

Human Rights Policy

Policy Statement

Nickel Mines Limited (the 'Company', 'Nickel Mines', or 'we') is committed to protecting and respecting human rights, as well as providing remediation for any breaches of the policy.

This policy is applicable to Nickel Mines and its controlled entities. We also encourage the adoption of these concepts across the Company's entire value chain.

The Company believes that its business can help promote human rights through its operations, but it also could pose risks to human rights if not properly managed and monitored.

Objectives

Nickel Mines has created this policy to ensure that the Company can protect and respect human rights at all levels including individuals, operations, and resources. Under this policy, the Company aims to give guidance on implementing **human rights due diligence** continuously, by following the core components below:

1. **To identify** human rights risks in all the Company's operations by considering all stakeholders involved, particularly rights-holders such as employees, indigenous people, local communities, human rights defenders, supply chain workers, and business partners.
2. **To encourage** human rights as a topic for every employee throughout the business.
3. **To prevent and mitigate** human rights issues by taking appropriate actions and integrating findings from impact assessments across relevant Company processes, to ensure that human rights are upheld and protected against all forms of human violation in its business operations and sourcing.
4. **To ensure compliance** with all local laws and adopt relevant codes of practice relating to human rights.
5. To maintain meaningful **stakeholder engagement** in all human rights policy planning and implementation.

Scope and Elements

1. General human rights aspects

Operational practices in the nickel sector, like other sectors, have the potential impact on a variety of fundamental human rights defined by laws and regulations in our business areas. Thus, the Company respect and protect human rights by implementing this policy for all **employees**, and it covers at least the following elements:

- No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.
- No one shall be subjected to torture or cruel, inhuman or degrading treatment or punishment.
- Everyone has the right to a standard of living adequate for the health and well-being of himself and his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
- No one shall be arbitrarily deprived of his property.
- No one shall experience discrimination through the distinction of any kind as to race, colour, sex, language, political, religion, national or social origin, property, birth or other statuses.
- Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
- No one shall be subjected to arbitrary interference with their privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.
- Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.

2. Labour practices

Nickel Mines believes that its workers should be treated with dignity, respect, and fairness, and should not be subject to harassment, discrimination, forced labour, or inhumane treatment. We are working continuously to provide a safe, inclusive work environment for our employees and contractors in line with international labour standards wherever we do business. To promote these values across our supply chain, we implement robust oversight mechanisms and expectations for our business partners to meet these same standards in their operations. Thus, we continuously communicate with the rights-holders to implement and improve the criteria below:

- Health and safety in the workplace.
- Rights to leave, move, rest, and leisure, including reasonable limitation of working hours and periodic holidays with pay.
- Fair living wage.
- Non-discriminatory work practices.
- Collective bargaining.
- Proper and comfortable housing for the workers.
- Clean water availability.
- Right to form and join trade unions for the protection of his interests.
- Grievance mechanism.
- Violence, harassment, bullying prevention and protection.
- Everyone who works has the right to just and favourable remuneration ensuring for themselves and their family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
- Equal career and skills development.

3. Rights of indigenous peoples and other local communities

Nickel Mines' operations require land acquisition by purchasing or leasing the lands. In both Australia and Indonesia, lands might already be used by other tenants or are part of indigenous communities. Thus, sometimes using the land for its operations might involve the resettlement of these communities. If we fail to appropriately address resettlement, land status, and traditional land use, issues might cause strong public opposition towards a project and its operators. Hereby, the Company ensures core elements below:

- Safe environment (in relation to environmental protection policy).
- Fair access to resources for local peoples (including roads, soil, water, etc.).

4. Women, youth, and vulnerable groups empowerment

We believe in the equality of opportunity and treatment for all women and men, local people and outsiders, as well as people with disability. In the workplace and/or local communities, women are often under-represented and under-resourced, so through our business model, we encourage women and/or young employees as well as employees with disabilities to be involved in the Company's decision-making process. This can have positive impacts on their families, their children's education, and health.

5. Meaningful stakeholder engagement

Nickel Mines is committed to integrating human rights into its environment and social risks assessment processes. The Company will continue to meaningfully engage with rights holders, with such engagement rooted in the international human rights framework. This ensures that everyone has the right to share their personal opinions and have their own experiences.

6. Actions and Implementations

Nickel Mines commits to take comprehensive actions in implementing, maintaining, and improving its human rights policy. To ensure the proper implementation of this policy, the Company will implement the following actions:

a. Identify human rights risks in Nickel Mines' operations and value chain actors

The Company commits to ensure that the implementation of this policy is continuous and consistent. We take steps in assessments and evaluations to improve mechanisms and ensure the full implementation of this policy. The following steps can be done through but are not limited to the following:

- Assess the risks that might happen in Nickel Mines' current practices based on the relevant laws and regulations. It must cover all issues found in the mining industry such as land acquisition conflict with local people, mining workers' exploitation, hazard in the workplace, harassment, etc.
- Integrating human rights risk assessment into all environment and social assessment processes.
- Perform regular audits to ensure that human rights violence is not taking place.

b. Maintain the rights of indigenous peoples and other local communities

We commit to ensure that the implementation of this policy covers the rights of indigenous people around the mining area, particularly the criteria mentioned in this policy.

c. Support and empower women, youth, and vulnerable groups in the Company and local communities

At a minimum, the following steps would be conducted by the Company:

- Evaluate all of the Company's employment processes considering the participation of women, youth, and other vulnerable groups.
- Monitor all grievances submitted by all employees, then conduct root cause analysis to find the closure and mitigation plan. This is particularly related to equality, sexual harassment, and other human rights violence practices.
- Create a Corporate Social Responsibility ('CSR') plan that involves vulnerable groups in the local communities.

7. Review of the Human Rights Policy

This policy can only be amended with the approval of the Board. The Company regularly evaluates the effectiveness of its human rights approach and its integration with other activities, including risk management, to ensure that its internal control systems and processes are monitored and updated on an ongoing basis. It will be reviewed from time to time to ensure that it remains effective and meets best practice standards and the needs of the Company.