

# Responsible Social Engagement Policies (RSEP)

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## Foreword

At DEM we are deeply committed to upholding the highest standards of human rights throughout our operations. Our approach is guided by internationally recognized frameworks, including the UN's Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the ILO's conventions, additionally we apply the local law of the project's region. We recognize the significant impacts our activities can have on local communities and environments, and we aim to ensure that our operations not only respect human rights but also contribute to sustainable development. This policy outlines our commitments, responsibilities, and methodologies for managing human rights risks across our global mining activities.

This commitment extends to all our stakeholders, including employees, communities, and partners. We actively work to prevent any form of discrimination, exploitation, or abuse, and we strive to ensure that our business practices contribute positively to the well-being of the people and communities we engage with. Through ongoing training, policies, and partnerships, we continually reinforce our dedication to protecting and promoting human rights in every aspect of our work.

### Our commitment

This Human Rights Policy establishes a comprehensive framework to guide us in identifying, assessing, and managing any human rights risks. Our commitment extends to respecting the rights of all stakeholders, including our employees, local communities, and other affected parties. Through clear and actionable procedures, we ensure that human rights concerns are addressed promptly and effectively, fostering a respectful and responsible operational environment.

### Scope

This policy applies to all DEM operations, including subsidiaries, joint ventures, and contractors. It is relevant to all employees, suppliers, and stakeholders involved in our mining activities. We also expect our business partners to adhere to similar human rights standards, ensuring consistency across our supply chain and partnerships.

## Human Rights Respect Policy

Human rights are at the heart of everything we do. We are committed to ensuring that all our raw materials are sourced responsibly, without any human rights violations.

We believe that respecting the rights of all individuals is essential to the success and sustainability of our operations. We are dedicated to creating a safe, fair, and inclusive environment where everyone is treated with dignity and respect.

## Human Rights responsibility

DEM is committed to respecting human rights. We are committed to compliance with the following international standards:

- The Ten Principles of the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- United Nations Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social, and Cultural Rights (ICESCR)
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy (MNE Declaration) and ILO Convention 169

## Human rights protection

### Prohibition of child labour

Every child deserves a safe and nurturing environment to grow, learn, and thrive. We are dedicated to ensuring that no work prevents a child from getting an education or enjoying their childhood. Protecting their dignity, health, and safety is our top priority. We do not tolerate any form of child labour, especially the most harmful kinds that exploit or endanger young people under 18. We carefully check the age of all applicants and employees to make sure they are of legal working age and ensure that any tasks given to those under 18 are safe and appropriate for their age.

Our measures for prohibiting child labour:

**Minimum Age Compliance:** We strictly prohibit the employment of individuals under the age of 18 in any exploration or associated activities.

**Awareness & Training:** Training programs for managers, contractors, and local communities are implemented to raise awareness of child labour risks.

**Reporting Mechanisms:** Establish confidential and accessible grievance channels for reporting child labour concerns without retaliation.

### Prohibition of forced labour

We are firmly committed to rejecting any form of forced or compulsory labour. We oppose the use of forced labour in any part of our business, from the very start of our supply chain to the end. This commitment includes a strong stance against all forms of modern slavery and human trafficking. Every employment contract within our operations and those of our suppliers must be entered into voluntarily. Both parties should always have the right to terminate the employment relationship with proper notice, as required by law or agreement.

Our measures for prohibiting forced labour:

**Voluntary Employment Contracts:** All workers must sign contracts freely, with clear terms and conditions explained in a language they understand.

**No Retention of Documents:** Passports, IDs, or personal documents of employees shall never be withheld by the company or contractors.

**Freedom of Movement:** Workers must have the right to leave the workplace and terminate employment according to legal notice periods.

### **Freedom of association and right to collective bargaining**

We uphold the right of employees to form unions and engage in collective bargaining to negotiate their working conditions. Our culture is rooted in trust and constructive cooperation with employee representatives. We strive to maintain positive relationships even when opinions differ, ensuring that employees are neither favoured nor discriminated against for their union affiliations or decisions not to join. In locations without formal employee representation, we encourage regular consultations between employees and management.

