



CMOC Kisanfu Mining

Human Rights Due Diligence

Summary Report Update

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Reviewed by: Triple R Alliance
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Introduction

Commissioned by CMOC Group Ltd. (CMOC), Triple R Alliance (TRA) conducted a Human Rights Due Diligence (HRDD) assessment for CMOC Kisanfu Mining (KFM) in the Democratic Republic of the Congo (DRC) between March and September 2024, and issued the *KFM Human Rights Due Diligence Summary Report* in September 2024. Conducted in accordance with the *UN Guiding Principles on Business and Human Rights* (UNGPs), the HRDD identified and prioritized KFM's salient human rights issues and provided recommendations to support continuous improvement.

As a key outcome of its first HRDD exercise, KFM developed and issued a *Human Rights Action Plan* (HRAP) in December 2024. The HRAP is intended to guide relevant functions in the ongoing due diligence, monitoring, and communication of salient human rights issues. This report provides an annual update, outlining governance arrangements for ongoing HRDD, progress on key actions, changes in the risk profile, and priority focus areas for the period from October 2024 to December 2025.

Overview of KFM

This section outlines several key contextual factors relevant to KFM's operations. These factors shape KFM's human rights risk profile and provide an important foundation for advancing HRDD as the project transitions from the construction phase to the production phase.

Compared with some neighbouring mining operations, the KFM concession is relatively small. This has, to a certain extent, reduced the likelihood of interaction with artisanal and small-scale mining (ASM) activities and related security incidents. KFM continues to monitor changes in the external operating environment and, through risk identification, site controls, and stakeholder engagement, seeks to reduce factors that may attract ASM activity and related interactions, thereby reducing potential human rights and reputational risks.

KFM's land acquisition and resettlement activities have largely been completed. Livelihood restoration and follow-up support measures remain under ongoing monitoring and implementation, and are aligned with, and complementary to, community development projects implemented under the *Cahier des Charges* and the donation framework, which allocates 0.3% of revenue to community development. KFM recognizes that land acquisition and resettlement are among the most complex and sensitive issues in mining development, with direct implications for community relations and the social license to operate. Accordingly, KFM will continue to prioritize procedural compliance, transparency of information, and outcome tracking in order to consolidate progress achieved to date.

KFM initiated the development and implementation of its HRDD framework at a relatively early stage. This has enabled human rights requirements to be more systematically embedded into management processes, systems, and site-level execution during the transition from construction to production. This, in turn, has reduced the costs and uncertainties associated with

retrospective adjustments. KFM will continue, through training, communication, and relevant mechanisms, to promote more consistent implementation across departments and contractors under a common set of standards, and to foster a sustainable human rights governance culture.

Aligned with CMOC's strategic vision of becoming a world-class international mining company, KFM continues to benchmark its practices against key international standards, including the Copper Mark, the Voluntary Principles on Security and Human Rights (VPSHR), the Responsible Minerals Initiative (RMI), and ISO management system standards, and to use these frameworks as important tools for strengthening ESG and human rights governance. These standards set clear expectations for ongoing due diligence, good industry practice, and evidence-based management, and are closely aligned with, and mutually reinforcing of, security, occupational health and safety, and environmental management systems. Guided by certification and assessment requirements, KFM will continue to address gaps, strengthen cross-functional coordination, and enhance the maturity and transparency of its human rights management system.

Key Developments During the Reporting Period

As the project has advanced and the contractor workforce has expanded, issues related to contractor worker rights, occupational health and safety, and the accessibility of grievance mechanisms have become increasingly salient. Key developments and management actions during the reporting period include:

- **Human rights governance:** The HRAP was issued in December 2024 and integrated into ESG management processes, forming an integrated management mechanism for HRDD implementation.
- **Management system certification:** ISO 45001 (Occupational Health and Safety), ISO 14001 (Environment), and ISO 9001 (Quality) certifications were obtained in November 2024, with surveillance audits conducted as planned through December 2025. These certifications support tracking of key management systems and mitigation measures that support our ongoing HRDD on many of our salient issues.
- **Responsible minerals due diligence:** KFM successfully completed the RMAP audit in December 2024 and a re-audit in December 2025, with no non-conformances identified. The assurance reviews KFM's OECD-aligned due diligence program and related controls including the identification and mitigation of salient human rights risks in the supply chain and confirmed that KFM's approach and mitigation measures are consistent with the RMAP standard.
- **Industry benchmarking:** A Copper Mark gap analysis was conducted in July 2025, which reviewed alignment with Copper Mark requirements, including those relevant to human rights due diligence. Findings were captured in a corrective action plan, and implementation progress is tracked on an ongoing basis.

