

## INTRODUCTION

Human rights are the basic rights and freedoms to which all people are entitled, without discrimination. The World Benchmarking Alliance identified the extractives industry as one of the sectors with high risk for negative human rights impacts in a review of more than 2,000 publicly and private listed companies. Impacts presented in the form of reduced access to natural resources such as water, abuses by unaccountable security forces, and deficiencies in health and safety.

At West African Resources (WAF), we respect human dignity in all we do, and we value diversity in our workplaces. We do not discriminate against people based on their ethnicity, nationality, religion, gender, age, disability or any other bias. We do not and will not use child, forced or compulsory labour in our operations and will not tolerate it in our business relationships.

## SCOPE

This policy applies to all employees of the WAF group of companies and persons working for WAF under a contract or a consultancy agreement.

## OUR COMMITMENT

West African Resources is committed to respecting human rights in all areas of our operations. This includes:

- Providing employees with all necessary information on their terms of employment.
- Treating all employees fairly and providing them with equal opportunities.
- Protecting the rights of freedom of association and collective bargaining.
- Providing workplace health and safety conditions for employees and workers.
- Rejecting any form of slavery in our operations and supply chain, including forced, bonded, or child labour.
- Requiring that relevant personnel receive appropriate human rights and cultural sensitivity training.
- Promoting inclusion, mutual respect, diversity, and rejecting harassment or other forms of discrimination.
- Providing access to a grievance management process and enabling access to judicial or non-judicial remedies.
- Respecting the culture and heritage of local communities and their connection with natural resources.
- Recognising and respecting the rights of indigenous peoples.
- Undertaking due diligence to identify, prevent and mitigate adverse human rights impacts.
- Taking action to remedy any adverse human rights impacts that WAF may have caused or contributed to; and
- Recognising the rights of human rights defenders to act with freedom from threats, intimidation, violence, punitive action, surveillance or physical or legal attacks.

Our activities comply with applicable laws and regulations of the countries in which we operate. WAF's internal policies and standards also take guidance from international standards, including:

- **International Bill of Human Rights**, including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights.
- International Labour Organisation (ILO) **Declaration on Fundamental Principles and Rights at Work**, promotes four key principles: freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in respect of employment and occupation.

- United Nations **Guiding Principles on Business and Human Rights**, which addresses respect for human rights in the context of transnational companies.
- **UN Declaration on the Rights of Indigenous Peoples**, provides a framework for efforts to advance the rights of indigenous people around the world; and
- **Voluntary Principles on Security and Human Rights**, which guide companies in conducting a comprehensive human rights risk assessment for their engagement with public and private security providers to ensure human rights are respected.

## IMPLEMENTATION

WAF integrates human rights into all aspects of our operations, including:

- Assessing human rights risk and its management in WAF's broader risk management framework from early stages of project development and new acquisitions through to closure planning. Risk management is overseen by the Board of Director's Risk Committee, chaired by the Independent Lead Director and with direct input from the General Managers of Risk and Sustainability, and the Chief Financial Officer.
- Incorporating human rights into company policies (Code of Conduct, People Policy, Diversity in Employment Policy, Supply Chain Policy).
- Committing to adhering to the Voluntary Principles on Security and Human Rights in WAF's Security Management System and providing comprehensive training for security personnel on how to apply the principles.
- Assessing and reporting human rights risks under the Australian Modern Slavery Act 2018.
- Implementing a Modern Slavery Risk Questionnaire for contractors.
- Adopting stakeholder engagement processes and social investment programming that are inclusive of vulnerable people and minority groups.
- Reporting on the Company's environmental, social and governance performance in the annual Sustainability Report.
- Supporting the UN's Sustainable Development Goals through our social investment program.

This policy has been approved by the Board and will be reviewed every two years. The Executive Chairman and CEO is responsible for ensuring it is implemented throughout the organisation. The policy will be communicated to employees, contractors and suppliers and made publicly available at [www.westafricanresources.com](http://www.westafricanresources.com).

## SPEAKING UP

West African Resources is committed to conducting its business with honesty and integrity, and we expect all employees to maintain the same high standards. A culture of openness and accountability is essential to prevent situations where human rights are jeopardised and to address them if they occur. WAF's **Whistleblower Policy** sets out avenues for reporting concerns internally to the Company's Whistleblower Officer maintaining confidentiality. In the event the reporting person is not comfortable reporting to the internal Whistleblower Officer, the Whistleblower Policy provides alternative means for reporting. External reporting to maintain anonymity and confidentiality is also available through WAF's Independent External Audit Partner.

**REFERENCES**

Australian Government (2018). Modern Slavery Act 2018.

International Labour Organization (1998). Declaration on Fundamental Principles and Rights at Work.

United Nations (1948). Universal Declaration of Human Rights.

United Nations (2007). Declaration on the Rights of Indigenous Peoples

United Nations (2011). Guiding Principles on Business and Human Rights.

Voluntary Principles on Security and Human Rights (<https://www.voluntaryprinciples.org/>)

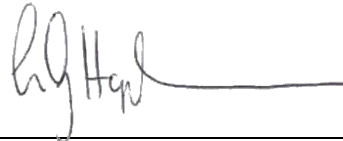
World Benchmarking Alliance (2021). Corporate Human Rights Benchmark Methodology: Extractives Sector.

Yours sincerely,



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