

IVANHOE
MINES



Human Rights Policy

Table of Contents

Introduction.....	3
Policy Statement	3
Ivanhoe Mines' Commitment to International Standards	4
Specific Requirements.....	6
Corporate Policies.....	6
Site Processes and Plans	6
Human rights management framework between Sites and Corporate levels.....	7
Identification of human rights risks	7
Integrating human rights risk management	7
Tracking human rights risk management	7
Communicating performance.	7
Provision of remedy for adverse human rights impacts	8
Related Documents	8

Introduction

The purpose of this Policy is to describe Ivanhoe Mines Ltd.'s (Ivanhoe or Ivanhoe Mines) commitment to respecting human rights and the conduct expected from all personnel and partners in order to realize this commitment. The Policy is designed to ensure proper understanding and effective use and integration of Ivanhoe's human rights-related management systems within the context of Group and Site policies, international standards, and Ivanhoe's culture of responsible and accountable corporate citizenship.

Policy Statement

Ivanhoe is committed to respecting human rights in line with the *United Nations Guiding Principles on Business and Human Rights* (UNGPs) and other Good International Industry Practices (GIIPs) and legislation in the host countries where we operate. We commit to respecting all universally accepted human rights, and specifically the equality and dignity of all people, and upholding the corresponding obligation of non-discrimination.

The responsibility to respect human rights is a fundamental operating principle embedded in Ivanhoe's Statement of Values and Responsibilities. In committing to the UNGPs and GIIPs standards, Ivanhoe acknowledges its responsibility to avoid infringing on the rights and freedoms of all individuals, whether directly through our activities, products, and services; or indirectly through our business relationships.

In our commitment to upholding the UNGPs, Ivanhoe recognizes our responsibility to address adverse impacts on people, which we have caused or have contributed to.

The scope of our responsibility encompasses not only our employees and the communities impacted by our operations and projects (Sites), but extends to the stakeholders affected by the relationships and activities in our value chain.

Ivanhoe furthermore pays special attention to the rights of vulnerable groups, including women, children, people with disabilities, Indigenous Peoples, migrant workers, older persons, people discriminated against on the basis of decent, case, race and other vulnerable groups that may be identified in our context.

The UNGPs specifically require that Ivanhoe "knows and shows" that we respect human rights, and that we do so through the implementation of ongoing human rights due diligence.

Ivanhoe acknowledges that the risk of being linked to adverse human rights impacts is particularly high in certain contexts, which may include the environments where we operate and the particular business activities we conduct.

This heightened risk requires proportionate levels of human rights due diligence.

To ensure implementation of our commitment to respect human rights at the Site-level, Ivanhoe intends to establish robust procedures aligned with the UNGPs to identify adverse human rights impacts (both actual and potential), integrate measures to manage these impacts, track and communicate our implementation of these management measures, while working to remedy any adverse human rights impacts we may cause or contribute to.

Ivanhoe will ensure that all relevant personnel, and those directly linked to the organization's operations, including internal and external security personnel, are provided with appropriate cultural and human rights training and guidance (including the content of this Human Rights Policy), to ensure consistency of human rights application, and to foster their capacity to respond appropriately when unforeseen situations arise.

Human rights requirements are embedded in all major contractor and supply chain agreements.

Ivanhoe Mines' Commitment to International Standards

Through our commitment to the *United Nations Guiding Principles on Business and Human Rights*, we aim to ensure that these principles are integrated throughout our policies and processes which are designed to identify, assess and mitigate and/or remediate human rights risks across our Sites and value chain. Through ongoing monitoring, reporting, and transparent dialogue with stakeholders, we commit to ensuring a responsible and ethical business environment and seek partnerships with entities that share our commitment.

Beyond the UNGPs, Ivanhoe's commitments encompass a wide range of internationally recognized human rights as defined in the *International Bill of Human Rights* – which includes the

Universal Declaration of Human Rights; the *International Covenant on Civil and Political Rights*; and the *International Covenant on Social and Cultural Rights*.

Depending on the context, we also rely on other international human rights instruments, standards and tools, including the *Convention on the Rights of Persons with Disabilities*, and the *UN Global Compact*.

We specifically commit to the *International Labor Organization's Declaration on Fundamental Principles and Rights at Work* (ILO Declaration) which includes a commitment to freedom of association and the effective recognition of the right to collective bargaining.

Also included in the ILO Declaration is a commitment to ensuring that we maintain a safe and healthy working environment free from discrimination and harassment. Further, Ivanhoe will not tolerate, and endeavors to identify and eliminate from its supply chain, instances of child labor, any form of forced, compulsory or bonded labor, human trafficking or any other form of slavery.

As a public company listed on the Toronto Stock Exchange, Ivanhoe is also committed to comply with Canadian legislative requirements, including the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (S.C. 2023, c.9). Ivanhoe maintains a zero-tolerance approach to forced and child labor regardless of with whom we work and where we do business. We are committed to complying with all relevant laws concerning forced and child labor in all the countries where we operate and to preventing forced and child labor throughout our network of suppliers.

Diversity is entrenched in our organizational culture, which seeks to maintain an inclusive working environment and encourages respect and tolerance of differences.

In line with the *Voluntary Principles on Security and Human Rights*, we are committed to ensuring that private and public security providers' activities linked to Ivanhoe's Sites are aligned with international best practice, including the responsible and proportionate use of force. Through the implementation of proper policy and accompanying capacitation, Ivanhoe strives to ensure that its security providers understand and meet their responsibility to respect human rights in the context of security provision.

