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PRINCIPLES



MMG Limited

# Voluntary Principles Initiative Full Report 2024



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**progress**



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MMG Limited ("MMG," "the Company") was accepted as a full member of the Voluntary Principles Initiative (VPI) in May 2022. This report is the Company's fifth VPI report, covering the period from 1 January to 31 December 2024.

On 22 March 2024, MMG acquired the Khoemacau Copper Mine in Botswana. While work is underway to align the operation with the VPSHR, Khoemacau has not been included in this report.





# A

## Commitment to the Voluntary Principles





# Commitment to the Voluntary Principles Continued

## 1. Public commitment and endorsement

### Commitment and endorsement

Implementing the Voluntary Principles on Security and Human Rights (VPSHR) is important to MMG throughout its global portfolio, with a particular focus on identifying and managing risks in the Democratic Republic of the Congo (DRC) and Peru. MMG is committed to increasing awareness of the intent of the Voluntary Principles Initiative (VPI), as well as recognition and respect for human rights across all our people and asset protection activities. We operate in accordance with the VPSHR, as well as the rules of engagement, and the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.

MMG has issued a public statement on its corporate website stating its affiliation and engaged membership with the VPI and has also endorsed the VPI through the MMG Human Rights Policy (both available [here](#)). Our Human Rights Policy is aligned with the UN Guiding Principles on Business and Human Rights and the principles of the UN Global Compact.

In 2024, we highlighted our involvement in the VPI as full member at our annual results presentation and our sustainability briefing, as well as on our corporate and sustainability website [wemineforprogress.com](http://wemineforprogress.com). We also include information about our VPSHR alignment and work in both the Sustainability Report and the Modern Slavery Statement.

We also assisted in the VPI Plenary in 2024, with senior MMG management present to participate in the various dialogues and working group meetings.

VPI awareness and promotion as well as potential human rights risk analysis across the business continue to be reviewed as part of MMG's Code of Conduct and People Committee's charter.

We have standardised our site security management plans (SMPs), and these plans align with the VPSHR in relation to the deployment and conduct of public and private security. We also ensure that public security forces supporting our sites are adequately trained in the use and application of the VPSHR.

MMG regularly engages in Pillar meetings, in-country meetings and dialogue with other members to support the implementation of the VPSHR and has committed to providing timely responses to requests for information related to the implementation of the VPSHR as required. Our participation in 2024 included verification presentations, Pillar meetings, participation in the strategic review of the VPI as well as online participation in some of the VPI Plenary meetings.

### Transparency

MMG supports transparency while respecting commercial in-confidence matters. MMG's corporate philosophy is underpinned by the International Council on Mining and Metals' (ICMM) Mining Principles, of which we are a member, and the Extractive Industries Transparency Initiative (EITI). Being listed on the Hong Kong Stock Exchange, MMG is required (under the Hong Kong Listing Rules) to produce a report on the Company's environmental, social and governance (ESG), and business performance. Our ESG report is published annually in MMG's Annual Report. Our annual Sustainability Report is prepared with reference to the Global Reporting Initiatives' (GRI) 2021 Sustainability Reporting Guidelines. This report is externally assured as guided by the ICMM's 'Sustainable Development Framework: Assurance Procedure' and details MMG's approach to sustainability across our business and at each operation.

Our approach to security and human rights is communicated in several ways:

- MMG reports on any serious circumstances, where market notification is necessary through public statements and tailored management plans.
- MMG reports on its approach to the management of security and human rights internally and through the company-wide grievance mechanisms in MMG's sustainability reports. View MMG Sustainability Reports [here](#).
- MMG publishes relevant standards and policies on its corporate website [www.mmkg.com](http://www.mmkg.com)

## Commitment to the Voluntary Principles Continued

### 2. Efforts to promote awareness of the VPSHR

At a corporate level, we constantly highlight our role in implementing and advocating for the use of the VPSHR across our sites. We provide the required support and guidance to our site teams to do this within their own jurisdictions to ensure we drive change at the local level.

We work with private and public security forces at our Kinsevere (DRC) and Las Bambas (Peru) sites. This work involves ongoing training and mentoring on security and human rights. We also engage regularly with host governments as well as authorities at all levels about the VPI, including participating in workshops, training exercises, national dialogue spaces and advocacy.

