

Human Rights Policy

1. Purpose and Scope

The Human Rights Policy outlines The Perth Mint's commitment to undertaking responsible business practices and incorporates the principles set out in the United Nations Declaration of Human Rights and the Guiding Principles on Business and Human Rights, and other international best practice standards. Incorporating these human rights standards in all aspects of our work processes and in the way we conduct our business operations remains a key focus.

This policy will capture:

- what human rights standards The Perth Mint is committed to complying with;
- what human rights we consider are particularly relevant to our business and the industry we operate in;
- how we will comply with these human rights standards and seek to influence our Suppliers to comply; and
- how we intend to implement, monitor, and review this policy.

2. Our Commitment

The Perth Mint acknowledges the potential for precious metals operations to have an adverse impact on the human rights of various stakeholders. In view of this, we are committed to:

- respecting, promoting, and protecting all human rights;
- advancing respect for human rights in our business relations; and
- ensuring we work in conjunction with our stakeholders to recognise and understand the impacts of our business operations and take appropriate mitigating measures.

Our commitment to implementing this policy is based on upholding and respecting those human rights set out in the *United Nations Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights with its two Optional Protocols*, the

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*International Covenant on Economic Social and Cultural Rights*¹ and the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work*.²

In addition, The Perth Mint is also committed to upholding *The Voluntary Principles on Security and Human Rights* and *ILO-IOE Child Labour Guidance Tool for Business*.

The compliance with these internationally recognised human rights standards aligns with our values; Responsibility, Integrity, Safety and Excellence which regulate our behaviours and attitudes across all levels of our organisation and business operations.

We take the responsibility of communicating this policy and the applicable standards to our customers and suppliers. We do not tolerate or condone any conduct that is inconsistent with this policy and appropriate actions will be taken if any of these standards are breached.

This policy is publicly available and will be updated periodically to ensure it meets or exceeds any human rights standards set by our accrediting exchanges.³

3. Who This Policy Applies To

In line with the UN Guiding Principles,⁴ this policy applies to our employees, those who conduct business on our behalf and our Direct Suppliers. We require all Direct Suppliers to comply with this policy as part of their engagement with us. We also expect that all Suppliers act consistently with their human rights obligations and endeavour to promote human rights in all their own business relationships, including downstream suppliers.

This policy should be read in conjunction with the following policies:

¹ UN General Assembly, *International Bill of Human Rights*, (adopted 10 December 1948), available at <https://www.ohchr.org/sites/default/files/Documents/Publications/Compilation1.1en.pdf> (accessed 14 September 2021).

² International Labour Organization (ILO), *ILO Declaration on Fundamental Principles and Rights*, (adopted 18 June 1998) available at <https://www.ilo.org/declaration/lang--en/index.htm> (accessed 14 September 2021).

³ The Perth Mint is accredited by the London Bullion Market Association, the New York Commodity Exchange, the Shanghai Gold Exchange, the Tokyo Commodity Exchange, and the Dubai Multi Commodities Centre.

⁴ United Nations Guiding Principles on Business and Human Rights, (adopted 16 June 2011) available at https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf (accessed 14 September 2021)

- (a) *Responsible Metals and Supply Chain Policy;*
- (b) *Procurement and Contract Management Policy;*
- (c) *Supplier Code of Conduct;*
- (d) *Internal Code of Conduct;*
- (e) *Grievance Resolution Procedure;*
- (f) *Equal Opportunity Procedure; Whistleblowing Policy;*
- (g) *Sexual Harassment and Sex Discrimination Prevention and Response Procedure;*
- (h) *Responsible Sourcing of Metals Program;*
- (i) *Vendor Onboarding Procedure;*
- (j) *Recruitment and Selection Guide;*
- (k) *Inclusive Language Guide; and*
- (l) *Customer Service Code of Conduct.*