- **Enhanced contractor ESG risk management:** Updated *Contractor ESG Risk Management Implementation Guidelines* were issued in October 2024. In 2025, two rounds of risk assessments of contractors were conducted, together with corresponding follow-up actions and communication and training activities to help ensure contractors' compliance with our human rights and ESG requirements.
- **Strengthened grievance mechanisms:** Awareness-raising and multi-channel access for community and worker grievance mechanisms were enhanced, including the introduction of local-language grievance channels and employee surveys conducted to assess effectiveness and fairness.
- **VPSHR implementation:** The *Principles on the Use of Non-Lethal Weapons* were issued and implemented in December 2024. Rolling training on arrest and detention was delivered, and KFM continued to participate in the regional VPSHR Working Group.

Governance and Operating Mechanisms for Ongoing HRDD

KFM regards ongoing HRDD as a management process embedded in day-to-day operations, rather than as a one-off assessment. The company engages in targeted communication with internal and external stakeholders involved in the HRAP to build consensus. Key governance and operating mechanisms include:

- **Accountability structure:** Overall responsibility for human rights governance and management is led by the Compliance Officer. A cross-functional ESG Working Group is responsible for driving implementation of the Human Rights Action Plan, with relevant functions—including HSE, Community, Human Resources, Security, Compliance, and Procurement and Contracts—accountable for issue-specific execution.
- **Oversight mechanisms:** KFM has implemented a multi-tier oversight framework through a combination of ESG Working Group meetings, contractor engagement mechanisms, targeted inspections and risk assessments, and third-party audits and certifications, including ISO certifications, RMAP audits, Copper Mark gap analysis, and ESG assurance.
- **Communication mechanisms:** Ongoing disclosure and consultation are carried out through union meetings, employee communication channels, contractor camp briefings, quarterly community meetings and consultation forums, and the VPSHR Working Group.
- **Annual updates:** KFM provides annual human rights progress updates and conducts site-level communication of key content in local languages.

Since October 2024, KFM has convened 15 monthly ESG meetings, during which functional departments have reviewed and reported on progress under the HRAP. CMOC's Vice President of ESG has also been involved in the management and oversight of KFM's HRAP, attending each monthly ESG meeting to monitor implementation and provide direction on progress.

KFM's HRDD process has also drawn on professional input and stakeholder feedback from the Copper Mark gap analysis, RMAP audits, and ISO certification auditors. In total, more than 300 internal and external stakeholders were interviewed as part of these assessments.

Salient Human Rights Issues and Progress

KFM has retained the salient issue framework from the 2024 HRDD and continues to focus on three core thematic areas:

- (1) workers' rights, including the rights of contractors' and suppliers' workers;
- (2) the rights of community members; and
- (3) security and human rights, including the VPSHR.

During the reporting period, KFM made progress in system development, policy implementation, and oversight tools. However, sustained attention and continued investment remain necessary across all three areas, particularly in relation to:

- inconsistency in working hours, remuneration, camp conditions, grievance mechanisms, and safety culture arising from the number and diversity of contractors;
- risks to surrounding communities associated with in-migration; and
- environmental issues—particularly water management—where community trust and participatory monitoring are required in addition to technical controls.

The human rights heat map below shows KFM's salient human rights issues as identified in 2024. These priority areas were assessed as having the highest likelihood and/or severity of adverse impacts on KFM's stakeholders. In 2025, the risk ratings for these issues were maintained, primarily because additional time is required to verify whether implementation of the HRAP has delivered sustained improvements.

Severity of potential impact on people →			Safe and healthy working conditions		
	Child and forced labour	Environment (water)		VPSHR risks (esp. related to theft and dog handling)	
			Community health and safety	In-migration* Contractor and supplier workers' rights	
	Resettlement Cultural heritage Freedom of association	Information and consultation Grievance mechanisms (worker and community)	Non-discrimination		
	Social investment		Just and favourable working conditions		
	Likelihood that impacts may occur →				

Notes on Human Rights Heat Map

- The heat map reflects the consensus reached on salient human rights issues at the time of assessment. As part of KFM's HRAP, the heat map should be periodically reviewed, validated, and updated.
- In discussions with employees and community members, the same rating was given for grievance mechanisms.
- The rating for in-migration was derived from the combined outcomes of discussions with employees, community members, and security personnel.

The following section provides a brief overview of KFM's salient human rights issues and progress in implementing ongoing human rights due diligence and related improvement measures during the period from October 2024 to December 2025.

1. Human Rights Governance and Management

KFM is transitioning from the construction phase to the operational phase, with management systems undergoing rapid consolidation. Without a clear governance structure, cross-functional coordination, and routine tracking mechanisms, human rights efforts risk becoming fragmented and project-based, making it difficult to establish a continuous improvement cycle. For KFM, governance capacity not only determines whether action plans can be effectively implemented, but also directly affects the credibility and consistency of external disclosures.

