

Human Rights Policy

INTRODUCTION

Xanadu is committed to respecting the Human Rights of all stakeholders and the laws of the countries in which we operate. We seek to prevent or mitigate any negative impacts of our activities, and maximise our positive impacts, including in relation to Human Rights, and to ensure that our operations do not contribute to conflict. This commitment is fundamental to acting in accordance with Xanadu's values.

SCOPE

This policy applies to all Xanadu directors, employees and contractors.

COMMITMENTS

Xanadu Mines will:

- Respect Human Rights in its operations, seek to use its leverage to encourage respect for Human Rights in its business relationships, and engage in dialogue with stakeholders to promote Human Rights;
- Recognise and respect the cultural values, traditions and beliefs of the communities where it operates, including Indigenous Peoples;
- Establish and implement security operations that are consistent with international standards and norms for dealing with security and human rights;
- Respect the rights of employees and contractors including freedom of association and collective bargaining, and ensure workforce wages of at least the national minimum wage;
- Strive to ensure a direct, honest and open relationship with employees and contractors that is built on mutual trust, and respect for the dignity and worth of each individual;
- Not engage in or condone forced or compulsory labour, other forms of modern slavery or child labour, and work to ensure that these are not present in Xanadu's supply chain;
- Work to assess, and take appropriate action regarding, the Human Rights risks in its operations and supply chain through ongoing human rights due diligence processes;
- Maintain effective grievance mechanisms for stakeholders to raise complaints or concerns and, where it identifies that it has caused or contributed to an adverse human rights impact, provide for or cooperate in its remediation through legitimate processes;
- Comply with the laws of the countries where we operate, and where conflicts exist between this policy and local laws, comply with local laws while seeking to meet the commitments in this policy as far as possible;
- Evaluate the effectiveness of its Human Rights approach and promote continuous improvement; and
- Communicate this Policy and its expectations in relation to Human Rights to relevant stakeholders (including directors, employees, contractors, suppliers, non-managed sites and joint venture partners).