



Kenmare is committed to upholding human rights in accordance with the International Bill of Human Rights, the Universal Declaration of Human Rights; the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

Kenmare will honour this commitment by:

- Establishing and maintaining processes and mechanisms to monitor human rights.
- Respect the human rights of all individuals impacted by Kenmare’s operations, including its employees and members of host communities.
- Avoid being complicit in adverse human rights impacts in Kenmare’s relationships with host governments, contractors, or third-party service providers.
- Prohibit forced or child labour in all its forms both in Kenmare’s own workforce and throughout its supply chain.
- Provide a working environment for employees, contractors, and suppliers where their right to be free from discrimination, experience fair and favourable conditions at work, and privacy are upheld.
- Ensure the safety and well-being of those who work at or visit Kenmare’s operations. Kenmare considers the safety and well-being of all employees, contractors, and local stakeholders as its top priority. Please see the Health and Safety Policy for more information.

- Respect the right of Kenmare employees to have freedom of association and the right to collective bargaining¹ without interference and free from discrimination. See Kenmare’s Employment Policy for more information.
- Respect the rights of people in communities impacted by Kenmare’s activities, including the right to water, land, and a safe environment. Kenmare will seek to engage with people in host communities to identify potential adverse impacts on human rights and take appropriate steps to avoid, minimise and/or mitigate them.
- Respect the cultures, customs, and values of local communities. Kenmare will implement sustainable community development programmes with effective management, consistent with the Stakeholder Engagement Policy.
- Engage with local communities proactively to discuss and address human rights concerns related to Kenmare’s operations.
- Ensure Kenmare’s security systems, guidelines and practices are consistent with international standards, including the Voluntary Principles on Security and Human Rights (the VPs), and the laws of the jurisdictions where Kenmare operates. Compliance with the VPs is written in all Kenmare security contracts or memoranda of understanding with the government and third-party security firms.
- Seek to ensure that Kenmare’s suppliers operate safely and according to the high level of ethical conduct that the Company expects. Kenmare’s standard terms and conditions specifically require suppliers to adhere to ILO Standards on child labour, as well as the applicable Kenmare Health and Safety and Environmental policies and procedures.
- Provide formal reporting processes for concerns arising from Kenmare’s operations, including those related to human rights and commit to resolving grievances. Kenmare will not tolerate retribution against employees who report suspected human rights violations.
- Monitor and report on a regular basis on Kenmare’s human rights performance and compliance with this policy.
- Kenmare will consider appropriate mechanisms for mitigation and remediation in instances in which it determines that its employees or third parties acting on its behalf have caused adverse human rights impacts. Where violations by employees are proven, Kenmare will implement appropriate sanctions.
- Provide a copy of this policy to new employees and provide training on Kenmare’s human rights expectations to all employees. Kenmare will also communicate this policy to external stakeholders by making it available on its corporate website.

Kenmare will ensure that all employees understand and adhere to this Human Rights Policy.

¹ Collective bargaining is reserved for job grades C3 and below. Job grades C4 and above are positions of leadership and therefore do not participate in collective bargaining.

Suppliers are asked to adhere to Kenmare’s Supplier Code of Conduct, which covers the key elements of this policy.

This policy was reviewed and approved by the Board of Kenmare Resources which has responsibility for overseeing Group-wide compliance with the Human Rights Policy. The Executive Committee and site leadership ensures implementation of this policy.

Michael Carvill

Managing Director

25 January 2024

About Kenmare and scope of policy

Kenmare is an established mining company operating the Moma Titanium Minerals Mine on the north-east coast of Mozambique. This Policy covers the Mine, its Mozambican offices in Nampula and Maputo and its head office in Dublin, Ireland.

Kenmare is one of the world's largest producers of mineral sands products, key raw materials ultimately consumed in everyday "quality-of-life" items such as paints, plastics, and ceramic tiles. Kenmare mines titanium-rich sands, mainly using dredges that float in artificial ponds, removing 3-5% of ore mined, and separates it into its constituent minerals. Kenmare then progressively rehabilitates the mined land before it is handed back to the local community. Once the minerals are separated, Kenmare transports its final products to ocean-going vessels from its dedicated port facility.

Document revision control

Version number	Page number	Change effected	Date of issue
V1.0	All pages	First version	11 March 2020
V1.1	2	Added Signature & company description	25 November 2021
V1.2	3	Amended company description	10 December 2021
V2.0	All pages	Second version	25 January 2024