

LUMA AFRICA

HUMAN RIGHTS POLICY

Respect for internationally recognised human rights is an essential part of our ethos at Luma Africa (together with its subsidiaries, the “**Company**”) and we are committed to treating all of our stakeholders fairly and with dignity. We strive to contribute positively to the welfare of the local communities in which we operate by building mutually beneficial relationships while minimising any adverse social and human rights impacts from our activities. This human rights policy (the “**Policy**”) has been adopted for and is intended to act for the benefit of our stakeholders. We consider stakeholders to mean our employees, contractors, suppliers, business partners and the local communities and individuals who live in proximity to our operations or are impacted by our business relationships.

Our approach is informed by international instruments such as the International Bill of Human Rights, the United Nation’s Guiding Principles, the International Labour Organisation’s fundamental principles as well as our membership of the Responsible Minerals Initiative and the policies of the Luma Holding – to where Luma Africa belongs.

The key principles guiding our approach are:

- We value and respect the resources, values, religious beliefs, traditions and cultures of the communities in which we operate, and we recognise the particular importance of upholding the rights of socially marginalised and vulnerable individuals and groups (e.g. women, or indigenous peoples).
- We will commit to and uphold the principle of free, prior and informed consent and supporting the rights of indigenous peoples.
- We recognise, respect and abide by all applicable labour, child labour, modern slavery and employment laws, and we insist that our contractors (and their contractors) meet the same standards. These include prohibitions on child labour, forced labour, discriminatory behaviour, human trafficking and all forms of modern slavery, as well as recognition of the rights of freedom of association and collective bargaining.
- We will uphold the right to freedom of expression, conscience, religion, thought, belief, and opinion.
- We will not permit hate speech and incitement at any of our operations.
- We are committed to ensuring safe working conditions and environments for all employees and contractors.
- We will invest in training and awareness raising amongst our employees, contractors, suppliers on human rights, including this Policy and our expectations and commitments.
- We expect and will insist that human rights are respected by any security personnel operating at our sites through, amongst other things, adherence to the Voluntary Principles on Security and Human Rights. We will strive to increase awareness of those obligations by any contractor security

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personnel and by security personnel of the relevant sovereign State by delivering training on human rights, including the Voluntary Principles

- We will develop metrics to track the adherence to the commitments made in this Policy.
- We will solicit feedback from and engage with stakeholders on human rights related aspects of, and impacts from, our activities.
- We will take steps to identify, prevent and mitigate any potential or actual adverse human rights impacts that we may cause or contribute to through our own activities or which may be directly linked to our operations through our business relationships.
- In the event our operations cause negative human rights impact to stakeholders, we are committed to having in place appropriate grievance mechanisms that allow concerns to be addressed in an accessible, transparent and equitable manner, and we are committed to remedying such negative impacts as are within our control.

We are aware that human rights risks and challenges may change. This Policy (and any internal procedures driven by it) is intended to be organic and evolve in accordance with our knowledge of human rights issues in the communities in which we operate and guided by the policies of the Luma Holding.

We believe in building genuine relationships based on mutual respect and trust within the communities in which we operate and encourage local stakeholders to engage with the relevant nominated contact persons at our sites should they have any questions or concerns, including in respect of any instances of conduct not aligned with the expectations on conduct and performance set forth in this Policy. In the event of any such instances, the Company reserves the right to take any action deemed necessary in line with the expectations and commitments set out in this Policy, up to and including terminating any business relationship.

A whistleblowing hotline has been established to allow such issues to be raised by anyone (for example, community members, employees, contractors, suppliers or business partners) confidentially via the following worldwide call collect/reverse charge number: +250783445300; or email grievance@lumafrica.com

Anonymous submission boxes are also available at each operational site to facilitate the reporting of any concerns. A copy of our Whistleblowing Policy is available on our web page at www.lumafrica.com or may be obtained from the Corporate Secretary.

We will ensure that this Policy is publicly available at each operational site and on the Company's website, accessible to all relevant internal and external stakeholders and reviewed annually by the Company's Board to ensure that it is operating effectively.

Last Approved:

20 May 2022

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