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Review		Date	
Modify		Date	
Approve	Tania Pelsler	Date	30-01-2026

Human Rights Policy

1. Our Position

We, at Metal Concentrators SA (Pty) Ltd ("MetCon"), recognise our responsibility to respect human rights. We believe that our business has a role to play in protecting and promoting human rights within our operations, supply chains, and business relationships.

Respect for human rights underpins how we operate, make decisions, engage with stakeholders, and conduct business within the global precious metals industry.

2. Principles Underpinning This Policy

MetCon is committed to respecting internationally recognised human rights throughout our operations and supply chains.

In line with the UN Guiding Principles on Business and Human Rights, this Policy is based upon:

- The Universal Declaration of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Applicable national legislation
- The Responsible Jewellery Council (RJC) Code of Practices (COP 6 – Human Rights)

We commit to avoiding causing or contributing to adverse human rights impacts and to addressing impacts where they occur.

3. What Human Rights Mean to MetCon

Human rights refer to the basic rights and freedoms that belong to every person, regardless of nationality, gender, ethnicity, religion, social status, or any other characteristic.

For MetCon, respecting human rights means ensuring that any person involved in, or coming into contact with, our operations, supply chains, products, and services is treated with:

- Dignity
- Respect
- Fairness
- Equality
- Integrity

This includes our employees, contractors, suppliers, service providers, customers, and affected stakeholders.

4. Scope and Application

This Policy applies to:

- All MetCon directors, employees, temporary staff, and contractors;
- All operations at SEZ and CPT sites;
- All suppliers, service providers, logistics partners, outsourced contractors, and other business partners;
- All activities within our precious metals supply chain.

Together with our employees and business partners, we are committed to driving the implementation of this Policy throughout our operations and supply chains.

We recognise that human rights challenges may vary by country, sector, or supply chain tier. Where unique risks arise, we will work proactively and in partnership with relevant stakeholders to address those risks appropriately.

5. Employment and Workplace Human Rights Commitments

MetCon is committed to upholding the following labour and workplace standards, aligned with the ILO Conventions and RJC COP provisions relating to labour rights, working conditions and health & safety:

5.1 . Employment is Freely Chosen

We prohibit forced labour, bonded labour, indentured labour, prison labour, human trafficking, and any form of modern slavery.

5.2. Freedom of Association

Employees have the right to freedom of association and collective bargaining, in accordance with applicable law.

5.3 Safe and Hygienic Working Conditions

We provide a safe and healthy workplace in compliance with applicable health and safety legislation and RJC COP requirements.

5.4 No Child Labour

- Child labour is strictly prohibited.
- No person under the legal minimum working age will be employed.
- No person under 18 years of age will be employed in hazardous or night work.
- Where any instance of child labour is identified, appropriate remediation measures will be implemented, including support for access to education where applicable.
- For the purpose of this Policy:
- "Child" refers to any person under 15 years of age, unless national law specifies a higher minimum age, in which case the higher age applies.

5.5 Fair Wages

Wages paid shall meet or exceed national legal requirements and industry standards. Employees shall receive clear information regarding wages and benefits.

5.6 Working Hours

Working hours shall comply with applicable legal requirements and industry

standards. Excessive working hours are not permitted.

5.7 Non-Discrimination

We do not discriminate on the basis of race, ethnicity, nationality, religion, gender, age, disability, sexual orientation, union membership, political affiliation, marital status, or any other legally protected characteristic.

5.8 Regular Employment

We provide regular employment relationships in accordance with national law and do not use labour arrangements to avoid legal obligations.

5.9 No Harsh or Inhumane Treatment

We prohibit physical abuse, threats, harassment, intimidation, degrading treatment, or any other form of inhumane or unethical conduct.

6. Implementation, Due Diligence and Review

MetCon will continuously work to embed this Policy into relevant company processes and procedures to ensure effective implementation.

We recognise that we must identify and address actual and potential adverse human rights impacts that may be directly linked to our operations or indirectly linked through our business relationships.

Accordingly:

- We implement a risk-based human rights due diligence (HRDD) approach integrated into our supply chain due diligence, KYC/KYP processes, and grievance mechanisms.
- We assess risks, act on findings, track mitigation measures, and communicate our efforts as required by RJC COP 6.
- We provide or support legitimate processes to enable remedy where we have caused or contributed to adverse impacts.
- We maintain a grievance mechanism that allows stakeholders to raise concerns confidentially and without fear of retaliation.

Human rights due diligence is an ongoing process. As our risk profile evolves, this Policy will be reviewed and updated as necessary, and at least annually, in accordance with the Document Review Policy.

7. Governance and Accountability

Ultimate accountability for this Policy rests with Senior Management.

Operational oversight is assigned to the RJC Compliance Officer, with material risks escalated to senior management and relevant governance forums.

- Signed: *T Pelsler*
Name: **T Pelsler**
Title: **Compliance Director**
Date of Effect: 30 Jan 2026