

GEMFIELDS



Voluntary Principles on Security and Human Rights

CORPORATE PILLAR MEMBER ANNUAL REPORT 2025

INTRODUCTION

Gemfields is pleased to set out in this Annual Report its efforts to implement the Voluntary Principles on Security and Human Rights during 2025, thereby updating the Voluntary Principles Initiative (“**VPI**”) and its Corporate Pillar Members of key events, initiatives and actions taken by Gemfields in this important area.

This is Gemfields’ third report to the VPI since being admitted as a full member of the Corporate Pillar of the VPI in May 2023, and Gemfields is pleased to have joined this community of companies, civil society organisations and governments seeking to advance the Voluntary Principles on Security and Human Rights (“**VPSHR**”) in often challenging circumstances.

Gemfields’ two key operations are its ruby mine in Montepuez, Mozambique (known as Montepuez Ruby Mining Limitada or “**MRM**”), and its emerald mine in the Zambian Copper Belt (known as Kagem Mining Limited, or “**Kagem**”). For a more in-depth look at Gemfields’ corporate structure and other exploratory licences, please see Gemfields’ VPI Engaged Company Report 2021 and the Gemfields Group Limited website.

COMMITMENT TO THE VOLUNTARY PRINCIPLES

Gemfields’ statement of commitment

Senior management at Gemfields – comprising Sean Gilbertson (CEO), David Lovett (CFO), the Mozambique and Zambia Country Managing Directors, Toby Hewitt (Group Legal and Corporate Affairs Director, and Company Secretary), Edward Johnson (Corporate Responsibility Director), Magnus Van Der Merwe (Group Director, Protection Services), among many others – are aware of and committed to the VPSHRs, their implementation and Gemfields’ ongoing work with the VPI. There is a top-down approach in this regard, and we seek to have this commitment replicated throughout the operations.

We reiterate our core three principles in relation to the implementation of security and human rights:

1. To respect human rights by promoting compliance and transparency.
2. To take a human rights-focussed approach to risk at the operations and in the communities where Gemfields operates; and provide access to remedy where required.
3. To provide appropriate and proportional security at the operations without adversely impacting the human rights of our personnel or of the communities surrounding our operations.

Gemfields is committed to complying with the overarching principles of the Universal Declaration on Human Rights (“**UDHR**”), the VPSHR and United Nations Guiding Principles on Business and Human Rights (“**UNGPs**”). Gemfields's commitment extends to raising awareness of human rights, and to sharing its knowledge and experiences with interested parties and stakeholders, as well as disseminating this commitment throughout its operations.

A public statement of this commitment, including reference to the VPSHR can be found on Gemfields' website at: <https://gemfields.com/sustainability/our-approach/>.

Gemfields further communicates its commitment to the VPI and the VPSHRs in both its public communications in open forums such as workshops, as well as in private communications with various stakeholders. Stakeholder initiatives and industry standards which Gemfields participates in such as VPI are included in materials used when engaging with new and existing stakeholders.

Engagement in the VPI

Among others, Gemfields has participated in the following VPI events:

- Edward Johnson, Gemfields' Corporate Responsibility Director, and Toby Hewitt, Group Legal and Corporate Affairs Director attended the VPI Plenary in London from 18 – 21 March 2025. Toby Hewitt participated in a Learning Session on Taking Action to Ensure Meaningful Remedy through Operational Grievance Mechanisms;
- On 22 May 2025 representatives from MRM attended the 13th Meeting of the Voluntary Principles Initiative National Working Group in Maputo;
- On 23 May 2025 representatives from Gemfields attended the UK Foreign, Commonwealth and Development Office's UK Working Group meeting on the Voluntary Principles;
- On 11 August 2025, representatives from MRM attended the 14th Meeting of the Voluntary Principles Initiative National Working Group in Maputo;
- In December 2025 Toby Hewitt, Group Legal and Corporate Affairs Director and Antonio Madure, Senior Legal Advisor MRM, attended the High-level VPs Joint Visit to Mozambique - Maputo leg. Toby Hewitt spoke at a session on Promoting the Voluntary Principles in Mozambique: Challenges and Opportunities and Antonio Madure spoke at an event on the private security sector in Mozambique.

