

## LABOUR & HUMAN RIGHTS POLICY

ArrowResources AG (“**ArrowResources**”) and its affiliated companies (collectively the “**Group**”) is active across the energy and metals spectrum, and among other products trades non-ferrous metals, concentrates and ores.

The Group is headquartered in Switzerland but has offices in a number of locations around the globe. The Group’s operations are uniquely office-based, and the Group does not own, nor does it have any shareholdings in, industrial assets or mining and metals production facilities. The Group is an international trading house that effectively finances, stores and transports products purchased from suppliers and sells them to its customers.

### **Our approach to the management of labour & human rights**

This Labour & Human Rights Policy (the “**Policy**”) covers our commitments to labour and human rights and applies to all our employees, directors, officers and contractors directly engaged by the Group that may work at any of our offices or a supplier’s industrial asset from where we source products.

We are committed to upholding human dignity and the associated fundamental freedoms of our employees and external stakeholders. We uphold the protection of human rights by applying:

- The United Nations (UN) Universal Declaration of Human Rights;
- The UN’s Guiding Principles on Business & Human Rights;
- The International Labour Organisation’s (ILO) Declaration on Fundamental Principles & Rights at Work; and
- The Swiss Federal Government’s laws and regulations on labour and human rights, conflict minerals and child labour.

### **Guiding principles on labour & human rights applicable to our suppliers & trading partners**

In addition to the above, and where applicable, we expect our principal suppliers and trading partners to consider and follow the below-listed standards and guidelines to promote and ensure labour and human rights for their operations and activities:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- UN Global Compact Principle on human rights;
- Responsible Minerals Initiative’s (RMI) Responsible Minerals Assurance Process – Environmental, Social & Governance (ESG) Standard for Mineral Supply Chains (Section VII. Social Standards);
- International Council on Mining & Metals (ICMM) – Mining Principles 1. Ethical Business, and 3. Human Rights; and
- International Finance Corporation’s (IFC) Performance Standards 2. Labour & Working Conditions, 5. Land Acquisition & Involuntary Resettlement, 7. Indigenous Peoples, and 8. Cultural Heritage.

Components of the above standards and guidelines are reflected in our Environmental, Social, and Governance (ESG) Policy and our Responsible Sourcing & Supply Chain Standards Policy.

### **Our workplace labour and human rights**

Switzerland is highly ranked in the global Freedom Index (currently no.1) whose ranking criteria include the application of labour and human rights. As the Group is headquartered in Switzerland we comply with the applicable Swiss Federal Government’s laws and guidelines for the management of labour and human rights. This includes, but is not limited to, compliance with laws regarding:

- Discrimination and harassment;
- Working conditions;
- Salary remuneration;
- Working hours paid leave and overtime compensation; and
- Employee benefits – health insurance, pensions and maternity/paternity leave.

### **Our salient human rights risks (“Salient Risks”)**

Salient Risks are directly linked to our supplier and trading partners' performance in the application of human rights as expressed in this Policy. We seek to improve the labour and human rights of our suppliers by ensuring they have appropriate policies, standards and certifications in place, and that they have representative management systems.

In addition to our suppliers holding the relevant policies, standards and certifications, mitigation of these potential risks is further enhanced by our suppliers considering the adoption of the following United Nations Sustainable Development Goals: 1. No Poverty; 2. Zero Hunger; 3. Good Health & well-being; 5. Gender Equality; 8. Decent Work & Economic Growth; 10. Reduced Inequalities; 16. Peace & Justice; and 17. Partnerships for the Goals.

The Group works closely with its principal suppliers to ensure the correct application of human rights standards and obligations in accordance with applicable laws.

### **Policy review**

This Policy is subject to a compulsory periodic evaluation and review for its suitability and effectiveness.

### **Version History**

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<u>Date:</u>	<u>Version:</u>	<u>Issued by:</u>	<u>Description:</u>
05/05/2021	1.0	Compliance Manager	Initial version
23/11/2022	1.1	ESG Manager	Updated version

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**This Labour and Human Rights Policy has been approved by ArrowResources AG’s Board of Directors**