

1. 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.¹ The review identified impacts 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 Limited (**WAF**), we aim to respect human dignity in all we do, and to 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. This commitment is held without regard to location or function.

2. SCOPE

This Human Rights Policy has been approved by the board of directors of WAF (**Board**) and applies to WAF and its controlled subsidiaries, including their employees and officers and persons working for them under a contract or a consultancy agreement. These persons are collectively referred to in this policy as **our people**.

References in this Policy to **we**, **our** or the **Group** include WAF and its controlled subsidiaries.

3. OUR COMMITMENT

We are committed to respecting internationally recognised human rights, as articulated by the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work, 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 expression, association and collective bargaining.
- Providing workplace health and safety conditions for our people.
- Rejecting any form of slavery in our operations and supply chain, including human trafficking, forced, bonded, or child labour and we expect that our business partners will also uphold the same standards.
- Ensuring that our people are aware of their individual responsibilities and increasing awareness and knowledge through appropriate human rights and cultural sensitivity training tools and access to resources.
- Promoting inclusion, mutual respect, diversity, and rejecting harassment or other forms of discrimination.
- Providing access to fair, effective, accessible and timely grievance management processes and enabling access to judicial or non-judicial remedies.
- Respecting the interests, rights, values, livelihoods and cultures of the communities in which we operate and their connection with natural resources.
- Recognising and respecting the rights of Indigenous Peoples and committing to uphold the principle of Free, Prior and Informed Consent (FPIC).

¹ World Benchmarking Alliance. (2021). CHRB Methodology: Extractives Sector. [World Benchmarking Alliance](#)

- Undertaking due diligence to identify, prevent and mitigate adverse human rights impacts in our operations and supply chain.
- Taking action to remedy any adverse human rights impacts that the Group may have caused or contributed to.
- Recognising the rights of human rights defenders to act with freedom from threats, intimidation, violence, punitive action, surveillance or physical or legal attacks.
- Avoiding involvement in unlawful armed conflict, human rights violations, or breaches of international humanitarian law, whether by causing, supporting or contributing to them.
- Ensuring resettlement activities associated with our operations are conducted in a fair and respectful manner that addresses the needs and interests of affected communities.

Our activities comply with applicable laws and regulations of the countries in which we operate. The Group's policies and standards 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**, which 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**, which provides a framework for efforts to advance the rights of indigenous people around the world.
- **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.

4. IMPLEMENTATION

WAF's CEO is responsible for ensuring this policy is implemented throughout our organisation.

We integrate human rights into all aspects of our operations by:

- Assessing human rights risk and its management in our broader risk management framework from early stages of project development and new acquisitions through to closure planning. Risk management is overseen by the Board's Risk Committee, chaired by WAF's Lead Independent Director and with direct input from our General Managers of Risk and Sustainability, and Chief Financial Officer.
- Incorporating human rights into our policies, including our Code of Conduct.
- Committing to abiding by the Voluntary Principles on Security and Human Rights in our 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* (Cth).
- Implementing a Modern Slavery Risk Questionnaire for our suppliers.
- Adopting stakeholder engagement processes and social investment programs that are inclusive of vulnerable people and minority groups.

- Communicating this policy to our people, suppliers and others with whom we do business and making it available to the public through its publication on WAF's website.
- Reporting on our environmental, social and governance performance in WAF's annual Sustainability Report.
- Supporting the UN's Sustainable Development Goals through our social investment programs.

5. SPEAKING UP

We are committed to conducting our business with honesty and integrity, and we expect our people and those with whom we do business 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.

We have adopted grievance mechanisms which set out a process for our people to report grievances, including non-compliance with our policies. We have also adopted a **Whistleblower Policy** that sets out avenues for reporting concerns related to our organisation either to a nominated person internal to our organisation or a nominated person external to our organisation if the reporting person is not comfortable reporting to our internal contact. In accordance with our grievance mechanisms and Whistleblower Policy, we take steps to protect the confidentiality of whistleblower reports.

6. REVIEW AND PUBLICATION

This policy will be reviewed and may be updated periodically by the Board.

The current version of the policy will be communicated to our people, suppliers and others with whom we do business and made publicly available at www.westafricanresources.com.

7. REFERENCES

Australian Government (2018). *Modern Slavery Act 2018* (Cth).

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.