

HUMAN RIGHTS POLICY



1. PURPOSE

BCI Minerals Limited and its wholly owned subsidiaries (BCI) are committed to respecting internationally recognised human rights in all aspects of the company's business.

We recognise our responsibility to avoid, or where we cannot avoid, address adverse human rights impacts through our operations, supply chains and business relationships, and to address impacts where they occur.

This Policy applies to BCI Directors, employees, contractors, suppliers and business partners.

2. OUR COMMITMENT

BCI is committed to respecting human rights in alignment with the principles set out in:

- The International Bill of Human Rights
- The International Labour Organisation Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights

BCI will:

- Respect the human rights of our employees, contractors, Traditional Owners, local communities and workers within our supply chain, with a focus on those groups most at risk of adverse impacts
- Comply with all applicable laws relating to human rights and modern slavery in the jurisdictions in which we operate, and seek to apply consistent standards across our operations where practicable
- Prohibit forced labour, child labour, human trafficking and all forms of modern slavery within our operations and business relationships.
- Respect the rights, culture and connection to land and water of Indigenous peoples.
- Promote a workplace that is safe, inclusive and free from discrimination, harassment and retaliation.
- Support fair wages and safe working conditions in accordance with applicable laws and industry standards.

3. IMPLEMENTATION AND GOVERNANCE

BCI integrates human rights considerations into its governance, risk management and operational decision-making processes.

BCI will:

- Undertake periodic human rights and modern slavery risk assessments across our operations and supply chain, including entities we own, control, or are directly linked to through business relationships.
- Apply risk-based supplier due diligence, with enhanced review and monitoring of suppliers operating in higher-risk jurisdictions or industries.

- Incorporate human rights expectations into procurement, contracting and supplier onboarding processes, including contractual rights to request information, conduct audits and require remediation where risks are identified.
- Actively monitor high-risk contracts and activities, including logistics and transshipment services, to verify supplier self-assessments and ensure identified risks are appropriately addressed.
- Maintain oversight of human rights and modern slavery risks to monitor identified issues, track mitigation actions, and identify emerging concerns.
- Provide accessible and confidential grievance mechanisms for employees, contractors, suppliers, Traditional Owners and community members, with formal processes to record, escalate and resolve complaints.
- Investigate and remediate substantiated human rights impacts, taking corrective action where required.
- Provide training and awareness sessions for employees and contractors to support identification and management of human rights and modern slavery risks.
- Monitor, review and report on our human rights performance, including through sustainability disclosures and our Modern Slavery Statement, and periodically review this Policy to ensure it remains fit for purpose as our operations evolve.
- This Policy reflects BCI's commitment to continuous improvement and will be regularly reviewed and refined to respond to emerging risks, regulatory developments and evolving stakeholder expectations.

4. SUPPORTING DOCUMENTS

Respect for human rights is embedded in other BCI policies and procedures, including:

- BCI Vision and Values
- Anti-Bribery and Corruption Policy
- People Policy
- Privacy Policy
- Whistleblower Policy
- Health and Safety Policy
- Environment Policy
- Community Policy
- Diversity, Equity and Inclusion Policy
- Cultural Heritage Policy

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