Recommendations from previous HRDD report:

- Articulate a clear commitment anchored in the UNGPs, and embed human rights due diligence into existing management systems—including HSE, environmental management, contractor management, community engagement, and grievance mechanisms—through coordinated cross-functional arrangements.
- Use annual updates, external assessments, and localized communication to ensure an integrated process of identification, action, tracking, and communication, and to progressively strengthen systematic processes.

Progress on implementation:

- KFM issued and launched the HRAP in December 2024 and integrated it into a cross-functional ESG Working Group mechanism, with overall coordination and oversight led by the Compliance Officer.
- Human rights considerations have been further embedded into external mechanisms, including ESG assurance, RMAP audits, and Copper Mark gap analysis, creating a combined pathway of internal integrated management and external verification.
- To improve on-the-ground implementation, KFM conducted site-level communication on the core elements of the HRAP through union meetings and community consultations at the end of 2024.

Next steps:

KFM will continue to operate the cross-functional and integrated approach to HRAP implementation, verify its effectiveness, establish annual human rights progress updates, and conduct localized, site-level communication.

2. Safe and Healthy Working Conditions

Mining operations are inherently high-risk. The expansion of the contractor workforce, increased workforce mobility, and a higher proportion of new workers have given rise to a number of key challenges in occupational health and safety, including maintaining a consistent safety culture, procedural compliance, and training coverage. The 2024 HRDD report identified this issue as the highest priority, emphasizing that the cost of incidents extends beyond physical harm to impacts on worker trust and the mine's social license to operate.

Recommendations from previous HRDD report:

- Pursue continuous improvement with ISO 45001 as the primary framework.
- Strengthen onboarding, refresher, and specialized training while expanding contractor coverage
- Use routine communications and grievance mechanism outreach to reinforce commitment to zero-retaliation policy, encourage workers to raise concerns, and reduce the risk of underreporting.
- Make fuller use of the HSE Committee in risk identification, joint oversight, and continuous improvement.

Progress on implementation:

- KFM obtained ISO 45001 certification in November 2024 and, as planned, conducted annual surveillance audits and system enhancement through December 2025.
- Health and safety training has been incorporated into onboarding, annual refresher, and specialized training programs, with the HSE and Human Resources functions maintaining ongoing oversight and improvement.
- In addition, KFM has used monthly HSE meetings to facilitate experience sharing and issue escalation, and has continued to track occupational health and safety issues through the Copper Mark gap analysis, promoting greater consistency and traceability across contractors and operating units.

Next steps:

- KFM will continue to consolidate management systems and strengthen contractor governance in order to improve training coverage and the effectiveness of site-level implementation.

3. Security and Human Rights

Because the boundaries of the mining concession can be effectively controlled and the risk of confrontation with ASM is relatively low, KFM's security-related human rights risks are concentrated in scenarios such as theft response, access control, detention and arrest, canine security, and contractor-led protests. These scenarios are highly sensitive, and an improper response can adversely affect personal safety, liberty, and dignity. In addition, the working conditions and disciplinary procedures for private security contractors are closely linked to the overall level of risk.

Recommendations from previous HRDD report:

- Align the Human Rights Action Plan with the VPSHR Action Plan to ensure the integration of training, procedures, and record-keeping.
- Continue to participate in the regional VPSHR Working Group to share practices and strengthen coordination.
- Enhance capacity-building and procedural controls for high-risk scenarios such as arrest and detention, canine security, and the use of non-lethal measures.
- Incorporate private security contractors into ESG monitoring, using a combination of oversight and capacity-building to reduce the likelihood of misconduct.

Progress on implementation:

- In December 2024, KFM issued and implemented the *Principles on the Use of Non-Lethal Weapons*, establishing a standard Code of Conduct and risk control requirements across key operational scenarios.
- Since May 2024, KFM has conducted rolling “Arrest and Detention” training sessions supported by TRA in order to expand coverage and strengthen practical capabilities.
- At the regional level, KFM has continued to participate in the monthly meetings of the Kolwezi VPSHR Working Group, which serves as a platform for external engagement and sharing good practices.
- In 2025, KFM expanded the scope of its contractor ESG risk management framework to include private security contractors, ensuring continuous monitoring and semi-annual risk assessments and updates.
- A number of security risk mitigation measures and procedural documents are also under development.

Next steps:

- KFM will continue to strengthen training and procedural measures under the VPSHR framework, and plans to finalize and issue relevant security policies by end-2025.

4. *Environment and Human Rights*

Local communities continue to raise concerns about water quality, water availability, and impacts on agricultural production. Meanwhile, growing external scrutiny of environmental issues in mining regions has underscored that trust is as important as technical controls. Even with robust management systems in place, communication that is overly technical or intermittent may give

rise to misunderstandings and information asymmetries, increasing the potential for disputes and human rights risks.

