



## **Human Rights Policy**

**Jervois Global Limited ACN 007 626 575**

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## 1. Overview

- 1.1 This Human Rights Policy (Policy) sets out the commitment of Jervois Global Limited ACN 007 626 575 (Jervois or the Company) to human rights and provides a framework to achieve the Group's human rights goals.
- 1.2 Jervois believes in the inherent dignity, equal value, and entitlement of every human being to the same human rights without discrimination. As a company and as individuals, we have a responsibility to develop an organizational culture which effectively respects internationally recognized human rights and seeks to avoid complicity in human rights abuses.
- 1.3 Jervois strives to respect and promote human rights in accordance with the principles contained within the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Core Conventions.
- 1.4 Human rights are woven throughout Jervois' core values and principles, embedded within our Code of Ethics and Business Conduct and are progressively being integrated within our standards, procedures, and practices, including through in-house learning at all levels. We strive to identify, prevent, mitigate and account for how we address human rights risks and impacts in our business and supply chains through our due diligence and management systems.
- 1.5 Jervois recognizes that certain individuals and groups may be more vulnerable to different human rights risks than others. Jervois strives to be aware of and account for situations where women, indigenous peoples, disabled persons, and other groups may be disproportionately impacted or may face more severe challenges in realizing their human rights.
- 1.6 In order to fulfill our human rights commitments, Jervois strives to integrate measures to identify, address and measure our effectiveness in responding to human rights risks in our operations and supply chains within our management and performance monitoring systems.
- 1.7 Jervois strives to ensure alignment with its Code of Ethics and Business Conduct, Sustainability Policy, Whistleblower Policy and related policies, strategies, standards, and procedures. To the extent that any of our subsidiaries or controlled entities have site-specific human rights policies, such policies will be aligned with this Policy.

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## 2. Definitions

- 2.1 In this Policy, unless the context otherwise requires:

**ASX** means ASX Limited (ABN 98 008 624 691) or the financial market conducted by ASX Limited, as the context requires.

**Board** means the board of directors of the Company.

**Diversity** includes, but is not limited to, differences that relate to gender, age, ethnicity, disability, sexual orientation and gender identity, religion, cultural background, personality, marital and family status, carer responsibilities and location.

**Employee** means a person who is an employee or officer of the Group.

**Group** means the Company and its subsidiaries.

**Supplier** means each of the suppliers, vendors, consultants, contractors, and subcontractors (Suppliers) who provide goods and/or services to Jervois Global Limited, including the parent, subsidiaries, and any affiliated entities.

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### 3. Who does this Policy apply to?

- 3.1 This Policy applies to the Company's Board as a whole, to each of the directors and all Employees individually and to all others with whom we have a business relationship, including partners, contractors, consultants, and other suppliers in what they do on our behalf.
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### 4. Benefits of this Policy

- 4.1 The Company has adopted this Policy to acknowledge that respect for human rights is fully in-line with our core values and principles and our commitments to fostering ethical business conduct, including as guided by our Code of Ethics and Business Conduct.
- 4.2 Jervois appreciates that adequate human rights risk assessment, due diligence and remediation plays an important role in fulfilling of commitments to responsible, ethical supply chains and maintaining meaningful and positive relationships with stakeholders, including within our workforce and communities where we operate.
- 4.3 This Policy is specifically designed to assist the Company to reach its strategic goals by taking deliberate action to:
- (a) Continuously improve upon our human rights performance and practices.
  - (b) Advance diversity and create inclusive workplaces.
  - (c) Foster safe, secure workplaces free from acts of discrimination, harassment, intimidation, and other forms of violence.
  - (d) Respect rights to freedom of association and ensure compliance with all laws and terms of collective bargaining agreements including with respect to applicable wages, work hours, overtime, and benefits.
  - (e) Strictly prohibit all forms of modern slavery, including slavery, servitude, forced labour, debt bondage, forced marriage, trafficking in persons, deceptive recruiting for labour or services and the worst forms of child labour.
  - (f) Respect land and water rights and support environmental justice, indigenous peoples' rights and the protection of ecosystems and communities.
  - (g) Respect the cultures, customs, and values of communities where we operate and establish open, honest, and mutually beneficial relationships, including with particular sensitivity to the rights of indigenous people, women, disabled people and marginalized groups.
  - (h) Uphold and promote high ethical standards for all directors, employees, our suppliers and others who are bound by our Code of Ethics and Business Conduct, including with respect to anti-corruption, fair dealing, conflicts of interest and trade restrictions, among others.
  - (i) Meet the Company's obligations under the ASX Corporate Governance Principles and Recommendations and requirements under the Australian *Modern Slavery Act 2018* (Cth).
- 4.4 The Company shall adopt appropriate standards and procedures to ensure human rights are effectively embedded within management and business processes
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### 5. Objectives