4. Human Rights In Focus

The Perth Mint recognises the potential material impact of human rights violations in our industry. To mitigate/counteract these risks, we support:

- (m) fair labour practices;
- (n) occupational health and safety rights for workers;
- (o) the right to peaceful assembly and freedom of association;
- (p) the right to fair treatment and the right to security of person;
- (q) the rights of people to have a healthy environment and oppose practices that are harmful to the environment;
- (r) prioritising and improving environmental and social practices in our business operations;
- (s) the rights of indigenous peoples and/or communities potentially impacted by our operations and respect the principles of free, prior, and informed consent; and
- (t) equal opportunity and diversity in our workforce.

We oppose:

- (a) all forms of slavery, servitude, forced and bonded labour;
- (b) child labour and adhere to whichever is the highest in minimum age provisions in local and international law;
- (c) practices that are harmful to the environment; and
- (d) all forms of discrimination.

5. Due Diligence, Monitoring and Review

To ensure compliance with our human rights commitment, we will:

- (a) conduct due diligence to identify any actual or potential adverse impact on fundamental human rights in our supply chain and operations;
- (b) take appropriate action to prevent, mitigate or account for any actual or potential adverse impacts;
- (c) depending on the circumstances, we will:
 - (i) conduct risk-based assessments of any adverse human rights impacts identified by us in our operations or our engagement with a Direct Supplier;
 - (ii) engage in meaningful consultation with affected groups and other stakeholders to improve our commitment;
 - (iii) monitor progress to prevent or mitigate potential or actual adverse human rights impacts;
 - (iv) conduct human rights impact assessments, on-site audits, or other appropriate investigations.
 - (v) establish a process for remediation of adverse human rights impacts and where appropriate, undertake that remediation; and
 - (vi) seek to influence Suppliers to ensure that they undertake the remediation of any actual adverse human rights impacts associated with their business operations;

- (d) incorporate a requirement to comply with this policy in all relationships with a Direct Suppliers and take appropriate steps to confirm that the terms are being adhered to;
- (e) depending on the circumstances, we will:
 - (i) communicate this policy to all relevant stakeholders in our supply chains and operations;
 - (ii) exercise our influence to seek confirmation that our Suppliers and any other organisations or individuals we engage with, act in accordance with this policy; and
- (f) engage in appropriate action where any Supplier breaches this policy and fails to take appropriate remedial steps, which may involve suspending or terminating any commercial arrangements. We will assess what constitutes appropriate action on a case-by-case basis;
- (g) provide regular human rights training to our employees, and where appropriate Direct Suppliers, to ensure they are aware of, and act in accordance with this policy and our expectations;
- (h) establish internal and external grievance mechanisms so that complaints about potential or actual adverse human rights impacts can be raised and investigated;
- (i) conduct periodic monitoring and/or exercise our audit rights in relation to our supply chains to monitor compliance with the terms of this policy;
- (j) identify specific roles or business units within our organisation who will be responsible for monitoring the implementation of this policy throughout our supply chain; and
- (k) continue to review our policies, standards, practices, and procedures to maintain industry best practice.

6. This Policy and Local Laws

As part of our commitment to human rights we will always seek to comply with applicable laws and respect the rule of law.

Human rights are a priority for us and is a fundamental part of how when we do business, engage the communities, and markets in our supply chains.

As such we are committed to applying these human rights standards set out in this policy even where:

- (a) local laws fall short of, or are conflicting with, these internationally recognised human rights; and/or
- (b) local government administration or law enforcement are unable or unwilling to ensure compliance with these human rights standards.

7. Definitions

The following definitions apply to this policy:

Direct Supplier

All Suppliers who have a business or legal relationship with us (or want to have a business or legal relationship with us) including any one in contractual relationship with The Perth Mint such as our precious metals Suppliers, partners or joint venturers and contractors.

Supplier

Includes Direct Suppliers, but is a broader term that means any individual or organisation that is a participant in our supply chain.