




Human Rights Policy

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Approver Name	Approver Title	Signature
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HUMAN RIGHTS POLICY

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HUMAN RIGHTS POLICY

1. POLICY STATEMENT

Human rights are the universal political, civil, economic, labour, social and cultural rights, and freedoms to which all people are entitled, without discrimination. Respect for human rights is core to our company and our approach to human rights is supported by the conviction that our activities can have a positive impact on the lives, livelihoods and rights of individuals and communities.

2. SCOPE

2.1 Purpose:

While governments have the primary duty to protect human rights, we recognize our responsibility to respect human rights by avoiding infringements on the human rights of others, addressing our adverse impacts, and promoting and contributing to broader societal respect for, and protection of, human rights

2.2 Scope:

This Policy applies to Directors, employees, contractors, and suppliers. We will take appropriate action where we identify non-compliance with this Policy by employees or third parties acting on our behalf.

2.3 Responsibility:

The Sustainability Committee of the Board is responsible for review of this policy. Management of Vicuña Co and its subsidiaries are responsible for implementation of this policy.

3. OUR COMMITMENT

We support and respect internationally recognized human rights as proclaimed by the International Bill for Human Rights, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. This means that we seek to operate in alignment with the International Council on Mining and Metals (ICMM) Mining Principles and Position Statements, the United Nations Guiding Principles on Business and Human Rights, and the United Nations Global Compact.

We comply with local laws, and where applicable law differs from the commitments in this Policy, we will comply with applicable laws while seeking to follow the higher standard.

4. OUR APPROACH

We take a rights-based approach in our business activities (including capital projects, operated assets, exploration, closure and post closure) and supply chains aiming to identify, prevent and mitigate risks to people who may be impacted by our operations. We conduct human rights due diligence that focuses on assessing actual and potential impacts, integrating and acting upon the findings, monitoring effectiveness, and communicating how actual and potential salient impacts are addressed. Throughout this process we engage potentially impacted peoples, including human rights defenders and vulnerable groups, to incorporate their voices in our approach.



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We adopt effective mechanisms for reporting (including anonymously) and investigating grievances related to allegations of human rights impacts. Where substantiated, we endeavour to resolve such grievances in an expeditious and fair manner, and we provide or cooperate in providing access to remedy for adverse impacts that we may cause or contribute to through our operations. We do not allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up or cooperating with an investigation.

We communicate this Policy, and provide related training for our employees, contractors and any third parties acting on our behalf. Our Board Sustainability Committee periodically reviews this policy, and performance against this policy, for compliance and continuous improvement. We will report on human rights performance externally in alignment with regulatory obligations, Global Reporting Initiative requirements and other standards that may apply to our Company.

Our integrated approach to human rights is based on the following principles:

- **Labour Conditions:** we uphold the freedom of association, recognize the right to collective bargaining, and are committed to providing a safe and healthy workplace where everyone is treated with dignity and respect. We prohibit the use of any form of forced or compulsory labour (including child labour), and we do not tolerate harassment and discrimination.
- **Host Communities:** we avoid harm to people and communities from our business activities and throughout the mining life cycle. We do not tolerate human rights violations committed by our employees or any third parties acting on our behalf, nor will we be complicit in any human rights abuses or tolerate threats, intimidation, or attacks against groups and individuals.
- **Indigenous Peoples:** we respect the rights, interests, culture and traditions of Indigenous Peoples consistent with the ICMM Mining Principles and Indigenous Peoples Position Statement, and through this, the aims of the United Nations Declaration on the Rights of Indigenous Peoples.
- **Security Providers:** where security services are required as part of operations, we comply with the Voluntary Principles on Security and Human Rights (VPSHR). We require that private security providers comply with the VPSHR, and those we engage must agree in writing to comply with The International Code of Conduct for Private Security Service Providers.
- **Healthy Environment:** we recognise that people depend on the environment in which we live and acknowledge the United Nations General Assembly's recognition of the right to a clean, healthy and sustainable environment as a human right.
- **Supply Chain:** we will undertake risk-based supply chain due diligence focused on modern slavery and other key human rights risks to meet all regulatory obligations.
- **Tailings Facilities:** we require the assessment and management of tailings storage facilities failure risks in a manner that aligns with the Global Industry Standard on Tailings Management.

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