Recommendations from previous HRDD report:

- Continue to improve environmental management systems under the ISO 14001 certification framework; include water as a priority human rights issue in community engagement; and proactively explain environmental management and monitoring measures in clear, non-technical language;
- Explore community-based monitoring to establish a shared factual understanding of environmental issues;
- Where necessary, engage government authorities or credible third parties to jointly address perceived concerns, thereby reducing misunderstandings and enhancing trust.

Progress on implementation:

- KFM obtained ISO 14001 certification in November 2024 and completed its scheduled ISO 14001 surveillance audit in December 2025, confirming the continued effectiveness of the environmental management system.
- Environmental issues were incorporated into the Copper Mark gap analysis for continuous tracking, and water-related assessments are ongoing.
- To develop communication channels that are both participatory and accessible, KFM conducted its first community-based water sampling activity in May 2025, and has continued to communicate progress on environmental management and monitoring through quarterly meetings with community stakeholders.

Next steps:

- KFM will expand community-based monitoring and the use of clear, accessible communication channels to continue addressing community concerns and strengthen trust.

5. *In-Migration*

In-migration is a foreseeable external risk inherent in large-scale mining projects. It may lead to community conflicts, public security challenges, pressure on public health systems, and a heightened risk of gender-based violence, particularly affecting women and girls. It also intersects with security-related issues. The risk of in-migration typically extends beyond any single company's control; in the absence of multi-stakeholder coordination and continuous monitoring, cumulative impacts may become increasingly difficult to reverse.

Recommendations from previous HRDD report:

- Build on the existing *In-Migration Risk Management and Sustainability Strategy*, working with communities, traditional authorities, government bodies, NGOs, and neighboring mining companies to identify and mitigate risks related to in-migration.
- Ensure the involvement of security stakeholders in planning and preventive measures to manage potential conflicts at an early stage.
- Explore more consistent, regional development strategies to enhance the company's available leverage and strengthen governance measures to address in-migration .

Progress on implementation:

- KFM communicates and exchanges information with communities, NGOs, and industry peers through platforms such as quarterly community meetings and the VPSHR Working Group, and addresses the risks of in-migration as a standing agenda item across these platforms for preventive discussion.
- In addition, while the latest Copper Mark gap assessment did not identify new recommendations specifically on in-migration, KFM continues to treat in-migration as a strategic risk area and tracks related issues through its existing risk management framework and ongoing stakeholder engagement mechanisms, informed by earlier Copper Mark auditor feedback.

Next steps:

- KFM will continue to promote coordination with government authorities and industry peers and strengthen joint prevention measures with security-related stakeholders in order to reduce the impacts of external risks on communities and vulnerable groups.

6. Contractor and Supplier Labor Rights

Working hours, remuneration, camp conditions, and access to communication and grievance mechanisms for contractor workers are the most prevalent and recurrent labor rights risks within the mining sector. As the number of contractors and camps expand, the absence of risk-based prioritization, continuous oversight, and closed-loop remedial measures can allow isolated issues to spread and escalate, adversely affecting KFM's overall human rights performance and community perceptions of the company.

Recommendations from previous HRDD report:

- Further institutionalize contractor ESG monitoring and corresponding KPIs through regular risk assessments and tracking of remedial measures, supported by incentive and disciplinary mechanisms to promote continuous improvement.
- Strengthen capacity-building and apply more targeted management measures to higher-risk contractors.
- Continue to provide contractor workers with access to KFM's grievance mechanisms until contractors have established their own effective mechanisms, and strengthen communication using a zero-retaliation and remedy-oriented approach.

Progress on implementation:

- In October 2024, KFM updated the *Contractor ESG Risk Management Implementation Guidelines*; a new version was issued in December 2025 based on site-level implementation outcomes. Over the course of 2025, KFM conducted two semiannual contractor ESG risk assessments, each comprising a formal assessment followed by a review of remedial measures. In addition to interviews with contractor management, a total of 229 interviews were conducted with frontline workers to verify working conditions and consistency in implementation.
- The primary risks identified during the year were concentrated in remuneration-related issues and the transparency and accessibility of grievance mechanisms. In response to the assessment results, KFM introduced rolling monthly reviews of labor practices and organized induction training and semi-annual refresher sessions for contractor management in order to strengthen awareness of compliance and improve consistency in on-site implementation.
- In June 2025, KFM installed complaint boxes at contractor camps and provided additional training and communication on grievance mechanisms in order to improve accessibility and use of worker grievance channels.
- In terms of remediation outcomes, 100% of contractors identified as presenting material risks implemented remedial measures over the course of the year. In addition, the overall risk profile improved, evidenced by the elimination of material risks, a significant reduction in the number of high-risk contractors, and the first instance of contractors assessed as low risk. Overall contractor compliance levels improved further compared with the previous year.