### 3. Efforts to promote and advance implementation of the VPSHR

In 2024, MMG representatives worked with civil society organisations and partners to promote the VPSHR, including our security contractors, national security forces and other organisations.

As a member of ICMM, we work closely with other member companies and associations to highlight the important work of the VPI and ensure broad adoption of the VPSHR across the extractive industry.

At a site level, we work with local partners, including local government and communities, to raise awareness about the VPSHR, and continue to engage externally with peer companies, shareholders and other stakeholders about our membership to the VPI and our implementation experience. See section 10 for more information about site-specific initiatives.





# B

## Policies, Procedures and Related Activities





# Policies, Procedures and Related Activities

## Continued

### 4. Relevant policies and procedures

MMG's policies and standards on human rights and security are based on a strong commitment to respecting the internationally recognised human rights of individuals and groups who may be impacted by our activities.

Our commitments and approach to human rights are embedded across our Human Rights Policy, Code of Conduct, Supplier Code of Conduct and other related policies, standards and frameworks that, together, constitute our Human Rights Framework. We integrate human rights considerations into our employment and third-party onboarding processes, risk-analysis activities, supply management, SMPs, community engagement, social investment and formal grievance mechanisms.

All our documents are available in the official languages of the jurisdictions in which we operate – English, Chinese, French and Spanish.

MMG also has robust assurance processes to ensure all mandated requirements within our standards are being met. This 'three lines of defence' approach ensures specific actions are developed and executed to provide line management with first line assurance on the processes executed by the functional department at the site level. Processes are then implemented to provide line and functional management with second line assurance on actions executed by assets. Head Office discipline function teams are responsible for second line, providing assurance to the accountable executive committee member/s and relevant site General Managers. A Board-reviewed and mandated internal audit process provides third line defence.

In 2024, we released an updated Human Rights Policy including a strengthened commitment to conduct our security arrangements in accordance with the VPSHR and for our private security providers to align with the International Code of Conduct for Private Security Providers. We also published our first Responsible Mineral Production and Sourcing Policy, which is aligned with our Human Rights Policy and the Organisation for Economic Co-operation and Development's (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas. The policy commits to the responsible production and sourcing of minerals that respects human rights (including adopting policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired), ethical business practices, safeguards the environment and promotes economic development. Both policies can be found on our website at [mmg.com](https://mmg.com).

VPSHR requirements are included in the Safety, Security, Health, Environment (SSHE) Performance Standard, including a requirement for sites to develop, implement and maintain site-specific SMPs based on the identification and analysis of site-related security threats and respective critical controls. Sites are also required to develop, implement and maintain site-specific procedures for MMG-controlled firearms management that complies with the International Association of Oil & Gas Producers, specifically firearms and the use of force (Report 320). The SSHE team at Head Office performs second line assurance to support and review the implementation of the VPSHR and provide feedback to the general manager of the operation as well as the MMG Executive Committee.

Human rights and security requirements are incorporated into our Social Performance Standard, with our Head Office team providing guidance and support to sites to ensure they are implementing the required due diligence requirements and provide regular updates to the business.

As a member of the ICMM, MMG also adheres to ICMM Mining Principles in its operations and standards.

## Policies, Procedures and Related Activities Continued

### 5. Approach to risk assessments

MMG applies business-wide standards to define the minimum requirements for managing material risks, meeting legal requirements and external reporting obligations, and creating and preserving competitive advantage and organisational effectiveness. In our assessments we consider issues and risks arising from specific geographical, political, social, economic and governance contexts with security and human rights as a central component.

Our assurance program focuses on verifying that the critical controls required to manage material risk events are implemented and effective. Our material security-related human rights risks include those related to engaging private security contractors and using public security forces at Kinsevere and Las Bambas.

We identify material, credible security threats to worker safety and the seizure of assets by accessing local information and knowledge. Critical controls in our threat-based site SMPs aim to provide physical security and deter unauthorised access, as well as provide appropriate intervention if unauthorised access is detected.