Promotion of the VPSHRs

Gemfields is keen to take the opportunity to promote the VPSHRs and raise awareness of the same both internally and externally. Gemfields works with various NGOs and civil society organisations to promote the VPSHRs, such as the Centro Para Democracia e Desenvolvimento (“**CDD**”), which is an organisation headquartered in Maputo, Mozambique, working to promote human rights advocacy including defending justice, equality, and dignity for everyone.

Gemfields has attended a number of VPI meetings throughout 2025 in which Gemfields has expressed its support for Mozambique's application to become a Full VPI Government Member, whilst noting the many complex and ongoing issues facing the country and which impact upon the Mozambican mining sector.

In 2025 Gemfields entered a Memoranda of Understanding with the Montepuez Police Station for the assignment of a police representative to MRM, with a specific focus on community engagement on the VPSHR and human rights more generally. A Memoranda of Understanding was also entered with the Montepuez Military Training Base for the assignment of a Mozambican Military (“**FADM**”) representative to fulfil the same role.

To support the promotion of the VPSHR, MRM launched Project Unidade. Under Project Unidade, twenty-seven “VPSHR Community Representatives” have been appointed from the nine villages surrounding MRM (three per village). Typically, the VPSHR Community Representatives are comprised of one male and one female, along with the village leader. Human Rights training sessions are conducted by MRM with the VPSHR Community Representatives twice a year. Therefore, two such training sessions were held in 2025. The training sessions are designed to help educate community members on human rights. Along with signposting reporting channels if community members feel that their human rights are being infringed.

Project Unidade also aims to provide alternative livelihood options for community members. To date, forty-nine community members have been employed as security guards at MRM through Project Unidade.

POLICIES, PROCEDURES AND RELATED ACTIVITIES

Policies and procedures

At a corporate level, the VPSHRs are enshrined into the Gemfields Group Policy Manual and Standard Operating Procedures (the “**GPM**”), which is the Group-wide document setting out the policies and procedures applicable to the whole business. Within the GPM, the Gemfields Group Human Rights Policy (“**Human Rights Policy**”), which has recently been reviewed and updated, sets out Gemfields’ commitment to align to the internationally recognised human rights set out in the UDHR, UNGPs and the VPSHR. The Human Rights Policy sets out three focus areas most relevant to Gemfields’ operations and supply chain. This includes human rights and security.

Underscoring Gemfields’ commitment to promoting compliance with the VPSHR throughout the organisation, key policy obligations in the Human Rights Policy include to:

1. Conduct security and human rights risk assessments and update them as required;
2. Require that security is appropriate and proportional to the threat. This includes mandating that force is only used in accordance with the law and Gemfields’ documented standard operating procedures;
3. Promote respect and understanding for human rights by providing training to employees and public security force personnel on the VPSHR;
4. Require in all agreements with private security providers that they train their personnel on the VPSHR;
5. Ensure that VPSHR model clauses are included in all agreements with public security forces;
6. Ensure that public security forces are aware of Gemfields’ expectations that they operate with respect for human rights and adhere to the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and the United Nations Code of Conduct for Law Enforcement Officials;
7. Work with public security forces to try to ensure that all apprehensions and detentions carried out on the Gemfields’ mining concession areas are in compliance with local laws and the VPSHR.

The GPM includes the Gemfields Group Human Rights Incident Reporting & Investigations Policy (“**Human Rights Incident Reporting & Investigations Policy**”), which clearly sets out

that all protection service officers and contractors are responsible for the mandatory reporting of allegations of human rights violations immediately through their chain of command, and that failure to report a violation or suspected violation will result in disciplinary action.

