

HUMAN RIGHTS POLICY

Polymetal International plc (together with its subsidiaries — 'Polymetal' or the 'Company') undertakes a responsibility to respect human rights of all stakeholders in the course of its business operations and decision-making processes.

Polymetal's Human Rights Policy has been informed by the principles as set forth in the following standards:

- Universal Declaration on Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;

This Policy should be read in conjunction with Polymetal's Code of Conduct, Health and Safety, Anti-Bribery and Corruption Policies, and other appropriate policies and procedures.

To meet the responsibilities to respect human rights, Polymetal will:

- engage in dialogue with stakeholders to promote human rights;
- respect human rights and preserve cultural heritage of the indigenous communities in areas where the company operates;
- not discriminate against any individual on the basis of race, gender, age, religious beliefs, ethnicity, social status, sexual orientation or any other characteristic unrelated to the individual's job performance;
- apply human rights policy rigorously to all of its employees and secure recognition and observance by every individual within the company in respect of fellow employees and business partners;
- ensure safe and healthy working environment; support the elimination of all forms of child, forced and compulsory labour, recognise the freedom of association and freedom of expression and respect human dignity;



- work towards implementation of this Policy throughout company's operations and continually monitor and evaluate evolving human rights conditions in the jurisdictions in which Polymetal operates and update guiding principles to reflect this;
- provide adequate grievance mechanisms to receive, assess and respond to human rights complaints or queries from any stakeholder without any prejudice to the aggrieved person(s). Where a human rights violation is detected, Polymetal will work to provide appropriate remedies and take measures to ensure mechanism's effectiveness and continual improvement.
- communicate the Policy to all stakeholders and encourage human rights training for all relevant staff;
- inform its stakeholders regarding performance related to human rights protection through annual sustainability reporting process and other engagement mechanisms;
- seek to influence its partners, contractors and suppliers to apply the same rigorous standards;
- ensure that slavery and human trafficking is not taking place in its supply chains or in any part of its business.

The responsibility for overseeing the Policy's implementation, reviewing the management reports on potential human rights issues, and advising on measures to avoid infringing of human rights is delegated to the Safety and Sustainability Committee of the Board of Directors (the 'Committee').

This policy is subject to annual review by the Committee to consider if it remains appropriate for the needs of the Company and recommend any changes it considers desirable to the Board for approval.