MMG's principles for security management ensure that our site-specific SMPs are aligned with the VPSHR and include critical security controls and rules of engagement for MMG-controlled security personnel that are frequently verified by site management.

The Company's risk management and internal audit processes are subject to periodic, independent external assessment against relevant international standards and industry best practice. The annual internal audit plan is approved by the Audit and Risk Management Committee.

Its focus is on material risks to the business, both financial and non-financial, including security and human rights.

MMG regularly assesses sites' alignment of SMPs through the SSHE function, which focus on the effectiveness of the critical security controls.

MMG's review of performance involves a business-wide integrated audit with external verification to assess the effectiveness of MMG's critical risks and controls.

In 2024, to support sites with the implementation of the updated Human Rights Policy and the requirement to conduct ongoing human rights due diligence. MMG released a group wide Human Rights Due Diligence Work Quality Requirement (WQR). In 2025, the WQR will be implemented by sites with support from our Head Office human rights team.

In 2025, all our sites will be required to contribute to a group-wide salient human rights issue assessment, including assessing the adequacy of controls in place and developing actions plans and metrics.





## Policies, Procedures and Related Activities Continued



### Case study: Las Bambas' human rights impact assessment

MMG recognises that the social and geographical context in which Las Bambas operates is complex and identified the need to draw on external independent human right expertise to conduct a Human Rights Impact Assessment (HRIA). In 2024 Las Bambas appointed an internationally recognised human rights consultancy to conduct the HRIA in line with the UN Guiding Principles on Business and Human Rights and other relevant best practice for conducting HRIAs. The HRIA will identify and assess actual and potential human rights impacts across Las Bambas' operations and supply chains and assess Las Bambas' measures to address the human rights impacts (through prevention, mitigation and remediation). This comprehensive process will also include a human rights lens on our approach to security.

The HRIA consists of three stages: (i) information analysis (internal documents, procedures, and company policies), and interviews with key leaders across the company; (ii) fieldwork including rightsholder and stakeholder engagement; and (iii) processing of data and final reporting.

Las Bambas also appointed an independent human rights advisory group, comprised of five international human rights experts to provide oversight and technical support to the HRIA and assist Las Bambas in setting and implementing an action plan. The advisory group is being facilitated by an independent human rights consultant who liaises with Las Bambas and MMG on the group's feedback and progress.

In preparation for the HRIA the Las Bambas' internal human rights committee conducted a human rights awareness raising program across their business. The first stage of the HRIA commenced in October 2024 and the HRIA will continue to progress throughout 2025. MMG will continue to support this work and communicate on the outcomes.



## Policies, Procedures and Related Activities Continued

### 6. Company procedures to report security-related incidents

MMG captures and records significant incidents through our centrally managed electronic Incident and Event Management system (IEM), which oversees corrective actions for incidents, near-misses, high-risk hazards, legal non-compliances, inspections and audits. This includes any security-related incidents with human rights implications by public or private security forces. We respond to human rights related incidents in line with the UNGPs and will draw on human rights expertise in deciding how to respond.

Where a significant incident has taken place, our site teams are required to report this to the relevant authorities within the host country to ensure they have been informed. It also gives us the opportunity to ensure the corresponding actions are taken to manage and prevent a similar incident from occurring again. Regular dialogue with government representatives, members of the public security force and briefings would be required, as outlined in our site-specific SMPs.

We support efforts for strengthening the protections for human rights within the public institutions in our host countries through ongoing advocacy and regular engagement channels.



### 7. Company procedure to consider VPSHR in security relations

MMG's SSHE Performance Standard requires private security companies to be a signatory to, or commit in writing that they comply with, the International Code of Conduct (ICoC) for private security providers and the VPI. Public security agencies that support MMG's operations are advised of MMG's commitment to the VPI and its expectation of their adherence to the principles, confirming this, where possible, in a memorandum of understanding (MoU). VPSHR requirements have been included in a scope of works, and providers are requested to produce a certificate/proof of being a member of International Code of Conduct for private security services providers.

MMG periodically reviews and amends MOUs with security forces. These MoUs articulate MMG's expectation of private and public security provider's code of conduct, their use of firearms, and the use of force responses appropriate to any given threat.

MMG's approach to training continues to focus on building a solid foundation and awareness about the VPI across the company.