Next steps:

- KFM will continue to strengthen ESG risk management for contractors, reinforce closed-loop remediation and training, and promote the establishment of contractor-managed grievance mechanisms.

7. *Elimination of Child and Forced Labor*

Child and forced labor constitute highly sensitive issues in international supply chain due diligence, characterized by a zero-tolerance approach and significant spillover effects. While KFM's ASM-related risks remain relatively low and no material indications have been identified on-site, ongoing identification and preventive measures are still required for contractors and lower tiers of the supply chain in order to meet international standards and customer expectations.

Recommendations from previous HRDD report:

- Continue to include child and forced labor in periodic risk assessments of contractors and suppliers.
- Explore risk identification and response pathways beyond Tier 1 suppliers, particularly by encouraging higher-risk contractors to identify and manage risks related to second-tier subcontractors and sub-suppliers.
- Monitor opportunities for regional collaboration in Kolwezi in order to address child labor risks associated with ASM and strengthen collective governance capacity within the mining industry.

Progress on implementation:

- Since June 2024, KFM has conducted rolling inspections of contractors and integrated requirements on the prevention of child and forced labor into contractor management systems through a combination of policy development, oversight, and remedial measures. These requirements have been incorporated into the company's continuous monitoring and risk assessment framework, enabling routine risk identification, issue remediation, and follow-up.
- In addition, KFM has launched a number of community development initiatives aimed at addressing the root causes of child labor, including investments in school infrastructure, vocational skills training, and scholarships.

Next steps:

- KFM will continue to explore risk identification and response pathways extending beyond Tier 1 suppliers in line with supply chain due diligence requirements, while also monitoring opportunities for collaborative governance at the regional level.

8. Community Health and Safety

Community health and safety concerns are most frequently related to road safety, dust and traffic-related health risks, as well as the capacity of community infrastructure and health services. As operational activities and traffic volumes increase, the absence of continuous monitoring and communication may significantly amplify impacts and sensitivity if a serious traffic accident occurs, particularly if children are involved.

Recommendations from previous HRDD report:

- Continue to implement road safety measures and monitor contractor compliance, while strengthening risk identification and baseline data collection.
- Where necessary, carry out road safety awareness and education activities targeted at children.
- Explore community participation in air and environmental monitoring to better respond to dust- and health-related concerns, reduce disputes, and enhance shared governance capacity.

Progress on implementation:

- KFM has incorporated community health and safety considerations into the implementation and tracking of community development and social responsibility (*Cahier des Charges*) projects. In 2025, these projects encompassed the expansion of hospitals and health centers, support for childhood vaccination programs, and prenatal health screenings, with the aim of strengthening baseline public health and healthcare service capacity in neighboring communities. In March 2025, KFM provided medication, clean drinking water, and other emergency assistance to help communities effectively contain the risk of a cholera outbreak.
- As part of KFM's continuous improvement efforts, the Copper Mark gap analysis continues to track community health and safety measures in order to improve road safety governance, including the installation of additional traffic signage on community roads, routine water spraying for dust suppression, and road safety training to the on-site drivers.

Next steps:

- Through a combination of community-based monitoring and engagement on priority issues, KFM will continue to mitigate traffic- and dust-related risks and improve collaboration with local communities.

9. *Non-Discrimination and Inclusion*

The 2024 HRDD report identified challenges related to the integration and communication between Chinese and DRC employees as recurring issues raised by multiple stakeholders. These challenges have implications for workplace dignity and perceptions of fairness, and are also closely linked to effective collaboration on occupational safety. At the same time, gender equality, anti-harassment, and the protection of vulnerable groups are areas that require long-term investment within the context of a mining workforce. In the absence of adequate institutional frameworks and capacity-building support, related grievances may accumulate in the absence of effective communication and remediation, potentially escalating into complaints or conflicts.

Recommendations from previous HRDD report:

- Accelerate the implementation of integration strategies by strengthening mutual understanding through language training, cross-cultural awareness activities, and visible leadership.
- Incorporate anti-discrimination and anti-harassment requirements into contractor governance, while also promoting gender equality and the protection of vulnerable groups.
- Ensure that personnel responsible for grievance mechanisms have the capacity to handle sensitive complaints in order to enhance credibility and the effectiveness of remedies.

Progress on implementation:

- In accordance with the company's existing *Gender Equality Policy*, KFM established a Women's Committee in August 2024 to advance initiatives related to gender equality and women's development, and incorporated related requirements into the contractor ESG management framework.
- Personnel responsible for grievance mechanisms have participated in training on the UNGPs, the VPSHR, and other topics to continuously strengthen their capacity to identify and address sensitive issues such as discrimination and harassment. Supporting policies and action plans are currently under development as part of ongoing implementation efforts.
- To support integration between Congolese and Chinese colleagues, KFM strengthened inclusive internal communication and interaction initiatives, including launching a local-language edition of its monthly internal culture newsletter (*MY KFM*) and organizing site activities (e.g., a football tournament and International Women's Day events) to encourage mixed-team engagement and a more cohesive workplace culture.