The Human Rights Incident Reporting & Investigations Policy sets out the reporting chain of command and timeline. Reports are to be made immediately from patrol or security personnel, and can be made verbally, or via Gemfields' QUORI reporting system, SMS, mobile, or radio. The immediate report must be submitted as soon as it is safe to do so, or at the latest by the end of a patrol/shift. Within no more than 12 hours, the immediate report must be made into a formal initial written report (email or standard project incident report format) and sent to the Project Head Protection Services, who will submit an initial report on Gemfields' internal "G-Trac" system. The Project Head Protection Services will request an investigation into any alleged incident involving, among other things, the use of force, the discharge of a weapon, or any violations of human rights. An investigation then needs to be conducted in accordance with procedure.

Other key operational policies and procedures which support the Human Rights Policy and the Human Rights Incident Reporting & Investigations Policy include:

- Gemfields Group Artisanal Mining Policy;
- Gemfields Group Protection Services Policy;
- MRM Guard Posting Procedure;
- Gemfields Group Patrols, Apprehension & Detention Policy;
- Gemfields Group Use of Force Policy & Graduated Force Response;
- Kagem Safe Handling and Storage of Company Firearms;
- Kagem Use of Firearms and Live Ammunition Procedure;
- Gemfields Group Use of Canines (K9) Policy;
- Gemfields Group Body-Worn Security Recording Devices (Bodycams) Policy.

MRM has designed 'Use Of Force cards' which are provided to both private and public security providers at MRM as an 'aide memoire' to support the regularly provided VPSHR training.

Security structure

Gemfields operates the following levels of security at its main operations:

- Internal security, who are employed under a contract of employment (referred to as "Protection Services"). Internal security are not armed i.e. they do not carry firearms (or any type of arms).
- Private security contractors, who are contracted to assist Protection Services with security operations (currently GardaWorld).
- Public security forces, provided by the relevant Government.

Police lead Protection Services and GardaWorld on joint patrols inside of the concessions. Police, being representatives of the state, act on the state's behalf and do not take instructions from MRM, Kagem (or the relevant Group entity, as appropriate) or GardaWorld. The police are responsible for making any arrests.

Generally, at Gemfields' exploration sites, limited numbers of private security contractors are used in a static guarding capacity only. Protection Services may provide ad-hoc additional support to exploration sites but, largely, exploration sites do not have dedicated contracted Protection Services personnel. Management oversight from the main operations is provided to exploration sites via private security contracting arrangements.

Risk management and assessment

Gemfields continues to use the Gemfields Enterprise Risk Management System (“**GERMS**”), based on the ISO31000 international risk management standard. This involves the use of a register in which various risks are categorised and overseen by a specific individual, such as HOD Protection Services, Group Director Protection Services, Head of Risk and Assurance, and others. The GERMS is stored on Gemfields' internal “G-Trac” system, and key risks are reported to the Gemfields Group Board level, Audit and Risk Committee which monitors the Group's overall risks. The Audit and Risk Committee reports into the full Gemfields Group Board.

In addition, regular operational risk assessments are carried out including in relation to the following security and health and safety risks:

1. Insurgency and Related Movement & Incidents;
2. Pit wall collapse;
3. Entering and working in confined spaces;
4. Moving load-carrying equipment overhead traveling crane, industrial vehicles, overhead conveyor);
5. Insects, snakes or scorpions and other wildlife threats;
6. Inadequate lighting;
7. Physical Aggression by illegal miners;
8. Fall/Slip/Trip (same level);
9. Hit-and-run - vehicles or equipment;
10. Patrolling;
11. Pit closing;
12. Static Guard Posts;
13. Falling vehicle/equipment into water;
14. Fire.

Anuera, a third-party risk management organisation who provides training, investigatory and advisory services to the Group, assists Gemfields in its assessment of risks as part of Anuera's overall engagement with Gemfields' operations. Anuera plays a key role in Gemfields' implementation of the VPSHRs, conducting, where required, independent investigations into sensitive VPSHR matters arising, engaging with Protection Services teams on security issues and advising both the operations and at the Group level as needed.

Over the past year, Gemfields has worked on creating a Human Rights, Security & Conflict Management System. As part of this process, a refreshed risk assessment exercise, for Gemfields' operations in Mozambique was conducted, focusing on conflict and security. The risks and implementation of mitigations will be monitored on an ongoing basis through the GERMS. The refreshed risk assessment exercise also fed into the recently updated Human Rights Policy.