### MMG Security Training Snapshot (1 Jan 2024 to 31 Dec 2024)

Country	Training topics	# Participants who received training
<b>DRC</b> 	<ul style="list-style-type: none"> <li>• VPSHR</li> <li>• Rules of engagement</li> <li>• Criminal participation</li> <li>• MMG Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>• <b>135</b> police / public security officers</li> <li>• <b>910</b> private security employees (560 security employees from the previous contractor and 350 private security employees from the new security provider)</li> <li>• <b>35</b> MMG Security staff</li> </ul> <p><b>Total people trained: 1,080</b></p>
<b>Peru</b> 	<ul style="list-style-type: none"> <li>• VPSHR</li> <li>• Rules of engagement</li> <li>• Business and human rights</li> <li>• MMG Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>• <b>437</b> police / public security officers</li> <li>• <b>200</b> private security employees</li> <li>• <b>448</b> MMG employees</li> <li>• <b>5,306</b> contractors</li> </ul> <p><b>Total people trained: 6,391</b></p>



## Policies, Procedures and Related Activities Continued

In 2024, MMG trained 572 public security personnel across the business, with 437 located in Peru and 135 in the DRC. We also trained a total of 1,195 private security contractors throughout the year. These numbers do not include the extra police and private security personnel that were trained at Las Bambas prior to short-term security postings, which is mandatory before any security officer undertakes an operation near our site. Both operations provided mandatory refresher training for all private security personnel on site during the year.

### 8. Company procedure to investigate security-related incidents by security forces

MMG's grievance mechanisms are governed by MMG-wide procedures, which include managing alleged security and human rights abuses. Each site is required to follow these procedures while also considering individual cultural and legal contexts.

Proactive communication, community engagement, training and grievance resolution are pivotal elements within MMG's human rights framework. MMG's Stakeholder Grievance Management Work Quality Requirement (WQR) helps to identify impacts, address them at an early stage and provide remedy where applicable.

Each of our operations has a site-specific grievance mechanism in place, aligned with the common MMG Stakeholder Grievance Management WQR, aimed at facilitating a timely, culturally appropriate investigation and response to grievances raised by community members. Reporting can occur through many different mechanisms, including formal company processes in face-to-face conversations with MMG People,

an independent whistle blower service, through social media or other electronic means, and MMG's Stakeholder Feedback Portals.

MMG's site-specific external facing Stakeholder Feedback Portals provide a transparent way to record, report and monitor the handling of any security-related incidents with human rights implications by public/private security forces operating on any MMG sites. This has been integrated into our broader site-specific grievance mechanisms and ensures all complaints received from stakeholders are addressed through a structured process, aligned with the UNGPs effectiveness criteria for non-judicial grievance mechanisms. These can be raised anonymously and have been designed to protect stakeholders from fear of reprisal or repercussions.

MMG's Whistleblower Framework outlines the process for reporting any improper conduct (including human rights breaches or other breaches of the [MMG Code of Conduct](#)), the protections afforded to people who report improper conduct, how such reports will be dealt with and the type of action that may be taken as a result. The framework applies to all current and former officers, employees, associates, suppliers and others. Concerns can be raised internally within MMG or externally via the independent and confidential Whistleblower Service. MMG also has dedicated contact officers with whom employees can contact to raise a concern. External parties, such as suppliers, are given access to MMG's confidential Whistleblower Service, via the Code of Conduct and Supplier Code of Conduct, to raise any concerns they may have in relation to improper conduct. The Whistleblower Framework is available [here](#).





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# C

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## Country Implementation





# Country Implementation Continued

## 9. Overview of country operations selected for reporting

MMG has undertaken a risk assessment of security and human rights issues across our jurisdictions, and for the purposes of this report we will be focusing on the countries considered to be high risk—the DRC and Peru.

