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Human Rights Policy Statement

Tharisa plc and Subsidiaries

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HUMAN RIGHTS POLICY STATEMENT

THARISA PLC
(Incorporated in the Republic of Cyprus with registration number HE223412)
JSE share code: THA | LSE share code: THS

Document Control

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Approved by	Board of Directors of Tharisa plc
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1. PURPOSE

Tharisa plc (the 'Company' and, together with its subsidiaries, the 'Group') is committed to conducting its business responsibly and with respect for the dignity, rights and wellbeing of all people affected by its operations. This Human Rights Policy Statement (the 'Statement') sets out the Group's commitment to respecting internationally recognised human rights and the principles through which that commitment is given effect.

The Board of Directors (the 'Board') recognises that respect for human rights is a fundamental responsibility of business. This Statement supports the Group's broader commitment to ethical leadership, responsible corporate citizenship and sustainable value creation.

2. SCOPE

This Statement applies to Tharisa plc and all entities within the Group, and to the following persons in the conduct of Group business:

- All directors, executives and the Company Secretary
- All employees, whether permanent, fixed term or temporary
- Contractors, consultants, agents and other representatives acting on behalf of the Group and
- Suppliers and service providers that do not act on the Group’s behalf, whose standards are expected to be consistent with this Statement

3. GUIDING FRAMEWORK

The Group's approach to human rights is informed by internationally recognised standards, including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation core conventions, the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact. Where applicable standards differ, the Group applies the most protective standard reasonably practicable.

4. HUMAN RIGHTS COMMITMENT

The Group is committed to respecting human rights across all of its operations. In giving effect to this commitment, the Group shall:

- Treat all people fairly and with dignity and respect, free from discrimination on any prohibited ground
- Promote diversity, equity, inclusion and equal opportunity
- Respect the rights of employees to freedom of association and collective bargaining, in accordance with applicable law
- Prohibit child labour, forced labour, compulsory labour and human trafficking within its operations
- Provide fair remuneration and lawful conditions of employment
- Maintain safe and healthy working conditions across all operations
- Respect the rights, livelihoods and cultures of host communities
- Engage in good faith with host communities and traditional authorities in proximity to the Group's operations, recognising the particular human rights sensitivities associated with community resettlement, access to water, land access and security around mining operations in South Africa and Zimbabwe
- Protect privacy and the lawful processing of personal information
- Ensure that security practices are lawful, proportionate and respectful of human rights
- Maintain accessible grievance mechanisms and protect persons who report concerns in good faith from retaliation

5. HUMAN RIGHTS RISK MANAGEMENT AND DUE DILIGENCE

Consistent with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, the Group conducts ongoing, risk-based human rights due diligence across its operations and value chain, proportionate to the severity of potential impacts and the nature of the jurisdictions in which it operates. This due diligence comprises:

- Identifying and assessing actual and potential adverse human rights impacts arising from the Group’s own activities and through its business relationships, including impacts on employees, contract workers, host communities, traditional authorities and informal miners
- Verifying that employment across the Group and its labour providers is lawful and freely chosen, and free from child labour, forced labour, compulsory labour, debt bondage, human trafficking and any other form of modern slavery, including through the review of recruitment and labour-broking practices
- Assessing the practices of suppliers, contractors, labour brokers and other business partners, and taking appropriate corrective action, up to and including termination, where standards are not met
- Integrating findings into the Group’s governance, enterprise risk management and operational decision-making
- Monitoring and tracking the effectiveness of preventive and mitigating measures and
- Maintaining accessible grievance mechanisms, protecting persons who report concerns in good faith from retaliation, and reporting on the Group’s human rights performance

Particular regard is given to potentially vulnerable stakeholders and to the heightened human rights sensitivities associated with mining operations in South Africa and Zimbabwe, including community

resettlement, access to water, land access and security arrangements. This section constitutes the Group's authoritative statement of its human rights and modern slavery due diligence, to which the Modern Slavery Statement gives effect and with which it should be read together.

6. SUPPLIERS AND BUSINESS PARTNERS

The Group expects suppliers, contractors and business partners to uphold standards consistent with this Statement. Suppliers and contractors are made aware of the Group's policies and standards, and the Group may take appropriate corrective action, including the review or termination of a commercial relationship, where an acceptable level of commitment is not demonstrated.

7. GOVERNANCE AND ACCOUNTABILITY

The Board

- Approves this Statement and sets the tone from the top in respect of human rights
- Oversees implementation through the Social and Ethics Committee, supported by the relevant Board committees

Management

- Is accountable to implement this Statement across the Group
- Embeds human rights considerations into operations, risk management and stakeholder engagement and
- Reports on material human rights matters to the Board through the appropriate governance structures

8. REPORTING CONCERNS AND REMEDY

Any person who becomes aware of an actual, attempted or potential adverse human rights impact connected to the Group's operations should report it promptly through any of the following channels:

- Their line manager or Head of Department
- The Company Secretary
- The Head of Internal Audit
- The chairmen of the Social and Ethics Committee or the Audit Committee
- The Group's confidential and anonymous Whistleblowing Hotline

Persons who raise concerns in good faith are protected from retaliation in accordance with the Whistleblowing Policy. Where the Group has caused or contributed to an adverse human rights impact, it is committed to providing or contributing to appropriate remedy.

9. MONITORING, REPORTING AND REVIEW

The Group reports on its human rights commitments and performance in the Integrated Annual Report, the Sustainability Report and such other reports as may be required by law or applicable listing requirements. This Statement is reviewed at least every two years by the Company Secretary, in consultation with the Social and Ethics Committee, and is submitted to the Board for approval when material revisions are required, or earlier if warranted by material changes to the Group's operations or the applicable framework.

10. RELATED DOCUMENTS

This Statement should be read in conjunction with:

- Modern Slavery Statement
- Code of Business Ethics and Conduct
- Group Governance Framework
- Board Charter of Tharisa plc
- Board Nomination, Diversity and Succession Policy
- Responsible Procurement and Sourcing Policy
- Whistleblowing Policy and
- Anti-Bribery, Anti-Corruption, Anti-Money Laundering, Sanctions and Counter-Terrorist Financing Policy

11. APPROVAL

This Statement was approved by the Board on 20 October 2026.