The focus on human rights due diligence (“**HRDD**”) is part of a continual journey to ensure that Gemfields’ processes and procedures are commensurate to the evolving risks it faces as a business and in light of evolving operational circumstances, the changing regulatory landscape and changing expectations in the sector. While HRDD has already been an expectation of the UNGPs and is an important part of implementing the VPSHRs, Gemfields is aware that in recent years, there has been a rise in legislation requiring HRDD, particularly in Europe, which adopt the approach to HRDD set out in the UNGPs. This includes the Corporate Sustainability Due Diligence Directive (“**CSDDD**”) which applies to certain companies incorporated in or operating in the EU. Gemfields is not caught directly within the scope of such legislation, but many of Gemfields’ downstream customers will be. Companies that fall within the scope of CSDDD are required to identify actual and potential adverse human rights impacts not only in their own operations but also in upstream and downstream business partners.

Additionally, HRDD is a key part of MRM’s efforts towards aligning with the responsible mining standard promoted by the Initiative for Responsible Mining Assurance (“**IRMA**”). The standard is divided in 24 thematic ‘chapters’, including a dedicated chapter for HRDD work, and intersecting HRDD related requirements across a host of parallel chapters – including security, conflict-affected and high-risk areas (“**CAHRA**”), grievance mechanisms, community engagement and beyond. At its core, across these criteria and chapters, IRMA seeks to support the establishment of a robust HRDD risk management system including, amongst others, proactive human rights risk assessments and annual risk-management plans. Gemfields and MRM have started an independent audit by IRMA-accredited auditors to enable verification against IRMA’s Responsible Mining Standard within 2026.

Engagement with Security Forces

Reporting security incidents with human rights implications

Gemfields’ clear and consistent policy, as set out in the GPM mentioned above, is that:

“all security personnel (in-house, private or public) are required to report human rights violations in accordance with the Group’s Grievance, Incident & Near Miss reporting Policy. This includes both human rights violations that have been witnessed first-hand, and credible and evidenced allegations of human rights violations.”

All “Grievances, Incidents, Near-Misses and Accidents” (“**GINAs**”) are uploaded to Gemfields’ internal system “G-Trac” to be reviewed and addressed by the relevant individual.

In terms of public security, in both Zambia and Mozambique, Gemfields has open lines of communication with the relevant commissioners, police forces, and military officials such that should any issues arise, reports can be made accordingly. In Mozambique, these are highlighted to the Provincial Police Commander in Pemba. In Zambia, these are highlighted to the Kanfinsa Commander, or, if needed, the Police Commissioner in Ndola. Once referred, they will take the necessary disciplinary actions as Gemfields does not have jurisdiction over public security forces. As police forces and the respective Police Commanders are on site and open lines of communication are established in regular meetings where commanders are present, cases are discussed in person and followed up. For example, there is a daily morning meeting at both Kagem

and MRM attended by internal security, the commanders of the public security forces and the managers of private security contractors, to discuss any incidents from the prior 24 hours and any possible or expected risks in the coming 24 hours, including specifically in relation to VPSHR risks.

Additionally, when MRM requested military assistance and resource from the Mozambique Defence Armed Forces (“**FADM**”) in Mozambique to assist in protecting against the insurgency, MRM provided VPSHR training to FADM personnel immediately upon their arrival on site. Similarly, when special police operations are required at MRM, additional VPSHR training is then provided to the police forces prior to the operation. Kagem has not yet had instances where this has been necessary, but would follow the same protocol should that arise.

Procedure for incorporating VPSHRs into relationship with security providers

GardaWorld have been providing private security services to MRM since 2020 and Kagem since 2022 (as well as other Gemfields Group concession areas), and there have been no material changes to the procedure for engaging private security services during that time. Gemfields requires GardaWorld’s compliance with, amongst many others, the VPSHRs, the UDHR, and to provide regular training to its personnel on the same. GardaWorld is a certified member of the International Code of Conduct for Private Security Providers (“**ICoCA**”).