### **Protection from discrimination**

Treating all employees equally is a cornerstone of our company's values. We do not tolerate any form of discrimination or unequal treatment. Across our entire supply chain, we work to ensure that no one is unfairly treated, harassed, or given preferential treatment based on characteristics like gender, skin colour, religion, nationality, political beliefs, ethnicity, disability, age, sexual orientation, or any other legally protected status. We support initiatives aimed at addressing the impacts of past discrimination and actively promote diversity, fostering an open and inclusive workplace culture.

### **Right to health and occupational safety**

The health and safety of our employees are our top priorities. We strictly follow all applicable occupational health and safety laws worldwide, often going beyond these requirements to implement additional safety measures. We are committed to ensuring the well-being of everyone working within our supply chain, taking every precaution to prevent harm as a result of their work.

### **Right to fair remuneration**

We provide competitive, performance-based compensation along with additional benefits to our employees. Our global compensation practices are founded on principles that ensure fairness and adherence to local legal standards, including minimum wage laws. We ensure that wages and expenses are paid promptly and in full, using recognized currencies, and only withhold payments when there is a clear legal basis for doing so.

### **Working hours**

We believe that a balance between work and personal life is crucial. Our working time principles take into account both operational needs and individual preferences. We follow the highest standards in regulating working hours, including proper compensation for overtime, whether through additional pay or time off. We ensure that our working time regulations comply with national laws and support our global operations in implementing fair and appropriate working hours.

### **Rights of local communities and indigenous peoples**

Our business activities are conducted with respect for the health, livelihoods, and cultural heritage of local communities and indigenous peoples. We carefully assess risks related to environmental issues

such as pollution, deforestation, and hazardous waste management to protect the rights and well-being of these groups. We are strongly against the destruction of cultural and ritual sites and oppose unlawful evictions or the deprivation of land, forests, and water sources. We are committed to minimizing any negative impact on local populations from our construction and operational activities, using environmentally friendly and resource-efficient processes.

### Handling high-risk raw materials

We take a cautious approach to sourcing and processing raw materials, aiming to prevent any adverse impacts on human rights and environmental standards. In our risk assessments, we recognize that certain materials may pose significant risks to people and the environment. We act in accordance with international conventions such as the Minamata Convention on Mercury, the Basel Convention on Hazardous Wastes, and the Stockholm Convention on Persistent Organic Pollutants to mitigate these risks.

### Protection of personal data

We are deeply committed to protecting the privacy rights of our employees, customers, and business partners. We focus on compliance with applicable data privacy laws, ensuring that personal data is handled with the utmost care and in accordance with local and international standards. We strive to protect the individual rights of every person whose data we process, including their rights to access, correct, block, or delete their information.

## Risk assessment

Our approach to risk management is deeply integrated with our commitment to human rights and environmental sustainability. During regular risk management meetings, we identify potential and actual risks across our project and product portfolio, including serious concerns such as forced labour, slavery, child labour, discrimination, and environmental damage.

Our comprehensive risk assessment is a cornerstone of our due diligence process, evaluating human rights and environmental risks on both an annual and ad-hoc basis. This dynamic process is updated immediately in response to changes in business activities or new insights from relevant reports.

Key elements of our risk assessment include:

- **Risk Identification:** We systematically collect and analyse data to identify potential human rights risks related to our activities, including labour rights, community impacts, and environmental concerns. We use external data sources to assess country-specific and commodity-related risks, as well as risks inherent to our business operations and those of our partners.
- **Stakeholder Engagement:** We actively engage with affected stakeholders to understand their concerns and perspectives, ensuring their voices are considered in our risk assessments and decision-making processes.
- **Risk Analysis and Assessment:** Identified risks are evaluated and weighted based on severity and likelihood, enabling us to gauge our overall risk exposure. This analysis informs the implementation of control measures, such as audits and questionnaires, to further clarify and mitigate these risks.
- **Prioritization of Risks:** Risks are prioritized according to their nature and our ability to influence outcomes. This prioritization guides our corporate decision-making, influencing everything

from supplier selection to market entry strategies. Potential conflicts between business objectives and human rights are regularly reviewed by our Board of Management to ensure alignment with our ethical commitments.

- **Mitigation and Monitoring:** We implement targeted mitigation measures to address identified risks and continuously monitor their effectiveness. This ongoing process helps us adapt internal regulations, processes, and training as needed, ensuring that our operations consistently reflect our commitment to human rights and environmental stewardship.
- **Transparent Reporting:** We are committed to transparently reporting on our human rights performance to stakeholders, providing regular updates on the effectiveness of our risk management and due diligence efforts.

