

# **GROUP HUMAN RIGHTS POLICY**

### **Document Control and Certification**

Version	2
Date	6 August 2025
Status	In effect
Author	Head of ESG
Department	ESG

### **Version Control**

Date	Revision #	Description of Change	Author
6 August 2025		Whistleblower contact details updated. Format revision	Colleen Parkins

#### **CALEDONIA GROUP HUMAN RIGHTS POLICY**

Caledonia and its subsidiaries are committed to upholding human rights across all aspects of our operations, and ensuring that our employees, contractors and local communities are treated fairly and with dignity. This policy is grounded in international frameworks, including the **Universal Declaration of Human Rights (UDHR)** and the **United Nations Guiding Principles on Business and Human Rights (UNGPs)**, ensuring respect, protection, and remedy in matters related to human rights.

This document outlines our core principles and commitments regarding human rights, addressing the expectations we have of ourselves, our employees, partners, suppliers, and other stakeholders. We aim to contribute positively to the welfare of the local communities in which we operate by building mutually beneficial relationships while minimising any adverse social and human rights impacts from our activities. The following human rights policy has been adopted for and is intended to benefit our stakeholders:

**Respect for local communities:** We value and respect the resources, values, religious beliefs, traditions and cultures of the communities in which we operate, and we recognise the importance of upholding the rights of socially marginalised individuals and groups.

**Non-discrimination and equal opportunity:** We are committed to fostering a workplace free from discrimination based on race, gender, ethnicity, religion, disability, or any other protected characteristic. We promote diversity, inclusion, and equal opportunities in all aspects of employment. We will uphold in our operations the right to freedom of expression, conscience, thought, belief and opinion, and will not permit hate speech or incitement at any of our operations.

**Forced labour, modern slavery, and human trafficking**: We will not engage in or tolerate any form of forced labour, slavery, or human trafficking. We actively monitor our supply chains to ensure compliance with this commitment and will take immediate action if violations are identified.

**Child labour**: We prohibit the use of child labour in any of our operations or supply chains. We support the right of children to be protected from economic exploitation and to enjoy access to education.

**Health and safety**: We are committed to providing a safe and healthy working environment for all employees, contractors, and visitors. We will take all reasonable steps to prevent work-related injuries and illnesses.

**Living wages and fair compensation**: We ensure that all employees receive wages that meet or exceed local legal requirements and allow them to meet their basic needs and those of their dependents. Fair compensation practices are maintained across all locations where we operate.

**Freedom of association**: We respect the rights of employees to freely associate, join unions, and engage in collective bargaining without fear of retaliation or discrimination.

**Security practices**: We expect and will insist that human rights are respected by any security personnel operating at our sites through, amongst other things, compliance with the Voluntary Principles on Security and Human Rights. We will strive to increase awareness of those obligations by any contractor security personnel.

Access to remedy: In the event that our operations cause potential negative human rights impact to stakeholders, we are committed to establishing appropriate grievance mechanisms that allow concerns to be reported and addressed in an accessible, transparent and equitable manner; we recognise and respect stakeholders' right to seek remedy and are committed to remedying such negative impacts as are within our control.

**Grievance mechanisms:** We believe in building genuine relationships based on mutual respect and trust within the communities in which we operate and encourage local stakeholders to engage with the relevant operational personnel at our sites should they have any questions or concerns. A Whistleblowing Policy has been adopted by Caledonia, a copy of which is available at: <a href="https://www.caledoniamining.com/about/corporate-governance/">https://www.caledoniamining.com/about/corporate-governance/</a> and a whistleblowing service has been established to enable reporting of any misconduct or violations of our ethical standards confidentially via the following reporting facilities:

# Whistleblowing service

If you wish to report an incident, please use one of the following reporting channels to make an anonymous or confidential report:

Click the link below:

https://www.whistleblowing.co.za/make-a-report-steps/

- Call Caledonia's unique hotline number 0800 007 139, if you are in South Africa, or +27 31 308 0738, if anywhere other than South Africa.
- Email Whistle Blowers at information@whistleblowing.co.za
- Report via the Whistle Blowers WhatsApp ChatBot on +27 31 308 4664
- SMS 33490 (South Africa only) at a cost of R1.50/SMS and an Information Agent will call you back and save you the cost of a call.

Anonymous submission and suggestion boxes are also available at each mine site to facilitate the reporting of any concerns and employees and contractors are encouraged to report any grievances to employee representatives who are members of a legally constituted workers committee, or directly to a senior management employee.

We will ensure that complaints are handled fairly, transparently and promptly, and will collaborate with external mediation, arbitration or any other grievance resolution mechanism where needed.

**Stakeholder engagement:** We will solicit feedback from and engage with stakeholders on human rights related aspects of, and impacts from, our activities, through our site level grievance procedures.

**Due diligence:** We will identify actual and potential human rights impacts of our business activities, and will take appropriate action to mitigate or prevent adverse impacts. We will develop metrics to track the adherence to the commitments made in this policy.

**Training and awareness:** We will provide training and resources to ensure that employees, contractors, and partners understand our human rights commitments and their responsibilities under this policy. We will ensure that this policy is publicly available at each mine site and on the Caledonia website, accessible to all relevant internal and external stakeholders and reviewed annually by Caledonia's ESG Committee to ensure that it is operating effectively.

We will publicly disclose our efforts to respect human rights, including information on our human rights due diligence processes, identified risks, and actions taken to mitigate those risks.

We are aware that human rights risks and challenges may change. This policy (and any internal procedures driven by it) is intended to be organic and evolve in accordance with our knowledge of human rights issues in the communities in which we operate.

Scope	This policy applies to all employees, operations, subsidiaries, contractors, business partners and activities under Caledonia's control. The policy applies to our business relationships including suppliers, distributors, customers and other stakeholders.
Date of issue	6 August 2025
Review date	1 July 2025
Previous versions	This policy supersedes and replaces Caledonia's Human Rights Policy which was adopted by Caledonia's board of directors on 6 November 2024.
Compiled by	Colleen Parkins
Document owner	Colleen Parkins
Approved by CEO	6 August 2025
Recommended by the Nomination and Corporate Governance Committee for approval by the Board of Directors	5 August 2025
Approved by Board of Directors	6 August 2025