Gemfields also seeks to take appropriate steps in its relationship with private security providers in response to the evolving threats and risks it faces. For example, as a result of the worrying escalation of the insurgency throughout 2024, MRM needed to request that GardaWorld station an additional twelve-armed guards on site. These armed guards remained on site throughout 2025. The guards were specifically selected and, in addition to the usual criminal background checks, were subjected to polygraph examinations where the focus of questioning was on the involvement in human right abuses.

However, issues in relation to the conduct of private security contractor officers must be reported to the contractor for appropriate disciplinary action, as was the case in certain instances in 2024 resulting in illegal miner injury at MRM. MRM emphasised to the contractor the importance of their VPSHR obligations, requesting confirmation that the relevant officers were removed from MRM’s concession, and that disciplinary action was taken, along with requesting further training and enhanced record-keeping and reporting procedures.

There are Memoranda of Understanding between MRM and the Mozambican Police, and Kagem and the Zambian Police, respectively, which contain the VPSHR model clauses.

Routine training on VPSHR, the UNGPs and anti-sexual and gender-based violence (“**SGBV**”) and human rights more generally is provided to employees at our operations, as well as to public security forces. Gemfields does not train GardaWorld employees, but requires GardaWorld to provide proof of training.

The below tables outline our training statistics at MRM and Kagem:

Montepuez Ruby Mining

HR/VPSHR	MRM													
	2025													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	
General staff	34	39	61	48	39	87	154	73	105	61	54	6	761	
Protection Services	1	1	1	1	2	3	0	2	1	5	2	0	19	
Public security	0	0	66	144	30	82	101	87	130	0	100	0	740	
Total training contact points	35	40	128	193	71	172	255	162	236	66	156	6	1520	

SGBV	MRM													
	2025													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	
General staff	34	39	61	48	39	87	154	73	105	61	54	6	761	
Protection Services	0	1	1	1	2	20	0	2	1	5	2	0	35	
Public security	0	0	66	144	0	80	101	87	130	0	113	0	721	
Total training contact points	34	40	128	193	41	187	255	162	236	66	169	6	1517	

An anti-bribery and-corruption (ABC) training module is included in the VPSHR training, provided by Anuera. In July 2025, 28 members of the police were provided with additional ABC training at MRM.

Kagem Mining Limited

HR/VPSHR	Zambia													
	2025													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	
General staff	0	0	0	0	0	0	0	0	0	0	0	0	0	
Protection Services	0	0	0	0	0	0	0	0	0	0	0	0	0	

Public security	0	0	6	4	3	2	42	17	14	2	12	24	126
Total training contact points	0	0	6	4	3	2	42	17	14	2	12	24	126

In 2025 only VPSHR training for the Zambian Police was conducted. Going forward in-house trainers have been identified from the Protection Services and Human Resources Departments, who will deliver bi-annual training to general staff and the Protection Services.

Training includes clear messaging on the VPSHRs and the UNGPs. Additionally, employees and others working at the operations are also aware of the purpose of the Operational Grievance Mechanisms, namely, to provide remedy to communities for any negative human rights impacts caused by Gemfields’ operations. One of the perhaps unintended consequences of Gemfields’ strong messaging on this is that security forces have in some instances reported that they are hesitant to use force in response to often very significant violence shown to them by, for example, illegal miners. This is because of the extensive training on the need to respect the human rights of the illegal miners and for fear of being found to be in breach of human rights policies. Gemfields has provided training on the appropriate use of force, per the Gemfields Group Use of Force & Graduated Force Response Policy, but additional training was provided by Human Level in 2023 (the human rights consultancy, led by the pre-eminent Anna Triponel) in light of this concern.

Investigation and remediation of security / human rights incidents by public and private security

The above notwithstanding, there have also regrettably been incidents where the conduct of security personnel has on occasion fallen short of that expected of them under their human rights obligations (including under the VPSHRs), in response to the alarming increase in violent and large-scale illegal miner intrusions on to the MRM concession. Typically, in response to such an incident, Gemfields would instruct Anuera to conduct an independent investigation into any alleged misconduct, require the immediate removal of any offending personnel, and formally reiterate our standards and zero-tolerance approach whilst reviewing contractual arrangements. Gemfields would follow up on any lessons learned and implement any necessary enhanced training to prevent such incidents occurring again.