Next steps:

- In early 2026, KFM plans to issue and implement a Women's Development Promotion Plan as well as related policies and actions for the protection of vulnerable groups, while continuing to institutionalize integration initiatives.

10. Information and Consultation

For issues such as the environment, water, in-migration, and community projects, insufficient information or fragmented communication can readily give rise to misunderstandings and amplify risks. For communities, access to information, clarity of communication, and the ability to receive feedback directly affect trust in the company and willingness to engage, and are a key element of the “stakeholder engagement” component in ongoing human rights due diligence.

Recommendations from previous HRDD report:

- Strengthen the stakeholder mapping and engagement plan, ensure adequate consultation prior to the implementation of key actions, and provide sufficient resources to Community Liaison Officers (CLOs).
- Maintain continuous and accessible communication on priority issues, incorporating feedback mechanisms and paying particular attention to the participation of women and other vulnerable groups to improve inclusiveness and representation.

Progress on implementation:

- KFM has clearly defined the roles and responsibilities of Community Liaison Officers (CLOs) within its dedicated community engagement team. Mechanisms such as quarterly community meetings and monthly meetings of the VPSHR Working Group continue to operate and are used to facilitate ongoing communication on priority issues and to track progress on actions.
- Updates to stakeholder engagement procedures and stakeholder mapping are currently underway. Informed by the Copper Mark gap assessment, KFM is expanding stakeholder categories and coverage and ensuring stakeholders linked to emerging risks are included; this priority has been captured in the Copper Mark corrective action plan and is being tracked.

Next steps:

- KFM will continue to refine and institutionalize its communication procedures and stakeholder mapping in order to enhance the consistency, transparency, and inclusiveness of stakeholder engagement.

11. Grievance Mechanisms

The value of grievance mechanisms lies in their ability to provide accessible, trusted, and remedy-oriented channels through which concerns can be raised and addressed at an early stage. The 2024 HRDD report noted that contractor workers may refrain from using grievance mechanisms due to fear of retaliation or difficulties in providing written submissions; as a result, multilingual

access points, ease of access, and continuous feedback are particularly critical to ensuring that mechanisms function effectively.

Recommendations from previous HRDD report:

- Further expand access to multi-channel grievance mechanisms, strengthen communication on the zero-retaliation commitment, and explore more accessible access points in the local language (such as toll-free hotlines and multilingual channels).
- Continue to provide contractor workers with access to KFM's grievance mechanisms until such time that contractors have their own effective mechanisms.
- Build trust in grievance mechanisms through regular feedback and enhanced transparency, and continue to strengthen independent mediation capacity to improve the effectiveness of community dispute resolution.

Progress on implementation:

- KFM has continued to promote its grievance channels through training, internal communications, and community engagement, including the introduction of a Swahili and Lingala language hotline.
- Additional complaint boxes have been installed at contractor camps, supported by enhanced outreach to improve accessibility.
- In October 2024, KFM launched a questionnaire-based assessment to determine the effectiveness of its grievance mechanisms and developed a corresponding improvement plan. A new annual assessment was initiated as scheduled in October 2025 and is currently underway.

Next steps:

- KFM plans to complete the integration of grievance channels and publish related policy documents by the end of 2025, while continuing to align site-level grievance mechanisms with the effectiveness criteria of the UNGPs in order to enhance transparency, effectiveness, and credibility.

12. Land Acquisition and Livelihood Restoration

Land acquisition and resettlement can have multidimensional and long-lasting impacts on affected people. As a result, even for projects of limited scale, it is important to demonstrate the effectiveness of remedies through alignment with international standards and third-party monitoring. For KFM, feedback from past projects has been generally positive, but continued monitoring and readiness for future scenarios are important in order to maintain the social license to operate and reduce potential uncertainty.

Recommendations from previous HRDD report:

- Continue to support land acquisition committees and independent mediation mechanisms, and conduct expert monitoring to verify livelihood restoration outcomes.
- Monitor external factors such as inflation and, where necessary, assess the need to update compensation standards.
- Ensure alignment with international standards prior to any potential future land acquisition activities.

Progress on implementation:

- During the reporting period, KFM undertook no new land acquisition or resettlement activities.
- A third-party audit of the Resettlement Action Plan (RAP) was launched as scheduled in October 2025 and is expected to generate forward-looking recommendations to support continuous improvement and readiness for potential future scenarios.

Next steps:

- Based on the recommendations of the third-party audit, KFM will continue to strengthen monitoring and institutional preparedness to ensure timely alignment with international standards, should future needs for additional land acquisition and resettlement arise.

