

## **SOCIAL RESPONSIBILITY POLICY**

### **1. PURPOSE**

- 1.1 Capital Limited (“the Company”)’s Social Responsibility Policy (“Policy”) sets out our commitment to social responsibility, encompassing land use, community health and safety, cultural heritage, stakeholder engagement, grievance management, and our efforts to create and maintain mutually beneficial and respectful relationships with our host communities.
- 1.2 This Policy reflects our intent to set measurable objectives and targets that will drive continual improvement in social performance, including measures to avoid adverse impacts and enhance opportunities.
- 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, all business activities, from the exploration phase through to producing mine sites together with laboratories.

### **3. RESPONSIBILITIES**

- 3.1 Our Board of Directors, with technical guidance from the Sustainability Committee, are responsible for providing the strategic direction for effective social management 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 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 commits to:**

- a. Maintain a robust social management system for community engagement and relations.
- b. Maintain a robust safety management system to drive continual improvement in the management of workplace hazards, risks, incidents and opportunities.
- c. Comply as a minimum with all applicable legal and regulatory social requirements of the countries in which we operate, and where such legislation or requirements are lacking or absent, apply an internationally recognised standard.
- d. Regularly assess social risks and impacts that exist across the business and implement risk-based mitigation and monitoring programs to improve performance.
- e. Ensure that social impact assessments undertaken by clients are accessible to affected communities and include plans to avoid, minimize, mitigate or compensate for significant adverse impacts.
- f. Listen to and engage with stakeholders in order to understand better their interests and concerns and integrate this knowledge into how we do business.
- g. Establish fair and effective mechanisms through which complaints and grievances related to our activities can be raised, resolved and remedies implemented. We will put in place a grievance procedure at all operations and ensure they work hand in hand with the procedure of our clients at the operations.
- h. Identify and eliminate or minimise significant risks to the health and safety of local people as a result of our activities. We will develop, maintain and test emergency response plans, ensuring communication to, and involvement of, potentially affected stakeholders.
- i. Respect the human rights of our workforce, affected communities and all those people with whom we interact. Our commitments on human rights are detailed in our Human Rights Policy.
- j. Co-operate with clients to consult regularly, in good faith and in a culturally appropriate manner with communities associated with our operations on matters of interest to them and will take account of their perspectives and concerns. We will be alert to the risk of differential negative impacts to vulnerable or marginalized groups.
- k. In conjunction with our clients' mine sites, ensure that the communities associated with the operations are offered meaningful opportunities to benefit from our presence, including through access to jobs and training, procurement opportunities for local business and social investment.
- l. Seek to obtain and sustain the broad-based support of communities affected by our activities through informed consultation and participation.
- m. In conjunction with our clients, respect the individual and collective rights and interests of Indigenous Peoples.
- n. Seek to preserve cultural heritage from adverse impacts associated with project activities. We will support our clients to adopt the management measures approved

in the social impact assessments/environmental and social management plan.

- o. Seek commitment from our clients to avoid involuntary resettlement.
- p. Regularly review our social performance relative to our policies and management standards and implement corrective action plans as appropriate with the aim of continual improvement.
- q. Be guided by ISO 26000 Social Responsibility and ISO 27000 Information Security.
- r. Publicly communicate our social performance as an integral part of our annual sustainability disclosures in the Sustainability section of the Annual Report & Accounts.

## **5. EVALUATION**

- 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