

HUMAN RIGHTS POLICY

1. PURPOSE

- 1.1 Capital Limited (“**Capital**”)’s Human Rights Policy (“**Policy**”) sets out our commitment to respect the human rights of our workforce, affected communities and the rights of all individuals with whom we interact.
- 1.2 This Policy reflects Capital’s intent to set measurable objectives and targets that will drive continual improvement in performance, including measures to avoid causing or contributing to violations of human rights through our activities and operations.
- 1.3 This Policy underpins our *purpose*: to deliver safe, professional and reliable services and solutions to our customers, while providing solid long-term returns to our investors; and reflects our values: **People, Integrity, and Quality**.

2. SCOPE AND APPLICATION

- 2.1 This Policy applies to all Capital activities and representatives, including without limitation:
 - a. directors, employees and any third-party workers, business partners or visitors (collectively, “Responsible Persons”) of Capital’s business and operations; and
 - b. all sites and all business activities, from the exploration phase through to producing mine sites together with laboratories.

3. RESPONSIBILITIES

- 3.1 Our Board of Directors, with guidance from the Sustainability Committee, are responsible for providing the strategic direction for the effective protection of human rights and to review the performance of the Company. The implementation of this Policy is the joint responsibility of the Executive and respective operational-level managers.
- 3.2 The entire leadership group across all levels of the organisation is responsible for creating a culture that upholds the protection of human rights as an integral part of the way we do business.
- 3.3 All Responsible Persons are required to uphold Company values and have a duty of care to:
 - a. Comply with applicable legal requirements, the Company’s policies, management standards and critical hazard controls;
 - b. Report all hazards, risks and incidents; and
 - c. Co-operate with co-workers, supervisors and managers on these matters and identify areas for improvement.

4. POLICY STATEMENT

- 4.1 Capital is committed to:

- a. adopt and implement policies, practices and systems based on the UN Guiding Principles on Business and Human Rights.
- b. seek to ensure that we do not cause, and are not complicit in, human rights abuses either directly or through our business relationships.
- c. expect that our clients, where relevant and applicable, implement the World Gold Council's Conflict-Free Gold Standard to ensure that operations where we operate do not contribute to human rights abuses.
- d. ensure our employees and contractors are treated with respect and are free from discrimination or abusive labour practices.
- e. maintain a Code of Conduct to make clear the standards we expect of our employees, and those with whom we do business, to comply. We will actively promote awareness of our Code and implement systems to monitor and ensure compliance.
- f. oppose all forms of slavery, forced or compulsory labour and child labour, both within our organisation and our supply chain. The standards expected of our suppliers are incorporated into the terms and conditions of contract and detailed in our Supplier Code of Conduct.
- g. manage security-related human rights risks through implementation of the Voluntary Principles on Security and Human Rights.
- h. Enforce zero tolerance for violations of human rights committed by employees, contractors or third parties acting on our behalf.
- i. provide a confidential mechanism as detailed in our Whistleblower Policy, through which employees and others associated with our activities may raise ethical concerns and which will provide protection from retaliation for those who raise concerns in good faith.
- j. regularly review our performance on human rights matters relative to our policies and management standards and implement corrective action plans as appropriate with the aim of continual improvement.
- k. publicly communicate our performance on human rights matters as an integral part of our annual disclosures in the Sustainability section of the Annual Report & Accounts.

5. REVIEW

- 5.1 This Policy will be reviewed and revised annually, to ensure it remains current with business needs. Any changes to the Policy will be presented to the Sustainability Committee for review and the subsequent approval of the Board.
- 5.2 This Policy was approved by the Board on 7 March 2022.

Jamie Boyton
Executive Chairman