



## Human Rights Policy



**At Kenmare, our actions are informed by our guiding principles: we care, we grow, we excel. We are fully committed to respecting the human rights of all our stakeholders within our sphere of influence.**

Human rights are defined and recognised in international conventions. For the purpose of this policy, a human right shall be one recognised by the International Bill of Human Rights, or as otherwise identified or described in this policy.

We support the International Bill of Human Rights, including the UN Declaration of Human Rights; the International Labour Organisation’s Fundamental Conventions and Declaration on Fundamental Principles and Rights at Work; and Part I, Chapter IV (Human Rights) of the OECD Guidelines for Multinational Enterprises. This policy is intended to supplement all applicable laws, rules, and other corporate policies. It is not intended to supplant any laws.

To this end, Kenmare will:

- Respect the human rights of all individuals impacted by Kenmare’s operations, including our employees and members of our host communities.
- Seek to avoid being complicit in adverse human rights impacts in our relationships with host governments, contractors or third-party service providers.
- Prohibit modern slavery in all its forms. We have zero tolerance for child or forced labour.
- Provide a working environment for our employees, contractors and suppliers that respects their rights and dignity.
- Ensure the safety and well-being of those who work at or visit our operations. We consider the safety and well-being of all employees, contractors and local stakeholders as our top priority. Please see our Health & Safety Policy for more information.

- Respect the rights of people in communities impacted by our activities, including the right to water, land and a safe environment. We will seek to engage with people in such communities to identify potential adverse impacts on human rights and take appropriate steps to avoid, minimise and/or mitigate them.
- Respect the cultures, customs and values of local communities. We implement sustainable community development programmes with effective management, consistent with our Community Engagement and Investment Policy.
- Engage with local communities proactively to discuss and address human rights concerns related to Kenmare’s operations.
- Ensure our security systems, guidelines and practices are consistent with international standards, including the Voluntary Principles on Security and Human Rights (the VPs), and the laws of the jurisdictions where we operate. Compliance with the VPs is written into all Kenmare security contracts or memoranda of understanding with the government and third-party security firms.
- Seek to ensure that our suppliers operate safely and according to the high level of ethical conduct that we expect. Our standard terms and conditions specifically require suppliers to adhere to ILO Standards on child labour, as well as the applicable Kenmare Health & Safety and Environmental policies and procedures.
- Provide formal reporting processes for concerns arising from our operations, including those related to human rights. Kenmare will not tolerate retribution against employees who report suspected human rights violations.
- Monitor and report on a regular basis on Kenmare’s human rights performance and compliance with this policy.
- Kenmare will consider appropriate mechanisms for mitigation and remediation in instances in which it determines that its employees or third parties acting on its behalf have caused adverse human rights impacts. Where violations by employees are proven, Kenmare will implement appropriate sanctions.
- Respect freedom of association, including the right of our employees to form unions. Please see our Freedom of Association Policy for more information.
- Provide a copy of this policy to new employees and provide training on our human rights expectations to all employees. We will also communicate this policy to external stakeholders by making it available on our corporate website.

Kenmare will ensure that all employees understand and adhere to this Human Rights Policy. We will also ensure that third-party service providers (including contractors, suppliers, and business partners) are provided with this policy and we will ask them to adhere to it.

The Human Rights Policy is implemented by the Executive Committee and site leadership. The Sustainability Committee, and more widely the Board of Directors, has responsibility for overseeing Group-wide compliance with the Human Rights Policy.

This policy was reviewed and approved by the Board of Kenmare Resources plc and is signed by Michael Carvill, Managing Director on behalf of the Board of Kenmare Resources plc.

**Michael Carvill**

Managing Director

10 December 2021

**About Kenmare and scope of policy**

Kenmare is an established mining company operating the Moma Titanium Minerals Mine on the north-east coast of Mozambique. This Policy covers the Mine, our Mozambican offices in Nampula and Maputo and our head office in Dublin, Ireland.

We are one of the world's largest producers of mineral sands products, key raw materials ultimately consumed in everyday "quality-of-life" items such as paints, plastics, and ceramic tiles. We mine titanium-rich sands, mainly using dredges that float in artificial ponds, removing 3-5% of ore mined, and separate it into its constituent minerals. We then progressively rehabilitate the mined land before it is handed back to the local community. Once the minerals are separated, we transport our final products to ocean-going vessels from our dedicated port facility.

## Document revision control

Version number	Page number	Change effected	Date of issue
V1.0	All pages	First version	11 March 2020
V1.1	2	Added Signature & company description	25 November 2021
V1.2	3	Amended company description	10 December 2021