13. Cultural Heritage

Cultural heritage risks are characterized by the fact that adverse impacts are typically irreversible, making early identification, procedural controls, and community collaboration essential to mitigating risk. Even in the absence of new land acquisition activities, construction and operational activities may still result in chance finds, underscoring the importance of maintaining effective procedures.

Recommendations from previous HRDD report:

- Continue to conduct cultural heritage surveys and strictly implement chance find procedures, incorporating relevant requirements into contractor construction management.
- Where cultural landmarks or sacred sites are identified, coordinate with communities and government authorities to adopt appropriate protection measures aimed at respecting cultural rights and safeguarding the company's social license to operate.

Progress on implementation:

- During the reporting period, in the absence of any new land acquisition or resettlement activities, KFM continued to introduce procedural controls to operationalize requirements governing the protection of cultural heritage, while also tracking and benchmarking performance in accordance with Copper Mark requirements.

Next steps:

- KFM will continue to strengthen the consistent implementation of chance find procedures and expand contractor coverage to maintain an effective closed loop mechanism for identification, protection, and communication.

14. Freedom of Association

Effective freedom of association and collective bargaining help to reduce the risk of labor disputes and provide a stable framework for dialogue on improvements in wages and benefits, disciplinary procedures, and working conditions. For KFM, which is currently in the operational ramp-up phase, ensuring that dialogue mechanisms are predictable, traceable, and supported by closed-loop processes is essential to maintaining stable labor relations and supporting continuous improvement.

Recommendations from previous HRDD report:

- Maintain routine dialogue under the collective agreement framework, and reinforce the use of meeting minutes and ongoing tracking of actions.
- Explore more accessible ways to communicate workers' rights and obligations in order to enhance transparency and consistency in the application of rules.
- Monitor contractor worker representation arrangements and encourage contractor management to respect and utilize dialogue mechanisms.

Progress on implementation:

- KFM updated and signed the latest version of the collective agreement in September 2024.
- Union representative meetings continue to be held on a quarterly basis and function as a key platform for tracking and resolving issues.
- Requirements to establish contractor worker representation mechanisms have been incorporated into monthly rolling reviews of contractor labor practices and semiannual ESG risk assessments.
- In addition, the Copper Mark gap analysis identified improvement priorities for freedom of association, including enhanced risk review, stronger leadership involvement in union dialogue, and more robust documentation; these have been included in the corrective action plan and are being tracked.

Next steps:

KFM will continue to reinforce dialogue and closed-loop follow-up mechanisms within the collective agreement framework, while also improving the localization and accessibility of rights awareness initiatives for both employees and contractor workers.

15. Just and Favorable Working Conditions

Living wages, compliance with working time requirements, and fatigue management remain key areas of international focus, with contractor coverage and consistent on-site implementation presenting additional challenges. In addition, procedural safeguards and transparent communication in disciplinary processes play a significant role in shaping workers' perceptions of fairness. As KFM enters the operational ramp-up phase, workers' expectations of remuneration, benefits, and working arrangements continue to rise, underscoring the need to advance these issues through clear baselines, targets, and roadmaps that enable verifiable progress.

Recommendations from previous HRDD report:

- Establish a living wage baseline and corresponding improvement targets, and explore regionally coordinated, shared methodologies.
- Review shift patterns and transportation arrangements to reduce fatigue-related risks.
- Strengthen procedural safeguards, training, and communication around disciplinary procedures to ensure fairness, consistency, and clarity in the application of rules.
- Reduce systemic risks through ongoing contractor oversight and closed-loop corrective action.

Progress on implementation:

- In August 2024, KFM conducted an industry wage survey and updated its benchmarking analysis. Based on these findings, KFM completed an internal living wage assessment in September 2025 in accordance with the internationally recognized Anker methodology, and is using the results to revise its remuneration structure and develop a compliance roadmap.
- Contractor working and living conditions are subject to ongoing management through monthly coaching and inspections, semi-annual risk assessments, and corrective action mechanisms.
- In addition, the Copper Mark gap analysis highlighted priorities on evidence-based working time/fatigue controls, demonstrating pay equity and living wage implementation across different workforce groups, and consistent contractor camp standards; these have been included in the corrective action plan and are being tracked.

Next steps:

KFM will continue to implement the living wage baseline, targets, and roadmap, while also exploring options to extend their application to contractors.

16. Social Investment

In regions with inadequate public service provision and high levels of poverty, social investment serves as a key source of positive impact, but is also accompanied by secondary risks related to expectation management, equitable distribution, and insufficient coordination. In addition, immigration may dilute benefits and exacerbate intra-community tensions. Therefore, to ensure social investment projects are effective and deliver long-term impact, they must be underpinned by participatory governance and transparent accountability mechanisms.

