

Human Rights Policy

Purpose

Bhumi Group (“Bhumi”) is committed to the principles of sustainable development including protecting human life, health, and environment, provisioning of employment and business partner opportunities; promoting social well-being and adding value to the communities, near to the areas where we operate.

Protecting and respecting human dignity is central to our everyday business operations. We conduct our businesses in a fair and equitable manner, meeting our social responsibilities as a direct and indirect employer. We are committed to respecting the human rights of all our stakeholders including employees, contractor workforce, business partners, suppliers and local communities & society.

This policy is forward looking and is aligned with United Nations Declaration on Human Rights, Universal Declaration of Human Rights (UDHR), and ILO.

The policy sets a vision for businesses across the Bhumi group.

Scope

This policy is applicable to all Bhumi companies, including subsidiaries, joint ventures, mining sites, licenses, partners, corporate offices, and research facilities. This policy is also applicable to all Bhumi employees, contractor employees, business partners, suppliers, and others with whom Bhumi does business.

In addition, this policy is applicable throughout the operational lifecycle of the projects and mines, covering stages from exploration and planning to evaluation, operation, and closure.

Objectives of the Human Rights Policy

Bhumi will strive to:

- Be compliant with national regulatory requirements regarding human rights, labor practices and in all jurisdictions in which we operate.
- Develop systems to identify, manage, and mitigate risks and adverse impacts on direct and indirect workforce, communities, and environment.
- Avoid complicity with parties violating principles such as United Nations Declaration on Human Rights, Universal Declaration of Human Rights (UDHR), and ILO.
- Promote a culture of respect by raising awareness on human rights, amongst employees, communities, business partners and relevant stakeholders.
- Assess risks against the policy expectations, across the company operations and the supply chain and reporting performance to ensure transparency.
- Set targets and objectives to avoid, reduce or mitigate human rights and labor related impacts on people and planet.
- Review the performance against the policy on a periodic basis as per our objectives including the sharing of good practices throughout the organization and stakeholders.
- Implement community development plan.
- Ensure a fair and effective grievance mechanism accessible to all stakeholders.
- Be committed to supporting and assisting the communities in which we operate through a variety of means including charitable fund-raising, sponsorship of community projects and voluntary work by employees. We conduct our business with respect and consideration for the good of local communities, taking steps to minimize any disturbance as a result of our operations.
- Promote fair, safe, and healthy working conditions as guided by the ILO Declaration on Fundamental Principles and Rights to Work.

Our commitment towards employees, contractual workers and local communities

- Have zero tolerance for any form of forced, compulsory or child labor, as well as human trafficked labor working at Bhumi managed and operated businesses or within business relationships across the supply chain.
- Recognize and respect employee rights to associate freely and to collective bargaining.

- Ensure that all employees and contractor workforce are fairly and equitably paid, the remuneration structure is compliant with statutory obligations of the jurisdiction in which we operate.
- Hire competent employees, with preference to local employment as far as possible.
- Ensure relevant and appropriate training opportunities are made available for the employees and the contractor workforce for a continuous professional development.
- Ensure non-discrimination and treat all employees with respect and dignity and judge solely on their performance irrespective of their race, religion, caste, nationality, ethnicity, gender, age, disability, sexual orientation, and any other characteristic.
- Respect and preserve the cultural lifestyle and heritage of the local communities.
- Engage with the local community to understand their priorities and concerns and informing them of operations that might affect them in an accurate, transparent, culturally appropriate, and timely manner.
- Avoid and minimize physical and economic displacement of people as much as possible by adopting appropriate practices.

Due Diligence

The aim of Human Rights Due Diligence is to identify and evaluate potential or actual human rights impacts that may be associated with a new project or operation in a new geographical territory; mergers and acquisitions; joint ventures; supply chain activities and business relationships, etc.

The ability to assess accurately risks present in our operating environment is critical to the security of personnel, local communities and assets; the success of our short and long-term operations; and to the respect of human rights.

The due diligence assessment may require an extensive review of external factors to be conducted to enhance understanding of the political, economic and social context. This may require information to be obtained from different sources including: local and national governments, security firms, other companies, home governments, multilateral institutions, and civil society organisations knowledgeable about local conditions.

A review of external factors is particularly important where the geopolitical environment is changing and unpredictable and where this causes changes to military and social situations. The due diligence assessment will need to have access to up-to-date information and Bhumi will need to enhance this through maintenance of productive relations with local communities and government officials. The external factors review should typically consider as a minimum the following:

- *Identification of security risks* - arising from political, economic, civil or social factors and which may present a risk of adverse impact to the human rights of Bhumi's employees, contractors, the community and external stakeholders.
- *Potential for violence and conflict* - identification of and understanding the root causes and nature of local conflicts, as well as the level of adherence to human rights and international humanitarian law standards by key actors in the host country.
- *Human rights records* - review any available human rights records of public security forces, paramilitaries, local and national law enforcement, as well as the reputation of private security. Awareness of past abuses and allegations may help to avoid recurrences as well as to promote accountability.
- *Issues of context* - consider applicable local laws as well as international human rights provisions and seek ways to honour international principles when faced with conflicting requirements. Due diligence should consider the local prosecuting authority and judiciary's capacity to hold accountable those responsible for human rights abuses and for those responsible for violations of international humanitarian law in a manner that respects the rights of the accused. Consider also the political stability of the host government and also its reputation and respect for human rights and ability to enforce the rule of law; at both local and national levels.

Any grievance or complaint in respect to the Human Right Policy as stated above could be raised on our Hotline number specified on our website.



Responsibility & Review

This policy is part of the Bhumi Sustainability Framework and each Bhumi business shall implement this policy. The Business Head will be responsible for controlling and full implementation of the policy and associated standards. The Board ESG Committee will review this policy annually and recommend appropriate revisions as may deem necessary.

A handwritten signature in blue ink, consisting of several fluid, connected strokes.

Authorized Signatory
CEO
Bhumi Ventures L.L.C-FZ, Dubai

Date: 14.10.2025