- 5.1 The Board will establish Human Rights related measurable targets (**Measurable Objectives**) on an annual basis to identify ways in which human rights can be respected, fulfilled, and measured.
- 5.2 The Measurable Objectives are to include, at a minimum, the Company's objectives for training all management and our workforce on human rights and the occurrence and resolution of human rights related incidents in our business and supply chains.
- 5.3 The Board will assess annually or as otherwise determined the Measurable Objectives and the Group's progress in achieving them.
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## 6. Responsibilities

- 6.1 The Board has responsibility to:
- (a) oversee this Policy and its implementation including the review of its appropriateness and effectiveness;
  - (b) encourage and promote any other initiatives, policies and processes appropriate from time to time to encourage and promote respect for human rights;
  - (c) annually or as otherwise determined set and review the Measurable Objectives;
  - (d) annually or as otherwise determined assess the Company's progress towards achieving the Measurable Objectives; and
  - (e) ensure compliance with the ASX Corporate Governance Principles and Recommendations in respect of human rights.
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## 7. Publication of this Policy and the Company's progress

- 7.1 This Policy will be available on the Company's website and communicated internally.
- 7.2 The Company will provide information its annual report and related disclosures regarding:
- (a) key features of this Policy;
  - (b) the Measurable Objectives and the Company's progress towards achieving them; and
  - (c) human rights risks in our business and supply chains and related strategies to manage them.
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## 8. Employee rights and obligations

- 8.1 This Policy is aspirational and does not form part of an Employee's terms of employment, appointment or engagement with the Group. A departure from the Policy or a failure to establish or meet Measurable Objectives may result in reporting obligations for the Company but is not intended to create direct legal obligations between the Group and Employees.
- 8.2 Any employee with a concern, grievance or suspected violation of this Policy should initially raise the concern with his/her supervisor. Concerns may also be communicated to Human Resources, Operations leadership or via operations-level grievance mechanisms or to General Counsel and our Group-wide whistleblower mechanism ([www.jervoishglobal.com/company/corporate-governance/](http://www.jervoishglobal.com/company/corporate-governance/)).
- 8.3 Jervois will not discharge, demote, suspend, threaten, harass or in any manner discriminate or tolerate discrimination or retaliation against an Employee or director for reporting, in good faith, a violation or potential violation of this policy, and any supervisor intimidating or imposing sanctions on any employee for reporting a matter in good faith will be disciplined.
- 8.5 This Policy is not to be used by the Group, or any Employee, to justify conduct which is contrary to any human rights laws in any jurisdiction including but not related to those concerning labour rights, modern slavery, women's rights, and indigenous peoples' rights.
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## 9. Expectations for other stakeholders

- 9.1 Jervois welcomes any stakeholder to report a grievance, concern or suspected violation of this Policy through our operations-level grievance or through our Group-wide whistleblower mechanism (For more information, see [www.jervoishglobal.com/company/corporate-governance/](http://www.jervoishglobal.com/company/corporate-governance/)). Reports concerning our mineral supply chains and sourcing practices can be lodged at the Responsible Minerals Initiative (RMI) at [www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/grievance-mechanism/](http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/grievance-mechanism/).