

MALABAR RESOURCES LIMITED

HUMAN RIGHTS POLICY

JULY 2021

OUR COMMITMENT

Malabar Resources Limited (“Malabar”) is committed to respecting and upholding the human rights of all people including our employees, the communities in which we operate, those within our supply chains and those who may be affected by our operations. Malabar’s Human Rights Policy (“the Policy”) incorporates the international human rights principles contained in the Universal Declaration of Human Rights, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, and the United Nations (UN) Guiding Principles on Business and Human Rights.

This policy applies to Malabar and its subsidiaries, partnerships, ventures, and other business associations that are effectively controlled, directly or indirectly, by Malabar (collectively the “Company”), as well as all directors, officers, and employees of the Company.

We work to avoid health and safety risks and impacts to employees and the communities in which we operate through the application of our robust risk management processes.

We respect freedom of association, the right to a fair wage and ensure that all employees are treated fairly and without discrimination.

OUR STRATEGY

Malabar will aim to achieve its commitment to human rights by:

- Working to align our business operations and practices with the UN Guiding Principles on Business and Human Rights;
- Operating in compliance with the requirements set out in the *Modern Slavery Act 2018* (Cth);
- Treating our employees equitably, without harassment or discrimination, and promoting workplace diversity;
- Engaging in ways that are culturally appropriate, paying special respect and attention to Indigenous Peoples rights and interests;
- Recognising our employees’ rights to freedom of association, the right to a fair wage and to ensure that all employees are treated fairly and without discrimination;
- Actively taking actions and conducting a range of risk assessments to facilitate the prevention of work-related risks and health hazards;
- Rejecting all forms of slavery, forced and child labour, and working to eliminate these practises from our business and supply chain so far as is reasonably practicable;

- Undertaking risk assessments of our own operations and those of our suppliers, with an emphasis on minimising higher risk actions and activities as much as possible;
- Conducting sufficient due diligence in order to avoid knowingly engaging in business operations that may be involved in human rights violations, including the requirements under the *Modern Slavery Act 2018* (Cth);
- Communicating our expectations and requirements in relation to human rights to our suppliers and partners, and;
- Taking prompt and appropriate action in the event that Malabar discovers it is (or may be) associated with human rights violations.

Respect for human rights is established and promoted through corporate policies established by Malabar that can be viewed on the website <https://malabarresources.com.au/about-us/corporate-governance>.

RESPONSIBILITY

All Malabar employees, suppliers, contractors, consultants, and other business partners are expected to read, understand, and adhere to this Policy.

The Malabar Board of Directors will periodically review the effectiveness of Malabar’s Human Rights Policy to ensure it remains relevant to the needs of Malabar and its stakeholders.

REPORTING AND COMPLIANCE

All concerns will be promptly and confidentially investigated and resolved. We prioritise the provision of an effective remedy wherever human rights violations occur. We are committed to developing our management’s capacity to effectively identify and respond to these concerns as well as developing an awareness for our employees on human rights.

Suspected or actual breaches of this policy should be reported to your manager, or a member of the Company’s Executive leadership, or through the Whistleblower Policy which facilitates anonymous reporting to external parties.

Any questions can be directed to the Company Secretary, admin@malabarresources.com.au.

DOCUMENT CONTROL

Version	Date	Owner	Description of changes
V1	29/07/2021	Company Secretary	