



OUR APPROACH TO HUMAN RIGHTS

All human beings are born free and equal in dignity and rights¹.

Human rights recognise the inherent value of each person, based on principles of dignity, equality and mutual respect. Respect for human rights is central to our commitment to operating ethically and responsibly. We celebrate the diversity, dignity and uniqueness of every individual. Not only is it the right thing to do, but it is critical to the success and integrity of operating as a responsible business.

Our commitments

We are committed to respecting all internationally recognised human rights as set out in the International Bill of Rights (comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. While we work to respect the rights of all stakeholders, we particularly focus our efforts on those people most vulnerable to harm, marginalised and at-risk groups, including Indigenous, Traditional and Tribal Peoples.

Meeting our commitments

The principles that support us to meet our commitment include:

- We conduct ongoing human rights due diligence to help us identify, prevent, mitigate and account for how we address any involvement in human rights risks across our operations², projects and business relationships;
- We provide accessible and safe grievance and redress channels for stakeholders to raise complaints about human rights;
- We have legitimate processes where we cooperate in remediating adverse human rights impacts that we have identified as having been caused or contributed to by South32; and
- We tailor our approach to the individual context at each location where we work.

1. Article 1, Universal Declaration of Human Rights.

2. Including tailings storage facilities.

Our management approach

Our Approach to Human Rights aims to manage risks to people across our operations and business relationships, with a particular focus on risks to vulnerable, marginalised and at-risk groups, including Indigenous, Traditional and Tribal Peoples.

- We undertake a range of human rights due diligence activities consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs), including regular human rights risk and impact assessments at our operations and projects, and assessments of the human rights risks³ within our supply chain⁴.
- We provide a range of mechanisms for raising human rights concerns, including our internal complaints processes, a confidential, global whistleblower hotline and community complaint and grievance processes⁵ at each of our operations and projects.
- We engage meaningfully with communities and other potentially impacted rights-holders, and include their perspectives in our human rights due diligence.
- We encourage an open civic space and respect human rights and environmental defenders, with a commitment to non-retaliation.
- We work to reduce the risk of modern slavery⁶ within our operations and supply chains.
- All suppliers are required to follow Our Code of Business Conduct, and confirm, through alignment with our Supplier Minimum Requirements, that they will work towards implementing core human rights standards, including those set out in the United Nations Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights of Work.
- We support the rights to freedom of association, collective bargaining, provision of decent work and are working towards embedding a living wage for our employees.
- We work to provide and maintain a safe workplace and create and maintain a work environment free from bullying, harassment, sexual harassment, discrimination and victimisation⁷.
- We conduct human rights due diligence in alignment with the ICMM Performance Expectations and the Global Industry Standard on Tailings Management.
- We expect our security providers to respect human rights in line with the Voluntary Principles on Security and Human Rights.

- Wherever possible, we will avoid acquisition of land which would result in involuntary physical or economic displacement. Unavoidable involuntary physical resettlement or economic displacement processes to be completed by us or on our behalf, will be informed by IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement.
- We have commenced work to align our due diligence activities for operating in, or sourcing from, a country that is identified as a conflict-affected or high-risk area with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- We conduct regular human rights training for employees and contractors and extend it to our suppliers. We also make the training available to other interested stakeholders.
- We track the effectiveness of our processes to continually improve our approach and embed human rights across our business, and publicly report our progress.
- Collaboration is crucial, and we seek to work together with our peers, suppliers, host governments, not-for-profit organisations, rights-holders and other stakeholders to deliver on our commitments. We communicate our human rights expectations to relevant stakeholders.

What guides us

Our approach is guided by the UNGPs, as well as other global standards and initiatives including:

- UN Declaration on the Rights of Indigenous Peoples;
- UN Global Compact Principles;
- UN Sustainable Development Goals;
- Voluntary Principles on Security and Human Rights; and
- ICMM Mining Principles: 2 – Decision-Making, 3 – Human Rights and 4 – Risk Management.

Our commitment to respecting human rights is supported by our Board-approved Sustainability Policy and Code of Business Conduct and is managed through our internal standards, which are supplemented by operational procedures that account for local and regional needs and regulatory requirements.

We maintain practices at each of our operations to comply with local laws, and where applicable law differs from the commitments in this approach, we seek to apply the higher standard to meet our human rights commitments.

Governance

Our Board has ultimate responsibility for our company's governance and strategic direction. Our Sustainability Committee assists the Board in its oversight of our sustainability management, performance, assurance and reporting practices of the Group. The Sustainability Committee oversees social performance and business ethics including business ethics transparency, modern slavery and human rights issues and responsible sourcing and selling.

Overall management accountability is assigned to our Chief Legal, External Affairs and Sustainability Officer, with our Chief Operating Officers and Chief Development Officer responsible for implementation at our operations and projects.

We periodically undertake internal assurance and independent third-party assurance, where appropriate, to assess compliance with our internal standards, as well as the ICMM Mining Principles and associated Performance Expectations, with a view to continually improving human rights management and performance.

Application

This approach applies to all Directors, management, employees, contractors and third parties who act on behalf of South32. It is made available both internally on our intranet and externally at www.south32.net. We also expect suppliers to respect human rights as set out in our Sustainability and Business Conduct – Minimum Supplier Requirements. We endeavour to influence our non-operated joint ventures to support the adoption of standards of conduct consistent with ours, as relevant within the limits of the joint venture arrangements.

Our CEO approved this approach in September 2023. Minor amendments were subsequently approved by the Chief Legal, External Affairs and Sustainability Officer in August 2025. This approach will be reviewed as necessary, so that it remains relevant and appropriate to South32's human rights activities.

To learn more

Further information on human rights, including performance and progress, can be found in the Sustainability section of our website and in our Annual Reporting Suite at www.south32.net.

3. Consistent with the ICMM Indigenous Peoples and Mining Position Statement.

4. Due diligence on our supply chain is described in our annual Modern Slavery Statement, available [here](#).

5. Consistent with the UNGP effectiveness criteria.

6. As defined in the Australian Modern Slavery Act 2018 (Cth).

7. As defined by the South32 [Code of Business Conduct](#).