	STANDARD POLICY	Document ID	TNCL-HRE-POL-0006
		Document owner	Human Resources Manager
	HUMAN RIGHTS POLICY STATEMENT	Revision	00
		Approve Date	13 th January 2026

Human Rights Policy Statement

INTRODUCTION

Tembo Nickel Corporation Limited, along with its subsidiaries and group companies, (“Tembo Nickel” or the “Company” or “we”) recognizes that all individuals are equally entitled to human rights without any discrimination.

Human rights are the universal political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination on any basis as defined by the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

RESPONSIBILITY AND ACCOUNTABILITY

This Policy applies to all Tembo Nickel employees, including those temporarily assigned to perform work or services for the Company, consultants, officers, and directors. Failure to comply can result in disciplinary action, including termination of their engagement. The Company expects everyone to respect human rights by adopting responsible business practices and to cooperate with Tembo Nickel’s ongoing human rights due diligence and report any suspected violations.


Tembo Nickel’s Board oversees our compliance with this Policy, which may be delegated to one or more Committees.

OUR COMMITMENT

Tembo Nickel is committed to:

- respecting human rights, which includes avoiding infringing on the rights of people and addressing any adverse impacts the Company causes, contributes to or to which it is directly linked.
- aligning the manner in which we conduct our business with the UN Guiding Principles on Business and Human Rights, the principles outlined in the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Global Compact, the Voluntary Principles on Security and Human Rights, the UN Declaration on the Rights of Indigenous Peoples (including self-identifying indigenous people) and other international frameworks that support good environmental and social practices and ongoing human rights due diligence.

Where there is a disparity between local legislation, customs, norms or rules and international standards, the Company seeks to apply to the higher standard.

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OUR APPROACH

Human Rights Based Approach

We aim to maintain a rights-based approach in our business activities and supply chain. We will integrate human rights norms and standards into our processes, including engaging with impacted people to obtain and incorporate their views.

The approach includes identifying, assessing, tracking and communicating on salient human rights issues and impacts related to our activities including, but not limited to:

- Respect for the core labour rights in the ILO Declaration on Fundamental Principles and Rights at Work for the Project's workforce, including non-discrimination in the workplace; freedom of association and collective bargaining; freedom from all forms of forced labour and modern slavery; freedom from child labour; and safe and healthy working conditions.
- Conduct due diligence on our contractors to promote respect for workers' rights in the Project's workforce and supply chain.
- Respect for communities, including land acquisition, resettlement and ongoing management of environmental and social impacts.
- Implement the Voluntary Principles on Security and Human Rights in its interactions with public and private security forces.

Human Rights Due Diligence

Prior to entering in to new business relationships, including in our supply chain, we will conduct human rights due diligence, which includes identifying and assessing actual and potential impacts of our operations on people and communities as a result of business relationships; integrating and taking appropriate actions aimed at preventing, mitigating or eliminating adverse impacts; tracking the effectiveness of actions taken; and communicating to stakeholders on how adverse impacts are being addressed.

Stakeholder Engagement

Tembo Nickel Corporation Limited aims to engage in a meaningful way with internal and external stakeholders, including people whose human rights may be impacted by our activities.

Tembo Nickel also recognizes the importance of broader multi-stakeholder dialogue and cooperation between companies, government and civil society partners to catalyze collective action and enhance respect for human rights in the mining sector and in the local communities where we operate.

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Access to Remedy and Grievance Management

In accordance with the UN Guiding Principles on Business and Human Rights effective criteria, we will ensure access to appropriate remedies for human rights issues, via grievance mechanisms and by cooperating with legitimate and culturally appropriate processes to support remedies, when necessary



03/06/2026

Benedict Busunzu
COO - Tembo Nickel.






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Final Audit Report

2026-06-03

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