We recognize the importance of the *IFC Performance Standards*, which have strongly influenced our guidelines and procedures in social and environmental performance related to human rights, including by ensuring a safe and healthy working environment; respecting the legal and customary rights of landowners; and recognizing the need to avoid or mitigate resettlement where reasonably possible, and providing fair and just compensation where not.

Specific Requirements

Corporate Policies

Ivanhoe has established a range of corporate policies to support adherence with this Human Rights Policy. These policies apply at all of our Sites. They also cover all activities and functions across the business, and the Sites. A non-exhaustive list of these policies can be found in Page 8 of this Policy.

Site Processes and Plans

At each Site, Ivanhoe commits to adherence with corporate-level policies, while also developing and implementing site-specific processes and plans to support Ivanhoe's commitment to human rights. All Sites must have specific processes and plans to respond to human rights risks related to labor, environmental and social impacts; stakeholder engagement; grievance management; security; risk; procurement; human resources; and health and safety.

To ensure compliance with corporate-level policies, a series of monitoring, evaluation and reporting procedures are required at Site-level. These requirements are designed to ensure effective implementation of this Human Rights Policy at the Site-level, ultimately fostering a culture of accountability and responsibility towards human rights.

We are committed to implementing the *Global Industry Standard on Tailings Management* (GISTM) by ensuring comprehensive tailings management

practices which focus on Site-affected people in order to respect human rights. According to that standard, a due diligence process is required to identify and address those people most at risk from a tailings facility or its potential failure.

We strive to align to *ISO 14001*, *ISO 45001* and *ISO 9001*, which provide comprehensive frameworks for environmental, occupational health and safety management and quality assurance, respectively.

Ivanhoe has also incorporated the requirements of the *ICMM Mining Principles* and furthermore supports human rights by implementing policies and practices to respect the rights and interests of women that reflect gender-informed approaches to work practices and job design and that protect against all forms of discrimination and harassment and any behaviour that adversely impact on women's successful participation in the workplace; by implementing policies and practices to respect the rights and interests of all workers and improve workforce representation in the workplace so it is more inclusive; by ensuring that the Company remunerated employees with wages that represent a competitive wage within the job market and assign regular and overtime working hours within legally required limits.

Our principles, policies, and practices outlined in this Policy are also aligned to the requirements of the *RMI Copper Mark*.

Human rights management framework between Sites and Corporate levels

Identification of human rights risks

All personnel should be equipped with the necessary information and awareness to identify and address adverse human rights impacts associated with their work. Sites must ensure the presence of relevant competent personnel to uphold this standard. An independent human rights risk assessment (HRIA) should be undertaken at least every five years, and Sites must develop annual human rights action plans that are actively maintained. These plans will be monitored and evaluated, and any material change in the social context will trigger increased frequency of HRIAs. Sites should consult with affected and potentially affected people, and have resources to monitor, manage and mitigate human rights risks. Resource allocation should be based on the risk assessments to adequately address salient human rights risks.

Integrating human rights risk management

The Corporate Sustainability Team oversees the adoption and implementation of this Policy. Human rights planning is an ongoing process which involves collating human rights data, knowledge, and management plans and should involve the input of affected stakeholders where reasonably possible. Ivanhoe will work to integrate findings from impact assessments across relevant Company processes, and such findings should inform impact management actions.

Tracking human rights risk management

All Sites should develop human rights targets and indicators that support the Group targets and involve affected stakeholders in the monitoring and evaluation of impact management. Sites should aim to provide monthly check-in reports and consolidated annual reports to Corporate on Standard Operating Protocols. Ivanhoe's wider human rights performance will be communicated through sustainability reporting, and while Sites and business functions should be directly responsible for managing human rights, ultimate accountability lies with the Corporate Sustainability Team.

Communicating performance

We will report publicly on the material adverse human rights impacts we have identified, how we plan to manage such impacts, and our performance in this regard through our annual sustainability reporting. We will also ensure ongoing engagement with stakeholders who are or may be adversely impacted by our activities or business relations.

Provision of remedy for adverse human rights impacts

Access to effective remedy is a core component of the UNGPs. We commit to providing access to remedy by maintaining functioning, accessible, and effective grievance mechanisms that enable stakeholders, particularly affected rightsholders, to raise concerns regarding adverse impacts arising from our activities and business relationships.

Where we determine that we have caused or contributed to an adverse human rights impact, we will provide for, or cooperate in, relevant investigations and processes to enable appropriate remediation. We may also play a role in the remediating process for harms that are directly linked to our products, services, or relationships.

Related Documents

At the corporate-level, Ivanhoe's policy environment provides for further linkages with human rights, and this Policy shall be read with the following non- exhaustive list of policies, as delineated below:

Ivanhoe Mines Code of Business Conduct and Ethics

Ivanhoe Mines Companion Booklet to the Code of Business Conduct and Ethics

Ivanhoe Mines Our Corporate Citizenship – Statement of Values and Responsibilities

Ivanhoe Mines Grievances Policy

Ivanhoe Mines Community Relations Policy

Ivanhoe Mines Group Victimisation Policy

Ivanhoe Mines Sexual Harassment Policy

Ivanhoe Mines Managing Diversity Policy

Ivanhoe Mines Occupational Injuries and Diseases Policy, SA

Ivanhoe Mines Sustainability Policy



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This policy has been approved by Ivanhoe Mines Ltd.'s Board of Directors

Board Approval Date: October 2024

Published by: Ivanhoe Mines Ltd. Sustainability Department

Doc ID: 1061-IVM-0000-SS-POL-0001

Rev No: 01

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