Recommendations from previous HRDD report:

- Build on the *Cahier des Charges* and leverage local development/monitoring committees to support participatory implementation and oversight, with a particular focus on women and vulnerable groups in order to enhance a rights-based approach.
- Work with government authorities and industry peers to enhance transparency and accountability in the use of resources, reduce the risks of duplicative initiatives and misalignment, and generate more robust long-term benefits in capacity building and local employment.

Progress on implementation:

- Under the five-year *Cahier des Charges* issued by KFM in 2023, a total of approximately US\$8 million has been allocated to community development in areas surrounding the mining site.
- Local Monitoring Committees (CLS) continue to conduct annual monitoring of *Cahier des Charges* projects and have given positive assessments.
- In addition, KFM contributes 0.3 percent of revenue to the community fund, which is managed by a dedicated body composed of representatives from the national government, local authorities, communities, and NGOs. This body plans and implements community development projects focused on infrastructure, health and education, and agriculture. To date, the fund has disbursed approximately USD 10 million.
- In addition, in 2025 KFM launched a number of community capacity-building programs, including the *Elite Scholarship Program*, which allows select young members of the community to pursue their studies in China, with the objective of strengthening the local workforce and creating shared value.

Next steps:

KFM will continue to prioritize participatory implementation and oversight, strengthen transparent communication and coordination, and enhance the sustainability of social investment impacts while mitigating secondary risks.

Key Challenges

As KFM moves into the production ramp-up phase, the focus of its human rights due diligence has shifted from establishing frameworks to operating systems and enhancing consistency in execution. Whereas previous challenges were largely related to gaps in policy, the principal challenges during the ramp-up stage include ensuring consistent execution across departments, contractors, and operational scenarios, as well as maintaining transparent communication and continuous improvement in the face of external uncertainty. Based on action plan implementation progress and external feedback, KFM's key challenges are currently concentrated in the following three areas.

First, the systemic challenges associated with contractor management continue to require sustained investment and iterative improvement. Such challenges cannot typically be resolved through one-off corrective actions; rather, they require a long-term approach comprising risk-based prioritization, training and communication, on-site supervision, and ongoing remediation, in order to establish a sustainable process of continuous improvement.

Second, in-migration presents external risks that involve multiple stakeholders and lie beyond the company's sole control. Increased population mobility and concentration may exacerbate

intra-community tensions, public security challenges, and risks to vulnerable groups. It also intersects with security-related issues. In addition, in-migration may dilute the effectiveness of local employment and social investment outcomes, as well as increasing stakeholder expectations and pressure on the company. While the company can play a coordinating role, meaningful mitigation ultimately requires stronger government engagement, industry collaboration, and enhanced community governance, particularly by establishing more stable coordination mechanisms in areas such as rule enforcement, public service provision, and joint prevention.

Third, trust in environmental management remains a critical variable in reducing environment-related human rights risks. Even with continuous improvements in technical management systems and the timely implementation of monitoring and assessment activities, community perceptions of water quality, water availability, and impacts on agricultural production may still be amplified by information asymmetries, overly technical or intermittent communication, creating the potential for misunderstandings and disputes. For KFM, the challenge in the next phase lies not only in effective implementation, but also in ensuring that environmental management measures are visible, understandable, and inclusive for stakeholders. This requires participatory monitoring, as well as more accessible means of communication in order to establish a shared factual basis and progressively build trust.

Forward-Looking Statement

Within its human rights governance framework, KFM will continue to operate the ongoing management mechanism set out in the *Human Rights Action Plan*, embedding cross-departmental coordination, routine tracking, and the use of external mechanisms into regular operations. In addition, the company will combine on-site engagement with localized communication to ensure that the priorities, progress, and improvement pathways of the *Human Rights Action Plan* are more broadly and accurately understood and effectively monitored.

In contractor management, KFM will further strengthen ESG risk assessments and closed-loop remediation for contractors. Through more targeted training and communication, as well as continuous oversight, KFM will continue to build contractor capacity and drive improvements in contractor performance in the areas of health, safety, and human rights.

With respect to in-migration, KFM will continue to implement its existing *In-Migration Risk Management and Sustainable Development Strategy* and maintain routine risk identification and information-sharing through platforms such as quarterly community meetings, engagement with local government authorities and traditional leaders, and the regional VPSHR Working Group. In addition, the company will enhance monitoring and preventive measures related to public security, community tensions, and risks to vulnerable groups, as well as promote collaborative mechanisms with government authorities, industry peers, and civil society organizations to mitigate the external impacts of in-migration on community governance and social investment outcomes.

To address environmental and water-related issues, KFM will use a combination of technical measures and trust-building initiatives aimed at expanding participatory monitoring and accessible communication. Through continued engagement with community concerns, the company aims to establish a shared factual basis and interpretive framework, thereby reducing environment-related human rights risks while strengthening long-term mutual trust with communities and enhancing the resilience of community partnerships.