### DRC



- The DRC is still recovering from a series of conflicts in the 1990s. It remains a fragile country with tremendous economic and social development needs, including governance.
- The security situation in eastern DRC remains unstable. Armed groups are present and intercommunal violence can affect the political, security and humanitarian situation. There are continued reports of several towns in eastern DRC being attacked by, or falling under temporary control of, armed groups. There are reports of attacks and kidnappings, including against staff from NGOs and international organisations.
- At our site, we continue to face site incursions. These can sometimes be violent, with armed intruders threatening our employees or attempting to destroy our property. Our security teams are trained to manage these situations effectively without the use of force. At times, children have been involved in these incursions. Our teams manage separate processes for when a child has been identified in a security incident, working with local authorities to ensure we are protecting the child's rights and not exposing them to further risk once removed from the site.
- At Kinsevere, our social development and security teams work closely together to identify potential security issues ahead of time. We work hard to foster trusting, respectful engagement with our host communities, ensuring we hear their concerns and include them in participatory planning to ensure we can support the delivery of tailored development opportunities for them.

### Peru



- Peru was relatively stable during 2024 compared to 2023, with the threat of political unrest reducing. However, the security situation near mining operations has become increasingly complicated because of increased illegal and artisanal mining activity throughout the country.
- During 2024, Las Bambas faced a series of intrusion attempts, which were successfully deterred by private and public security. During these incidents, security agents used only riot protection equipment and plexiglass shields. No weapons of any kind were employed during activities.
- Despite our best efforts to protect our people, multiple injuries were registered in private and public security agents in security incidents during the year. The most serious cases were recorded in June and July with a balance of 65 agents injured: 25 private security (6 seriously, and an additional 3 hospitalised) and 40 public security officers. In November, another serious incident was recorded, resulting in 43 private security agents injured (6 seriously, 2 in critical condition).
- The increase in violence used by external groups has caused significant concerns on site, with new technologies being employed to protect our people and strengthen our boundary lines.
- The Las Bambas team continues to dedicate significant time and resources to create meaningful engagement spaces and deliver on commitments to our host communities. A dedicated team of more than 100 MMG people support direct, ongoing engagement with our host communities.
- We do acknowledge that, for a period of the year, a State of Emergency had been declared along our Logistics Corridor. This prevented the road from being blocked by communities due to the risk of violence, but it did not prevent community members being able to assemble freely or protest. We continued to work with our stakeholders to address any issues as they arose and have been working hard on developing new engagement strategies and systems and processes for our teams to better support our communities.

# Country Implementation Continued

## 10. Engagement with stakeholders on country implementation

This year the focus continued to be on training the PNP officers in Peru and training the mine police officers in the DRC. We also increased our engagement with stakeholders including government, civil society and other organisations about our human rights and security considerations at a site level.

### DRC



In the DRC, our team continued to promote the VPSHR through their active participation in the Haut Katanga province VPI working group, including attendance in all monthly human rights meetings. Participants of this working group share, discuss, and suggest best VPSHR practices together with appropriate recommendations regarding security and human rights incidents recorded in the extractive sector. They also participated in official human rights meetings organised by the DRC's human rights ministry and the Geneva Centre for Security Sector Governance (DCAF), with the goal of implementing the VPSHR action plan at a national level.



### Peru



The Las Bambas Committee on Human Rights has a formal procedure and nominated members from 10 internal functions, with oversight and governance by both the General Manager of Sustainability and Corporate Affairs and General Manager of Operations.

In Peru, we actively participated in the development of national guidelines for the implementation of a human rights due diligence process for the extractive industries, led by the Sociedad Nacional de Minería, Petróleo y Energía (SNMPE). These guidelines are aligned to VPSHR and ICMM mining principles.

Our Las Bambas operation is part of the VPSHR Extended Working Group in Peru. In 2024, this Working Group organised meetings covering various topics related to security and human rights in the extractive industry, including the threats in terms of security posed by informal and illegal mining as well as a briefing from the Deputy Head of the VPI Secretariat on the VPI Strategic Plan in Latin America for the 2023–2026 period.

Las Bambas is a member of the Human Rights Committee of SNMPE. SNMPE is also a full member of the VPI. In 2024, the Committee met and discussed human rights, illegal and artisanal mining and security implications, a review of the “Consolidated Mining Standard” and its new human rights requirements and other topics.

In May, members from our Las Bambas team participated in a workshop run by ICMM on Human Rights Due Diligence. Additionally, Las Bambas presented a case study that is part of the ICMM's new Human Rights Due Diligence Guidance Tools, published on the ICMM website.



