

MINEXX SARL HUMAN RIGHTS POLICY

STATEMENT OF COMMITMENT

Recognizing that Artisanal and Small-Scale Mining (ASM) is a socio-economic driver for many communities, our commitment goes beyond mere technical compliance.

We place human dignity, the safety of artisanal miners, and supply chain transparency at the heart of our operational model.

This Policy defines our strict standards to eliminate abuses, protect vulnerable groups, and promote responsible sourcing of transition minerals (Copper, Cobalt, Coltan, Cassiterite, Wolframite, and Gold).

1. PURPOSE

Minexx SARL is committed to respecting, promoting, and protecting human rights throughout all of its activities and mineral supply chain.

This Policy establishes the Company's principles and commitments to ensure responsible sourcing of minerals originating from Conflict-Affected and High-Risk Areas (CAHRAs), in accordance with applicable international standards.

2. SCOPE

This Policy applies to:

- All directors, employees, and representatives of Minexx SARL;
- All suppliers, subcontractors, mineral traders, transporters, and business partners; and
- All mineral sourcing, transportation, processing, and trading activities.

3. REFERENCES

This Policy is based on, among others, the following international standards and legal frameworks:

- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- The United Nations Guiding Principles on Business and Human Rights;
- The International Labour Organization (ILO) Fundamental Conventions;
- The Universal Declaration of Human Rights; and
- Applicable national laws and regulations.

4. MINEXX SARL COMMITMENTS



4.1 Respect for Human Rights

Minexx SARL respects the fundamental rights of all individuals affected by its activities, including employees, local communities, suppliers, subcontractors, and other stakeholders.

4.2 Zero Tolerance for Serious Human Rights Violations

Minexx SARL does not tolerate any direct or indirect involvement in:

- Any form of torture or cruel, inhuman, or degrading treatment;
- Forced or compulsory labor;
- The worst forms of child labor;
- Extrajudicial executions;
- Enforced disappearances;
- Sexual violence or gender-based violence;
- Crimes against humanity or other serious human rights violations.

Where a risk or violation is identified, Minexx SARL shall take appropriate measures, which may include the suspension or termination of the business relationship.

4.3 Prohibition of Support to Illegal Armed Groups

Minexx SARL is committed to providing no direct or indirect support to non-state armed groups or security forces involved in serious human rights violations.

Minexx SARL specifically prohibits any financing, supply, logistical assistance, or any other form of support that could contribute to or fuel conflict.

4.4 Anti-Corruption Commitment

Minexx SARL applies a zero-tolerance approach to:

- Corruption;
- Bribery;
- Extortion;
- Fraud;
- Money laundering; and
- Any other illegal or unethical practices.

All payments and transactions shall be conducted in accordance with applicable laws and internal control procedures.

4.5 Health, Safety, and Working Conditions

Minexx SARL is committed to providing a safe and healthy working environment by:

- Identifying occupational risks;
- Implementing preventive measures;



- Providing appropriate personal protective equipment (PPE); and
- Ensuring regular training for personnel.

The Company respects freedom of association, the right to collective bargaining, and the principles of non-discrimination.

4.6 Community Protection

Minexx SARL is committed to:

- Respecting the rights of local communities;
- Avoiding forced displacement;
- Preventing negative impacts on livelihoods;
- Encouraging dialogue with relevant stakeholders; and
- Promoting relationships based on mutual respect and transparency.

4.7 Environmental Protection

The Company recognizes that the protection of human rights is closely linked to environmental protection.

Minexx SARL is committed to:

- Reducing the environmental impacts of its activities;
- Promoting responsible management of natural resources; and
- Preventing pollution that may affect local communities.

5. DUE DILIGENCE

Minexx SARL implements a due diligence system based on the five-step framework of the OECD Guidance:

1. Establish a strong management system;
2. Identify and assess risks in the supply chain;
3. Design and implement a risk management strategy;
4. Conduct independent audits where required; and
5. Publicly communicate information on due diligence measures and actions taken.

6. GRIEVANCE MECHANISM

Minexx SARL provides employees, suppliers, local communities, and other stakeholders with a confidential, accessible, and non-discriminatory grievance mechanism through which they can report any suspected violations of human rights or breaches of this Policy.

Reports are reviewed in an impartial manner and appropriate corrective actions are taken where necessary.

7. TRAINING AND AWARENESS

Minexx SARL ensures that all relevant personnel receive regular training on:

- Human rights;
- Due diligence;
- Responsible supply chain requirements;
- Corruption prevention; and
- Reporting mechanisms.

8. RESPONSIBILITIES

The General Management of Minexx SARL is responsible for the implementation of this Policy.

All employees and business partners are required to comply with its provisions and report any situation that may constitute a violation of this Policy.

9. MONITORING AND CONTINUOUS IMPROVEMENT

Minexx SARL regularly evaluates the effectiveness of this Policy through:

- Internal assessments;
- Audits;
- Monitoring of incidents; and
- Feedback from stakeholders.

This Policy is reviewed periodically to take into account changes in risks, regulatory requirements, and international best practices.

10. APPROVAL

This Human Rights Policy is approved by the General Management of Minexx SARL and shall enter into force on the date of its signature.

Prepared by	Lucien Bahimba	Approuvé par	Approved by
Role	Head of Responsible Sourcing	Role	General Manager
Date	15 July 2026	Date	30 July 2026
Signature		Signature	