HUMAN RIGHTS POLICY.



1. Purpose

Shuka Minerals PLC and its subsidiaries believes human rights must be inherently afforded to all people, regardless of who they are, the circumstance they are in, or where they are located. Human rights recognise the inherent value of each person, based on principles of dignity, equality, and mutual respect.

The Company acknowledges its responsibility to avoid infringement of human rights and address adverse human rights impacts through its activities, supply chains, and business relationships. The Environmental and Social Governance ("ESG") and Corporate and Social Responsibility ("CSR") directive being employed across the entire global extractive industries are core to Shuka's behaviours.

2. Company Commitment

The Company commits to supporting, respecting and protecting internationally proclaimed human rights in alignment with the *United Nations Guiding Principles on Business and Human Rights, International Labour Organisation Declaration on Fundamental Principles and Rights at Work,* and *OECD Guidelines for Multinational Enterprises,* and as a signatory to the UN Global Compact, we work to incorporate the Ten Principles of the UN Global Compact in our strategy and operations.

The Company commits to supporting the elimination of all forms of modern slavery including forced or compulsory labour, child labour, and human trafficking across our operations or supply chains.

The Company aims to achieve this through:

3. Governance

- Encouraging and supporting reporting of human rights violations including any form of intimidation
- such as bullying, sexual harassment, physical or verbal abuse, retaliation, or any other forms of harassment.
- Conducting ongoing human rights due diligence to assist in identifying, preventing, and addressing
 any involvement in human rights risk across our operations, joint ventures, and business
 relationships.
- Monitoring and reporting on human rights impacts and remedying negative impacts as appropriate.
- Creating awareness of human rights throughout the organisation and integrating relevant practices into systems and processes.
- Communicating the policy to employees and external stakeholders.
- Collaborating with external subject matter experts and integrating learning into policy and practice.
- Adopting programmes to address industry-specific human rights issues as appropriate.
- Providing accessible grievance mechanisms for stakeholders and communities to raise concerns.



4. Communities

- Recognising and respecting the human rights of the communities in which we operate, including any vulnerable groups that may be affected by our operations.
- Respecting Traditional Owners, their culture, and connection and rights to land and water in alignment with the principles of the *United Nations Declaration on the Rights of Indigenous Peoples*.
- Respecting the rights and freedoms of everyone without discrimination based on factors such as but not limited to gender identity, culture, ethnicity, race, religion, family or marital status, sexual orientation, age, disability, political affiliation, union membership, or socio-economic background.
- Respecting everyone's right to freedom of movement.
- Ensuring that all security providers engaged by the Company respect the human rights and public freedoms of all stakeholders and operate consistent with the provisions of the Voluntary Principles on Security and Human Rights and UN Basic Principles on the Use of Force and Firearms.

5. Workplace and Employment Conditions

- Respecting the minimum age of employment in compliance with applicable laws and international standards
- Paying legal minimum wage or higher and ensuring working hours (including overtime) do not exceed the legal maximum working hours.
- Ensuring there is equitable pay and opportunity for like for like positions without any discrimination
- Respecting employees' lawful rights of freedom of association and collective bargaining, free from reprisal, intimidation or harassment.

6. Compliance

- Any person who knowingly breaches this Policy may be subject to disciplinary action.
- Contractors, suppliers and business partners have a responsibility and obligation to comply with this policy. Those who are found to have violated human rights and have not taken appropriate actions to rectify, may have their contractual relationship with the Company suspended or terminated.
- Directors, officers, employees, suppliers, and contractors have an obligation under this Policy to report any suspected or actual cases of modern slavery or violation of human rights. Reporting should be done through the executive management team or in accordance with the Company's Whistleblower Policy.



4. Review of Policy

The Board will review this Human Rights Policy at least annually, and update as required.

This version of the Human Rights Policy was reviewed on 29 August 2025.

Director and CEO

29th August 2025