Operational Grievance Mechanisms

Both MRM and Kagem operate Operational Grievance Mechanisms (“**OGM**”) in order to investigate and remedy any alleged negative human rights impacts on local communities caused by the operations’ activities.

MRM OGM

As outlined in previous Annual Reports a re-modelled MRM OGM (“**OGM 2.0**”) was launched in 2023, which replaced OGM 1.0 launch in February 2021. More information on the development of OGM 2.0 and the transition from OGM 1.0 to OGM 2.0 can be found in Gemfields VPI Annual Reports 2023 and 2024.

In 2025 OGM 2.0 received 388 claims of which 251 were within scope. Where, following investigation, it is considered that the alleged incident and negative human rights impact(s) are likely to have happened, the case is referred to mediation with the intention of exploring options of remedy. Following mediation, 19 cases have been awarded remedy. Non-financial compensation is prioritised through the provision of remedies in kind.

The MRM OGM is monitored, against the UNGP Effectiveness Criteria for grievance mechanisms, on a periodic basis by an Independent Monitor, Synergy Global Consulting. Monitoring reports are available on the Gemfields' website <https://www.gemfieldsgroup.com/assets/montepuez-ruby-mining-limitada/>.

Kagem OGM

The Kagem OGM was formally launched in March 2023 with a public awareness campaign, for communities nearby the Kagem Emerald Mine, intending to be run in accordance with the UNGPs. Its structure results from significant stakeholder engagement, including with local community members, learnings from other OGMs and input from human rights experts, in particular Human Level.

The Kagem OGM takes a mediation-based approach with all claims sought to be resolved through dialogue and mediation.

As at the end of 2025, the OGM had received 1,047 grievance claims since launch – that is, claims that relate to alleged negative human rights impacts connected to Gemfields and its operations. Of these, 167 had been closed (including via the OGM's Independent Ombudsbody process), of which 4 were provided with remedy accordingly. 880 active cases are still progressing through the OGM process.

The OGM's Independent Monitor, Jonathan Drimmer, completed his second independent monitoring visit to Kagem in July 2025, and his public report on the OGM's progress is available on Gemfields' website: (<https://www.gemfieldsgroup.com/assets/kagem-mining-limited-emerald-mines/>).

COUNTRY IMPLEMENTATION – MOZAMBIQUE AND ZAMBIA

Many of the topics covered in the Country Implementation section of the Reporting Guidelines have already been covered above where appropriate, but Gemfields wanted to take this opportunity to outline some of the country-specific challenges it has faced in Mozambique in particular. Such issues as outlined below have led to the formation of a Working Group comprising Gemfields and MRM representatives and representatives from the Mozambican Government. First, the insurgency in Cabo Delgado has proved extremely challenging and a source of significant concern for all those at MRM, and Gemfields more widely, as the protection and safety of personnel and assets are paramount. MRM deeply appreciates the presence of the FADM at MRM to assist in protecting against the risk posed by the insurgency, and is keen to ensure that protection is at all times sufficient. Gemfields notes that there is currently no Memoranda of Understanding

in place with FADM. Gemfields and MRM are actively engaging the Ministry of Defence to conclude a Memoranda of Understanding. The purpose being to provide vital reassurance as to the Government's commitment to the security of Gemfields' people and assets in Mozambique whilst also recognising the necessity of respect for human rights via the application of the VPSHR.

In relation to the insurgency, there is also significant concern that insurgents have and will seek to infiltrate the districts where we operate by posing as illegal miners or participating in illegal mining to finance the insurgency.