The results also provide us with a basis for adapting internal regulations, processes, and training, where needed, and helps us prevent potential human rights violations and ensures that our business practices are aligned with our core values of respect, responsibility, and sustainability.

## Community relations policy

The purpose of this Community Relations Policy is to establish guidelines for fostering respectful, transparent, and constructive relationships between our company and the communities within our area of influence. Our goal is to contribute to the well-being and development of these communities while ensuring our operations are conducted responsibly and sustainably.

DEM is committed to engaging with communities through transparent and inclusive dialogue, ensuring their voices are heard in decision-making processes. We support community development initiatives that align with local needs and contribute to sustainable development while ensuring our operations do not harm the cultural heritage, livelihoods, or environment of local communities. We regularly review and improve our attention channels to meet stakeholders' needs effectively, providing timely responses and resolutions to reported concerns with a focus on transparency and fairness.

### Guiding principles

Our community relations approach is grounded in the following core principles:

- **Respect and Dignity:** We treat all community members with respect, recognizing their inherent dignity and rights, regardless of gender, ethnicity, religion, or socioeconomic status.
- **Transparency:** We communicate openly and honestly about our operations, potential impacts, timelines, and decisions that may affect local communities.
- **Inclusivity:** We ensure that all community voices — including marginalized and vulnerable groups — have meaningful opportunities to participate in dialogue and consultation processes.
- **Accountability:** We take responsibility for our actions and their consequences, and we hold ourselves to the commitments we make to communities.
- **Cultural Sensitivity:** We respect local customs, traditions, and cultural heritage, and integrate this understanding into all aspects of our engagement.
- **Sustainability:** We promote long-term shared value by supporting community development initiatives that endure beyond the life of our operations.

## Stakeholder identification and Mapping

DEM is committed to systematically identifying all stakeholders within its area of influence of each project, updating this mapping throughout the project lifecycle. Stakeholder identification will consider:

- Local communities and households directly or indirectly affected by operations
- Indigenous Peoples and traditional landowners
- Local and national government authorities
- Non-governmental organizations and civil society groups
- Local businesses and economic actors
- Vulnerable and marginalized groups, including women, youth, and elderly populations

Stakeholder maps are being reviewed and updated annually, or when significant changes in operations or community dynamics occur.

## Community Investment and Development

DEM is committed to contributing positively to the social and economic well-being of communities in its area of influence. Community investment initiatives will be:

- Developed collaboratively with communities to reflect locally identified priorities and needs
- Aligned with regional and national sustainable development goals
- Focused on building long-term resilience, including through local hiring, procurement, and skills development
- Monitored and evaluated to ensure effectiveness and accountability

DEM will avoid creating dependency by designing programs that strengthen community capacity and are sustainable beyond the operational life of our projects

## Stakeholders' attention system

We recognize the importance of addressing stakeholder concerns promptly and effectively. DEM's Stakeholders' Attention System includes multiple, clear and accessible channels for stakeholders to raise concerns, including anonymous reporting options. This system also includes an accessible, transparent, and non-retaliatory grievance mechanism for communities and individuals. The grievance mechanism is designed to be:

- Accessible: Available to all stakeholders including community members regardless of literacy, language, or location.
- Legitimate: Operated impartially and with appropriate oversight
- Transparent: Providing clear information on the process, timelines, and outcomes

- Equitable: Ensuring all parties have access to the information and expertise necessary to engage fairly
- Confidential: Protecting the identity of complainants who request anonymity
- Multiplatform: Multiple channels are available for accessing to this mechanism including website formular, email, mobile messages and personal communications.

Grievances sent in shall be confirmed and resolved within a timeframe communicated to the affected party. Each step should be recorded and anonymized. DEM commits to ongoing review and improvement of grievance channels to ensure they remain effective and responsive to community needs.

## Monitoring, Reporting and Review

DEM will monitor the effectiveness of its Responsible Social Engagement Policy through key performance indicators (KPIs), periodic community perception surveys, and audits. Findings will be reported internally at least annually and disclosed to external stakeholders according to specific needs.

This Policy should be reviewed every two years, or sooner if there is a significant change in operations, applicable law, or international standards. Revisions will be made in consultation with relevant internal and external stakeholders, and approved by the Board of Directors.