

## Human Rights Policy

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### 1. Introduction

The Group recognises and respects fundamental human rights and firmly believes everyone should be treated with dignity, fairness and respect. The Group recognises that preserving and promoting human rights is fundamental to the sustainability of the Group's business and that it has the ability to impact the human rights of its employees, partners, contractors, suppliers and communities both directly through its operations and indirectly through its ongoing relationships.

### 2. Principles and purpose

The Group is committed to safeguarding essential freedoms by supporting the internationally recognised human rights principles set out in the Universal Declaration of Human Rights<sup>1</sup>, the United Nations (UN) Guiding Principles on Business and Human Rights<sup>2</sup> and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work<sup>3</sup>.

Where the implementation of international standards is restricted by, or conflicts with, national law, the Group is committed to seeking ways to encourage the adoption of the highest standards while always upholding the principles of basic human rights consistent with this policy and the Group's Code of Conduct.

### 3. Application of policy

This policy applies to all the Group's stakeholders including its directors, employees, partners, contractors and suppliers.

### 4. Approach and requirements

The Group will achieve its commitment to recognise, respect and promote the human rights of its stakeholders by:

- treating employees (and stakeholders generally) fairly, without harassment or discrimination and by promoting diversity in the workplace;
- respecting the diversity, cultures, customs and values of the people in the communities in which the Group operates;
- respecting the cultural heritage and connection that First Nations Peoples have to land, waters and the environment in which the Group operates and by supporting the UN Declaration on the Rights of Indigenous Peoples<sup>4</sup> and the human rights principles it embodies including the principle of free, prior and informed consent (FPIC);
- not tolerating human rights abuses, including all forms of forced or child labour or servitude and working to ensure such practices are not present in the Group's business or supply chains including without limitation, compliance with requirements (as applicable) of Modern Slavery legislation;
- providing employees and other stakeholders with safe and secure working conditions by embedding the Group's commitments in its internal controls including by operating in accordance with all applicable occupational health and safety laws and regulations;
- consulting with stakeholders on human rights issues and providing an easily accessible complaints mechanism and undertaking action to address grievances in a timely manner;
- requiring key suppliers, contractors and partners to adhere to applicable laws and

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<sup>1</sup> [Universal Declaration of Human Rights](#)

<sup>2</sup> [UN Guiding Principles on Business and Human Rights](#)

<sup>3</sup> [ILO Declaration on Fundamental Principles and Rights to Work](#)

<sup>4</sup> [UN Declaration on the Rights of Indigenous Peoples](#)

standards and by encouraging them to be consistent with ILO core labour principles.

- reporting our management of human rights at a corporate level through annual Sustainability Report.

## 5. Specific Human Rights Risk Matters

The Group commits:

- (a) **(Legislative and regulatory compliance)** to complying with all applicable and relevant legislative and regulatory requirements.
- (b) **(Hazards and Risks)** to:
  - performing assessments to identify Human Rights Risks associated with the Group's activities;
  - implementing control and/or risk mitigation initiatives to reasonably address such risks.
- (c) **(Education and Training)** to continuing Human Rights awareness, education and training programs as well as appropriate remediation initiatives to:
  - minimise the incidence of Human Rights Risks;
  - mitigate the consequences of adverse Human Rights outcomes;
  - build the capability of the Group and its personnel to appropriately address Human Rights Risks and deal with the consequences of such risks.
- (d) **(Reporting)** to encourage the reporting of all relevant Human Rights
  - risks; and
  - incidents,

To relevant Group managerial and/or executive personnel to facilitate the delivery of the aims and objectives of this policy.
- (e) **(Review and Evaluation)** to periodically reviewing and evaluating the Group's Human Rights Risk mitigation arrangements with a view to continuous improvement.
- (f) **(Budgetary Business Planning support)** to appropriate sufficient budgetary and business planning support and resources towards achieving the principles and purpose of this policy.

## 6. Policy Review

This policy will be the subject of periodic review (and as appropriate recommended revision) by management, reporting to the Board via the Board Risk and Sustainability Committee, to ensure the policy at least meets both regulatory and contemporary industry standards and practices, as well as the delivery of the policy's principles and purpose.

## 7. Other relevant policies

Respect for human rights is embedded in other Group policies including:

- Code of Conduct/Values
- Whistleblower Policy
- Diversity Policy
- EESG Policy
- Environmental Policy
- Anti-bribery and Corruption Policy
- Workplace Health and Safety Policy
- Discrimination, Harassment and Bullying Policy