## Country Implementation Continued



MMG employees and community representatives at our Kinsevere operation.

### **Case study:** **Managing community** **conflict through dialogue**

At MMG we are committed to preventing and resolving conflict with our host communities through dialogue. In November 2024, a protest near our Kinsevere operation blocked the road used by our employees to gain access to the site. The community made multiple demands, including the electrification of their villages, greater transparency in the management of royalties paid by MMG to the Bukanda Sector Decentralized Territorial Entity, and a solution to a water quality issue they linked to mining activities.

While MMG security and police intervened to clear the road in accordance with the VPSHR and in close coordination with the local government, Kinsevere sought to find a longer-term solution through dialogue to prevent further incidents.

The Kinsevere team convened a meeting with local authorities from the Haut-Katanga province, the Bukanda Sector and the Kasongo Groupment, as well as representatives from the involved community and discussed all the issues raised. The roles of each group were clarified, and the community was invited to further engage in participatory planning of social development initiatives with the company and communicate directly with their local government about the use of royalty payments.

## Country Implementation Continued

### 11. VPI considerations in the selection of private security providers

MMG's supplier engagement and contract award processes include a comprehensive assessment across a range of criteria including commercial, social, safety, environment, quality and technical capabilities. As part of the supplier selection processes, we also assess a range of non-financial criteria around supporting sustainable development in the regions where we work, including local community training and commitment to local employment. As part of our supplier engagement process, we seek formal agreement from suppliers to comply with our Code of Conduct, Supplier Code of conduct and Anti-Corruption Standard, as well as with all relevant Company standards, policies and procedures. This includes the Supply, Fatal Risk, Social Performance and SSHE Performance Standards.

Selection of private security providers is done by MMG sourcing and contracting teams at each site. The process is conducted through a tender process. The criteria and requirements are communicated in the scope of work and MMG expectations are clearly articulated. The documentation, due diligence and assessment of information is done in partnership with the sourcing and contracting teams and the security teams. Security teams specifically focus on assessment of security, safety and human rights practices. Part of this assessment is to assure all private security providers are signatories to, or agree in writing to comply with, the International Code of Conduct for Private Security Providers (ICoC) and the VPSHR. Once the bidders are shortlisted, then security teams undertake site visits to assess each short-listed bidder. Those bidders who are successful are awarded a contract.

### 12. Examples of supporting VPSHR outreach, education and/or training

#### DRC



In the process of validating the DRC Government's application to be a full member of the VPI, representatives from our Kinsevere operation participated in all workshops organised by the central Government with the support of DCAF.

During the workshops in Lubumbashi, a national VPSHR action plan was developed with the working group gathering participants from the other provinces of the country.

The draft of recommendations and actions was validated and amended at a major workshop in Kinshasa, the capital city of DRC, before being presented to the DRC Minister for Human Rights, who will present them to the Council of Ministers chaired by the Head of State.

#### Peru



During 2024, Las Bambas received a formal visit from representatives of the UNHCR to discuss MMG's governance framework, the operational and social context of Las Bambas, our impact on and support for our host communities and Las Bambas' human rights management plan, including progress on the first phase of the site's human rights impact assessment.

We also hosted the Sié Chéou-Kang Center for International Security and Diplomacy at the Josef Korbel School of International Studies at our operation as part of research the Center was undertaking on how different mines, governments and communities are experiencing and managing the impact of the mining necessary to provide for the clean energy boom. They spoke with local community members and other local stakeholders near our site and we updated them on our main milestones and social challenges (the dynamics of social conflicts, role of government in the area, economic contribution and the growth and transformation of living conditions in the local regions). It also gave us an opportunity to highlight our VPI membership and alignment with the VPSHR.



## Country Implementation Continued

### 13. Company procedure to review progress on implementing VPSHR at local facilities

Human rights working groups at each site continued to regularly meet and progress their work in 2024.

The working groups support and guide the site as it implements the VPSHR. These working groups consist of representatives from Security, Social Performance, Legal, Human Resources, Operations, Supply Chain, Corporate Affairs and SSHE functions, who come together to review and address site-specific issues and advance the VPI Action Plan.

