

SOCIAL RESPONSIBILITY POLICY

1. PURPOSE

- 1.1 Capital Limited (“the Company”)’s Social Responsibility Policy (“Policy”) sets out our commitment to social responsibility, encompassing land use, community health and safety, cultural heritage, stakeholder engagement, grievance management, and our efforts to create and maintain mutually beneficial and respectful relationships with our host communities.
- 1.2 This Policy reflects our intent to set measurable objectives and targets that will drive continual improvement in social performance, including measures to avoid adverse impacts and enhance opportunities.
- 1.3 This Policy underpins our *purpose*: to deliver safe, professional and reliable services and solutions to our customers, while providing solid long-term returns to our investors;and reflects our *values*: **People, Integrity, and Quality**.

2. SCOPE AND APPLICATION

- 2.1 This Policy applies to all Capital activities and representatives, including without limitation:
 - a. directors, employees and any third-party workers, business partners or visitors (collectively, “Responsible Persons”) of Capital’s business and operations; and
 - b. all sites, all business activities, from the exploration phase through to producing mine sites together with laboratories.
3. where Capital is undertaking activities at a client’s operation, site or premisses, then this policy should be read in conjunction with the clients policy. **RESPONSIBILITIES**
- 3.1 Our Board of Directors, with technical guidance from the Sustainability Committee, are responsible for providing the strategic direction for effective social management and to review the performance of the Company. The implementation of this Policy is the joint responsibility of the Executive and respective operational-level managers.
- 3.2 All Responsible Persons are required to uphold Company values and have a duty of care to:
 - a. Comply with applicable legal requirements, the Company’s policies, management standards and critical hazard controls;
 - b. Report all hazards, risks and incidents; and
 - c. Co-operate with co-workers, supervisors and managers on these matters and identify areas for improvement.

4. POLICY STATEMENT

4.1 In collaboration with our clients, Capital commits to:

- a. Maintain a robust social management system for community engagement and relations, and the management of social risks, impacts and opportunities
- b. Comply as a minimum with all applicable legal and regulatory social requirements of the countries in which we operate, and where such legislation or requirements are lacking or absent, apply an internationally recognised standard.
- c. Regularly assess social risks and impacts that exist across the business and implement risk- based mitigation and monitoring program to improve performance.
- d. Ensure that social impact assessments undertaken by clients are accessible to affected communities and include plans to avoid, minimize, mitigate or compensate for significant adverse impacts.
- e. Listen to and engage with stakeholders to better understand their interests and concerns and integrate this knowledge into how we do business. Where clients lead community engagement, we will endeavour to gain feedback and insight through client engagement.
- f. Establish fair and effective mechanisms through which complaints and grievances related to our activities can be raised, resolved and remedies implemented. Where clients have a complaints and grievance mechanism in place, we will work hand in hand to understand, manage and monitor any complaints or grievances relevant to our activities.
- g. Identify and eliminate or minimise significant risks to the health and safety of local people due to our activities. We will develop, maintain and test emergency response plans, ensuring communication to, and involvement of, potentially affected stakeholders. Where our client's emergency response plan includes our activities, we will provide relevant information and support for their planning.
- h. Respect the human rights of our workforce, affected communities and all those people with whom we interact. Our commitments on human rights are detailed in our Human Rights Policy. We will be alert to the risk of differential negative impacts to vulnerable or marginalized groups.
- i. In conjunction with our clients', ensure that the communities associated with the operations are offered meaningful opportunities to benefit from our presence, including through access to jobs and training, procurement opportunities for local business and social investment.
- j. Seek to obtain and sustain the broad-based support of communities affected by our activities through informed consultation and participation.
- k. In conjunction with our clients, respect the individual and collective rights and interests of Indigenous Peoples.
- l. In conjunction with our clients, seek to preserve and protect cultural heritage



from adverse impacts associated with our activities. We will support our clients to adopt the management measures approved in the social impact assessments/environmental and social management plan. If our activities are located where cultural heritage is expected to be found, we will follow our clients chance find procedure or alternatively develop a site-specific chance find procedure considering local legislation.

- m. Seek commitment from our clients to avoid involuntary resettlement.
- n. Regularly review our social performance relative to our policies and management standards and implement corrective action plans as appropriate with the aim of continual improvement.
- o. Be guided by ISO 26000 Social Responsibility and ISO 27000 Information Security.
- p. Publicly communicate our social performance as an integral part of our annual sustainability disclosures in the Sustainability section of the Annual Report & Accounts.

5. EVALUATION

- 5.1 This Policy will be reviewed and revised annually, to ensure it remains current with business needs. Any changes to the Policy will be presented to the Sustainability Committee for review and the subsequent approval of the Board.
- 5.2 This Policy was approved by the Board on 24 March 2025.

Jamie Boyton
Executive Chair