

# Human Rights Policy

Last updated: February 2024

## Our Commitment

Australian Strategic Materials (**ASM**) commits to:

- respecting the internationally recognised human rights of all people;
- respecting the internationally recognised human rights of Indigenous Peoples;
- respecting the labour rights of workers in our supply chains, including in relation to non-discrimination, freedom of association, freedom from modern slavery, collective bargaining and work hours;
- protecting the health and safety of all our workers;
- respecting the livelihoods and health of communities in which we operate;
- managing and reducing our environmental impacts of our operations; and
- ensuring effective grievance mechanisms and due diligence processes.

We strive to act as a responsible corporate citizen in all our interactions. We comply with all applicable laws and regulations, and we aim to adhere to the relevant international standards and best practices on human rights.

## How We Implement Our Commitments

Commitment	Implementation Methods
Human Rights	<ul style="list-style-type: none"> <li>• Undertaking our activities in line with the guidance set out in:               <ul style="list-style-type: none"> <li>○ the United Nations Universal Declaration of Human Rights;</li> <li>○ the United Nations Guiding Principles on Business and Human Rights;</li> <li>○ the Voluntary Principles on Security and Human Rights; and</li> <li>○ the International Council on Mining and Metals Indigenous Peoples and Mining.</li> </ul> </li> <li>• Requiring staff, contractors and suppliers to abide by the ASM Code of Conduct.</li> <li>• Fostering a culture of corporate compliance, ethical behaviour, and good corporate governance, which reflects our values of excellence, care, integrity and team.</li> <li>• Communicating this Policy to staff, contractors and suppliers.</li> <li>• Tracking the effectiveness of this Policy, continually improving our approach and reporting on progress.</li> </ul>

	<ul style="list-style-type: none"> <li>• Seeking to participate in programs which aim to preserve human rights.</li> </ul>
Rights of Indigenous Peoples	<ul style="list-style-type: none"> <li>• Undertaking our activities in line with ASM's Indigenous Peoples Policy Statement.</li> <li>• Respecting, engaging and partnering with Indigenous Peoples, by listening to Indigenous voices and perspectives, and working collaboratively with Indigenous stakeholders and partners.</li> </ul>
Labour Rights	<ul style="list-style-type: none"> <li>• Undertaking our activities in line with the guidance set out in the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.</li> <li>• Working towards: <ul style="list-style-type: none"> <li>○ eliminating all forms of forced or compulsory labour, child labour and human trafficking in our operations or supply chain; and</li> <li>○ eliminating discrimination in respect of employment and occupation.</li> </ul> </li> <li>• Recognising and respecting the rights of employees and contractors to freedom of association and the right to collective bargaining.</li> <li>• Providing fair and equal opportunities for employment and advancement.</li> <li>• Prohibiting any discrimination or harassment based on race, ethnicity, gender identity, sexual orientation, intersex status, physical or mental disability, mental illness, religion, political opinion, pregnancy, breastfeeding or family responsibilities.</li> <li>• Having a zero-tolerance approach towards harassment or bullying of any kind, or discrimination based on personal attributes unrelated to job performance.</li> <li>• Ensuring that our employees and contractors are paid at least the minimum wage required by law, and that they work reasonable hours in compliance with applicable laws and standards.</li> <li>• Conducting due diligence and risk assessments as appropriate and reporting in accordance with applicable modern slavery laws.</li> <li>• Supporting and encouraging people to 'Speak Up' and report complaints or concerns (ASM's Speak Up Policy is available on the ASM website (asm-au.com)).</li> </ul>
Health and Safety	<ul style="list-style-type: none"> <li>• Providing employees and contractors with safe and healthy working conditions, adequate training and appropriate personal protective equipment.</li> <li>• Providing employees with access to wellbeing programs.</li> </ul>
Community Engagement	<ul style="list-style-type: none"> <li>• Taking a rights-based approach to the way we partner with the communities where we operate.</li> <li>• Engaging and consulting with communities and listening to concerns they have with our operations.</li> <li>• Taking community views and concerns into account in our decision-making processes and providing access to effective grievance mechanisms and remedies for any adverse human rights impacts that we cause or contribute to.</li> </ul>

	<ul style="list-style-type: none"> <li>Supporting the development and well-being of the local communities through our social investment programs and initiatives.</li> </ul>
Environment	<ul style="list-style-type: none"> <li>Seeking to sustainably process and produce rare earths, critical minerals and high-tech metals.</li> <li>Committing to evaluating, assessing, and managing both physical (catastrophic and natural disaster events) and transition (low carbon economy) risks of climate change.</li> <li>Striving to conserve biodiversity and natural resources, including water.</li> <li>Working to prevent pollution and reducing emissions and effluents.</li> <li>Focusing on innovative design, management systems and processes, and continuous improvement practices to reduce, reuse, or recycle waste.</li> <li>Applying the mitigation hierarchy during project planning, and where impacts are unavoidable, rehabilitate the environment where we have been operating.</li> </ul>
Grievance Mechanisms and Remediation	<ul style="list-style-type: none"> <li>ASM's Speak Up Policy and Standard sets out how people are protected when making disclosures or reporting issues. The Speak Up Policy and Standard apply to staff, contractors, suppliers, customers, or any other concerned party. ASM will assess and where necessary investigate matters which are reported, by following a fair process.</li> <li>ASM will not allow any form of retaliation, discrimination, harassment, or intimidation against anyone who decides to Speak Up under this Policy, or on any other occasion when they feel it is necessary.</li> <li>Any negative human rights impacts will be remedied in line with this Policy.</li> </ul>
Determining Impacts through Due Diligence	<ul style="list-style-type: none"> <li>Conducting due diligence over our own operations to determine the human rights impacts of our activities. The findings from our due diligence will be integrated into our material risk framework.</li> <li>Conducting due diligence and screening on our suppliers and customers to ensure that they do not engage in any human rights violations or abuses.</li> <li>Including human rights clauses in our contracts and agreements, and we monitor and audit their performance and compliance.</li> <li>Terminating our relationship with any supplier or customer that fails to meet our human rights expectations or requirements.</li> </ul>

## Responsibility for Human Rights and this Policy

ASM respects the rights of our employees, contractors, suppliers, and customers and in turn expects each stakeholder to uphold the same standard of human rights we do and to adhere to this Policy.

ASM's Board oversees our approach to human rights and is responsible for this Policy. We have established a governance structure to oversee and implement this Policy and our human rights commitments. We monitor and evaluate our human rights performance and impacts, and we seek feedback and input from our stakeholders.

We disclose our human rights policies and programmes, on our website and we communicate our human rights performance and impacts in our annual reports and sustainability reports and to staff, contractors and suppliers.

Internal Use Only

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