

CENTRAL ASIA METALS

(GROUP, INCLUDING CENTRAL ASIA METALS PLC AND ALL ITS SUBSIDIARIES, BRANCHES, JOINT VENTURES AND ASSOCIATED BUSINESSES)

HUMAN RIGHTS POLICY

Central Asia Metals plc (the “Company”) and its subsidiaries, together (the “Group”) is fully committed to fundamental human rights, as defined in the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work. The Company aims to develop a strong organisational culture which upholds and supports internationally recognised human rights, using the UN Guiding Principles on Business and Human Rights as a guide.

The Group believes that a robust approach to human rights is vital to fulfilling our corporate responsibilities, not only in respect of our employees but for the workers along our supply chains and within the communities in which we operate. Human rights are outlined within our company policies, such as our Code of Conduct found here: <https://www.centralasiametals.com/corporate-governance/company-policies/>, which complement our values and help implement our principles in the workplace.

The following demonstrate how we foster human rights within our business.

- We are committed to providing a stable, secure, and safe working environment for our employees and contractors.
- We value the right of individual expression and prohibit unlawful discrimination as well as discriminatory practices when it comes to recruitment, training, and promotion.
- We support diversity in all forms in our workplace along with freedom of thought, expression, belief, and opinion.
- We treat all our workers with dignity and accordingly, have a zero-tolerance policy to harassment, whether it be physical, verbal, or psychological.
- We look to apply our standards and policies as far as reasonably achievable to suppliers, including any upstream and downstream supply chains, partners, and third-party contractors.



- We ensure that our guiding principles of equal opportunity, treatment, and fair remuneration are adhered to across our operations.
- We abide by working hours laws as well as comply with laws surrounding employee benefits and contractual employment rights.
- We respect and abide by all applicable laws regarding modern slavery, child labour, human trafficking, and involuntary servitude as demonstrated by our Modern Slavery Statement which can be found on our website: <https://www.centralasiametals.com/corporate-governance/modern-slavery-act/> .
- We acknowledge workers' freedom of association and the right for our employees to bargain collectively within prescribed laws, communicating issues to management through designated employee or union representatives.

IMPORTANCE OF STAKEHOLDER AND COMMUNITY ENGAGEMENT

The Company will ensure that there is ongoing engagement with external stakeholders and the surrounding community such that they are fully aware of the lines of communication available to them in the event of a 2 potential human rights issue and that they feel sufficiently empowered that they can raise it with the Company through its grievance mechanisms.

MANAGEMENT OF THE HUMAN RIGHTS POLICY

The Legal Counsel and our Sustainability Director help manage the policy and our senior management plays a paramount role in communicating and overseeing the implementation of the policies on the ground at sites.

The Company is committed to communicating the Human Rights Policy not only to our employees through annual compliance efforts but also to on-site contractors through seminars and more widely to our external stakeholders through the Company website. The Company has committed to including human rights criteria into its due diligence exercises with procurement to assess and manage risks when engaging with suppliers and external parties. Where breaches are identified, measures will be taken to investigate, remedy the relevant adverse impacts, and prevent future offences in line with our standard procedures.



REPORTING OF HUMAN RIGHTS CONCERNS

The Company expects its personnel to not only abide by the ethical business standards highlighted in this policy and within the Code of Conduct, but also to speak up where they become aware of any unethical behaviour both within the company or along its supply chains. This way we can help ensure that we are monitoring potential abuse and reporting them transparently through our Sustainability Report in line with global standards.

In addition to our internal grievance procedures and the Code of Conduct which encourages speaking out by the wider community, we have a Whistle Blowing Policy (<https://wp-centralasiametals-2020.s3.eu-west-2.amazonaws.com/media/2019/06/06095751/Central-Asia-Metals-Plc-Whistleblowing-Policy.pdf>) in place which enables employees and third parties to voice their legitimate concerns through an anonymous, external hotline which operates 24/7 in site-languages.

Through our Whistleblowing Policy management may be duly informed about potential incidents and questionable conduct, including nonadherence to international human rights laws. This allows for concerns to be addressed in a systematic way, providing further assurances of our commitments to human rights.

The Company's Board is ultimately responsible for ensuring adherence to our human rights commitments globally and has been fully informed of and approved the Human Rights Policy.



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