policy to the Compliance Committee.

Group shall arrange for periodical independent review of compliance with this Policy and report any deficiencies and respective recommendations to the Group management and the Compliance Committee.

5. Responsibilities

- 5.1. The Compliance Committee is responsible for establishing this Policy.
- 5.2. The Compliance Department of the respective Perimeter or Region is responsible for:
 - 5.2.1. Providing guidance and advice to the management of the Perimeter or Region with regard to the implementation of this Policy and oversight of the implementation of this Policy;
 - 5.2.2. Monitoring of compliance with this Policy;
 - 5.2.3. Reporting requirement: preparation of periodical reports on the status of implementation and adherence to this Policy.
- 5.3. The management of the respective Perimeter or Region is responsible for effective implementation of this Policy in their respective areas of responsibility and make sure that adequate controls are implemented to ensure on-going compliance as well as ensuring that their Employees are made aware of this Policy.
- 5.4. It is the responsibility of each Employee to comply with the terms of this Policy and to report known or suspected breaches of this Policy within the Group, in accordance with the Group's internal policies.



6. Revision Process

- 6.1. This Policy shall be reviewed periodically (but not less than once every 2 years) and updated where needed to reflect any changes in the relevant law and/or business requirements.
- 6.2. All requests for amendments to this Policy shall be directed to the Policy owner.
- 6.3. Amendments to this Policy must be made in accordance with the internal documents of the Company.

7. Document Version Control

Version	Approved by	Date of approval	Comments
1.0	Board of Managers	13.03.2016	
2.0	Compliance Committee	26.10.2023	

Annex 1. HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS CONVENTIONS (non-exhaustive list)

1. Universal Declaration of Human Rights;
2. International Covenant on Civil and Political Rights;
3. International Covenant on Economic, Social and Cultural Rights;
4. Convention on the Prevention and Punishment of the Crime of Genocide;
5. Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment;
6. International Convention on the Elimination of All Forms of Racial Discrimination;
7. Convention on the Elimination of All Forms of Discrimination Against Women;
8. Convention on the Rights of the Child;
9. Convention on the Rights of Persons with Disabilities;
10. United Nations Declaration on the Rights of Indigenous Peoples;
11. Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities;
12. United Nations Convention against Transnational Organized Crime and the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime;
13. International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
14. International Labour Organization's Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;

The International Labour Organization's core/fundamental conventions:

1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
3. Forced Labour Convention, 1930 (No. 29) and its 2014 Protocol;
4. Abolition of Forced Labour Convention, 1957 (No. 105)
5. Minimum Age Convention, 1973 (No. 138)
6. Worst Forms of Child Labour Convention, 1999 (No. 182)
7. Equal Remuneration Convention, 1951 (No. 100)
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)