Site-specific policies, procedures and processes are reviewed in conjunction with the gap analysis and risk assessments to develop further actions for improvement.

The working groups meet with MMG head office representatives at least once a quarter to update on progress and gain any additional support as required. The progress of these groups is then shared with the Code of Conduct and People Committee, as well as with our ExCo as required.

#### DRC



At our Kinsevere operation, the Human Rights working group continued to work against its action plan throughout 2024. This included updating training and support for security personnel, raising awareness within the site of the importance of complying with the VPSHR and broader human rights considerations. The site continues to engage a strategy of employing community members as security contractors. We require our private security contractors to recruit from local communities, providing the required training and development and ensuring that these practices are done with the full support and engagement of the village chiefs and regional authorities. This initiative aims at supporting the local economy and providing employment opportunities to the youth in the region, and raises awareness within host communities of the VPSHR.

In 2025, the Human Rights working group will focus on:

- Focused awareness sessions with functions teams within the operation
- Updated training about child protection by external human rights experts
- Modern slavery considerations across the operation and the supply chain
- Review of site-level governance documentation and update as required

#### Peru



In 2024, the Las Bambas Human Rights Committee drove action against their Operational Plan through the lens of culture, and compliance and governance. Key activities included:

- Implement the 2024 Human Rights Training Plan (for both direct and indirect staff)
- Develop and implement the 2024 Communications Plan for the Committee
- Ensure compliance with MMG's Supplier Code of Conduct: Modern Slavery

For 2025, one of Las Bambas' key objectives is to have a more integrated and diverse Committee. In this regard, the Operational Plan will be guided by five focus areas that address key human rights issues. Each area will have a responsible leader who will work closely with multidisciplinary teams.

The focus areas for 2025 are:

- Modern slavery in supply chain
- Security and protection of individuals
- Human rights culture
- Discrimination and decent work
- Human rights allegations

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# D

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## Lessons and Issues





# Lessons and Issues Continued

## 14. Lessons and issues

In 2024, we rolled out our updated Human Rights Policy and Framework. We found our sites grateful for the updated guidance and support, and the importance of regular training from the Head Office was reinforced when a number of team members undertook the ICMM's Human Rights Due Diligence training in Lima, Peru and Johannesburg, South Africa during the year. We also found opportunities to further strengthen our commitment to human rights and transparency and took the opportunity to develop and release MMG's Responsible Mineral Production and Sourcing Policy. In 2025, we will continue to roll out these corporate policies across the business with the accompanying training, so all employees are aware of their obligations as set out by these documents.

Issues relating to ongoing social unrest and artisanal mining activity around Kinsevere continue to cause problems for the operation, with incidents recorded of community members and miners (and in some cases, children) encroaching the Kinsevere tenement. We have also recorded an increase in the use of violence by intruders during these events, causing injuries to our security forces. All situations were managed in accordance with the VPSHR. The site social development and security teams are working closely together to continue strengthening community engagement ties and look for alternative forms of employment and opportunities, to reduce the risk of encroachment moving forward. In 2025, the team will be dedicating significant resources to raising awareness, both across the site and with local and regional government authorities about the risk of children on mine sites and increased protections for them.

Our Las Bambas team faced challenges relating to increased violent incidents near the site, causing injury to our people and property damage. As a result of these incidents, a renewed focus has been placed on the importance of prevention, adequate risk assessments and regular, comprehensive training to support our people. The Committee on Human Rights has developed a strong action plan for 2025 to address this increasingly complex situation, as well as the potential political instability during 2025 in the lead up to national elections in 2026. In addition to the key actions mentioned in Section 13, the team will be focusing on the following awareness and training initiatives:



### Guidelines and documentation

Development of site-specific guidelines, based on corporate guidance and international best practice for human rights protections.



### Leadership and team training

Organise training programs for senior management, operational supervisors and other key stakeholders on the importance and application of the VPSHR. The training should then be passed on to their teams.



### Employee Awareness

Conduct awareness campaigns to explain the importance and benefits of adopting responsible, social and environmental principles.



### Awards and Recognition

Create recognition and award programs for strategic partners who successfully implement these principles, encouraging further social and environmental commitment.