Illegal miners and trespassers continue to present a serious concern at the Mozambican operations. For context, between 800 and 1,200 illegal miners/trespassers continue to be recorded at the Mozambican operations on a daily basis. At MRM over the course of 2024 and 2025, there has been a significant increase in organised, large-scale groups of illegal miners intruding onto MRM's license areas, with some entering active mining pits climbing on machinery and threatening MRM operational personnel. This situation poses significant risks to Gemfields assets, employees, contractors, community members, and the illegal miners themselves. MRM is in the process of commissioning of a new processing plant ("PP2"). Unfortunately, there has been significant ongoing sabotage of the plant supply infrastructure by illegal miners, contributing to delays in PP2's commissioning.

Gemfields has called upon the Mozambique authorities to take more proactive measures against the syndicates who finance, facilitate and encourage the illegal trade in rubies. Illegal miners are often brought to Montepuez from out-of-province, for example Nampula and Tanzania. The syndicates offer them the "opportunity" of being brought to Montepuez in return for owing money or rubies to the syndicates. Efforts continue to engage with the Minister of Mineral Resources and Energy, Estevão Pale, and others in Government, to address the issue of illegal mining and the illegal syndicates who support it. Gemfields has long advocated amending the mining law to close the current loopholes, which are being exploited by the illegal syndicates, and which currently make it lawful to export stolen and illegally mined rubies. Gemfields would like to see it be made illegal for any party to export a rough, uncut, ruby unless that party is the holder of a valid ruby mining concession under the terms of the mining law, promulgating clear advantages to the people of Mozambique of such a change of law.

In addition to lobbying the Mozambican authorities, Gemfields is seeking pursuing multi-stakeholder initiatives to bring about improvements in the rule of law in Northern Mozambique.

In October 2025 a group of approximately 40 illegal miners marched on the mine gate at MRM. They proceeded to attack Mozambican police officers present at the gate, killing two, one of whom was a commander of Mozambique's Natural Resources Protection Force. MRM has been informed that the attack may be related to district immigration authorities investigating, earlier in the day, suspected illegal immigrants in a local village and during which it is reported that an individual died¹ MRM provided photos and videos of the perpetrators to the authorities to allow investigation and proper resolution.

Illegal mining is extremely dangerous due to the unconsolidated gravel nature of the deposits in Mozambique. For example, in 2025, there were eight illegal miner deaths due to illegal miner pit

¹ [20251016-GGL-Two-Mozambique-police-officers-killed-by-illegal-miners-at-MRM.pdf](#)

collapses, seven at MRM and one at Eastern Ruby Mining (“**ERM**”) (an exploration project, 80% owned by Gemfields). MRM continues to address this issue through ongoing education and communication with local communities about the dangers of illegal mining, collaboration with authorities, and the implementation of enhanced security measures to reduce the presence of illegal miners and trespassers. It is clear, though, that more needs to be done.

As part of Gemfields’ ongoing commitment to transparency in relation to major incidents, MRM sent media advisories to local media and Mozambican dignitaries to inform them of incidents occurring on the concession. In 2025, this included, in relation to illegal miners, eight due to illegal miner pit collapse (seven at MRM and one at ERM), eight due to gunshot wounds and two due to aggravated homicide (assault) by fellow illegal miners.

During 2025, ten representations were made to the Police Provincial Commander or Director of Order and Public Security in Mozambique. These representations were made with the aim of addressing the root cause behind illegal mining, the illegal syndicates who finance illegal trade in the stones. The representations requested the support of the police, Immigration department, Customs, Border Force, and the investigative agency, Serviço Nacional de Investigação Criminal (SERNIC) to arrest foreign syndicate leaders and middlemen.

Gemfields is conscious that much of this VPI Annual Report cover matters in Mozambique. The situation in Mozambique remains much more complex and challenging for Gemfields than that in Zambia, particularly as it relates to VPSHR issues given the twin threats in Mozambique of the insurgency and increased illegal mining. However, Kagem is not without its challenges in respect of illegal mining and Kagem’s efforts in implementing the VPSHR in Zambia are set out above. Kagem is pursuing a number of projects in the local communities aimed at addressing some of the underlying issues associated with illegal mining, with a view to improving the lives of the communities and Kagem’s community relations. These include a fish farming cooperative, a Polytechnic, a health clinic and a secondary school.