

## Dalradian's Human Rights Commitment

Dalradian's vision is to build a modern mine that draws on Tyrone's heritage of engineering and manufacturing excellence to drive economic growth and community development in the local area and beyond. We understand that our business affects people in the region surrounding our project. We are therefore committed to motivate, encourage and ensure our business respects and promotes human rights and we believe respecting human rights and contributing to the positive realisation of rights is important for the sustainable operation of our business. We recognise:

- Human rights are universal rights inherent to us all, regardless of nationality, marital status, sex, sexual orientation, race, national or ethnic origin, colour, religion, language, political opinion, disability, age or any other protected characteristic.
- Human rights include those in the Universal Declaration of Human Rights<sup>i</sup> and the ILO Fundamental Principles and Rights at Work<sup>ii</sup>. They range from the most fundamental - the right to life - to those essential for everyday life, such as the rights to food, education, work, health, and liberty. Workers' rights are also covered. We operate in the United Kingdom, which has robust legislation and is well-regulated, for example, with respect to labour laws, health & safety and the environment.
- All business enterprises are expected to respect human rights and this is independent from the obligations placed on states. Businesses should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved. If abuses occur, victims must have access to effective remedy through judicial and non-judicial mechanisms.
- Dalradian has the potential to impact human rights across our operations and beyond. As one of the larger private sector employers in the area, the way we operate our business affects our employees, contractors, the communities we work in and others across our supply chain.

We take responsibility for our impact. We are committed to:

- **Respecting internationally recognised human rights.** The UN Guiding Principles on Business and Human Rights<sup>iii</sup> sets out a framework for this and guides us in our efforts.
- Setting out clearly for our employees and contractors expected standards of behaviour in policies such as our Business Conduct & Ethics Policy and Anti-Corruption & Bribery Policy.
- Providing secure and appropriate means to report incidents of suspected or actual misconduct and wrongdoing: complaints can be submitted in writing to our Community Relations Manager via email to [community@dalradian.co.uk](mailto:community@dalradian.co.uk) or post to 67 Main Street, Gortin, County Tyrone, BT79 8NH, Northern Ireland.
- Combatting all forms of **discrimination and harassment** on the basis of gender, ethnicity, age, disability, religion, sexual orientation or any other factor as described in our Equal Opportunities, Dignity at Work, Bullying and Harassment, Family Friendly and Flexible Working policies. We work to cultivate an inclusive work culture.
- Providing a **healthy and safe working culture and environment** for our employees and contractors. We have a zero-tolerance vision for accidents at work and our Health & Safety Policy sets out our approach for achieving this. Dalradian has been accredited as an Investors in People (IIP) company since

2019 and advanced to the gold standard in 2022, recognising that we have the policies in place which reflect our commitment to our employees and that those policies are successfully guiding our daily work.

- Ensuring the **health and safety of communities** affected by our business.
- Implementing systematic and comprehensive environmentally responsible practices through all phases of the mining cycle.
- Respecting the role of people who act to promote or protect human rights in a peaceful manner. We do not accept any type of physical or psychological attacks, and we expect the same from our business partners and other stakeholders.

**We continue to learn and improve. We do this by:**

- Ensuring strong and transparent **human rights governance** with clear responsibilities and accountabilities supported by proper funding and resources. Part of this governance is our annual Responsible Business Report, which was initiated in 2019 and upgraded in 2020 to report against the Sustainability Accounting Standards Board (SASB) framework.
- Delivering **training** to staff across relevant functions in support of the implementation of this Human Rights Commitment.
- Prioritising **engagement** with local communities and a diverse range of **stakeholders** to develop and sustain relationships of trust and transparency, for example by collaborating on common challenges with our peers through memberships of a variety of organizations such as Mineral Products Association of Northern Ireland, Irish Mining and Quarrying Society, Northern Ireland Chamber of Commerce, Critical Minerals Association and Manufacturing NI. We engage with a broad range of community groups through our community funding organization, the Dalradian Community Fund and meet regularly with the committee of the fund, which has a majority of non-Dalradian community leaders, to identify community needs and priorities and to allocate funds to those initiatives most desired by the local community. The fund's committee also provides a regular and important forum for discussion and information sharing between our operations and our local communities.
- Conducting periodic audits or **reviews** of our compliance with this Human Rights Commitment in an effort to continuously improve our human rights performance.

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i <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

ii [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/normativeinstrument/wcms\\_716594.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/normativeinstrument/wcms_716594.pdf)

iii

[https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)