

Human Rights Policy

1. Purpose

Liontown Resources Limited (Liontown) is committed to respecting the human rights principles outlined in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights; the International Covenant on Economic, Social, and Cultural Rights; the International Covenant on Civil and Political Rights; the International Labour Organization's Declaration on Fundamental Principles and Rights at Work) and the United Nations Declaration on the Rights of Indigenous Peoples.

The Company is conscious that human rights must be respected and upheld across all of its operations, its business relationships and throughout its supply chain. This includes the rights of all people - our employees, contractors, local communities and suppliers.

2. Scope

This Policy applies to Liontown's Board, Management, employees, contractors and suppliers.

3. Policy Commitments

Liontown is committed to ensuring that human rights – the rights and liberties we are all entitled to as human beings – are recognised and protected. The Company will strive to prevent any detrimental impact on human rights resulting from its operations, business relationships, and through its supply chain, and if prevention is unsuccessful, it will seek to remedy any detrimental impact commensurate with its level of involvement. We believe that our business can only prosper when we protect and respect human rights.

3.1 Human Rights in the Workplace

- a. Establish an open, trustworthy, and respectful relationship with employees and contractors;
- b. Maintain effective grievance mechanisms that allow employees and contractors to file complaints or concerns without fear of intimidation or retaliation;
- c. Allow employees and contractors to access freedom of association and the effective recognition of the right to collective bargaining;
- d. Value diversity and inclusion of all people across the Company;
- e. Ensure gender pay equity in like for like positions;
- f. Provide a workplace that is safe from physical and mental harm;
- g. Never knowingly participate in forced labour or child labour;
- h. Monitor potential human rights risks and actual negative human rights impacts in the workplace;
- i. Comply with all workplace laws.



3.2 Human Rights and Native Title Holders

- a. Abide by the terms of Native Title Agreements that relate to the Company's tenements, including actions that address communication; land and water management; Aboriginal heritage management; cultural awareness; access; compensation; social opportunities and development, and employment and contracting;
- b. Engage with all Native Title Holders in a manner that is aligned with the Free, Prior, and Informed Consent (FPIC) process;
- c. Maintain effective grievance mechanisms that allow Native Title Holders to file complaints or concerns without fear of intimidation or retaliation;
- d. Monitor potential human rights risks and actual negative human rights impacts to Native Title Holders
- e. Comply with all relevant legislation, and, where appropriate, exceed these obligations where statutory heritage protection government instruments may not adequately address the Native Title Holder's customary law or cultural values.

3.3 Human Rights in the Supply Chain

- a. Communicate with suppliers to encourage alignment with the Company's expectations of responsible human rights practices;
- b. Establish and maintain an effective grievance procedure that allows internal and external stakeholders to submit identified Modern Slavery risks in the supply chain without fear of intimidation or retaliation;
- c. Monitor potential human rights risks and actual negative human rights impacts in the supply chain;
- d. Comply with Australia's *Modern Slavery Act (2018)* Cth.

3.4 Future Commitments

The Company will:

- a. Undertake a human rights risk assessment that will identify and assess potential human rights risks and actual human rights impacts throughout its supply chain and its own operations;
- b. Update the human rights risk assessment periodically including, at minimum, in the case of significant changes in its operations or its supply chain;
- c. Provide affected stakeholders with the opportunity to review and consult on relevant key human rights issues;
- d. Formalise a human rights due diligence and remediation process to identify, prevent and mitigate human rights risks and actual impacts throughout its supply chain;
- e. Review its complaints and grievance mechanisms to ensure alignment with the United Nations Guiding Principles on Business and Human Rights, and
- f. Incorporate human rights training to relevant internal and stakeholders

3.5 Disclosure

- a. Liontown will annually report its human rights performance through globally recognised sustainability reporting standards and frameworks including the Global Reporting Initiative (GRI) Standards; Sustainability Accounting Standards Board (SASB) Standards and the Sustainable Development Goals (SDGs) framework;
- b. Undertake self-assessment against the Initiative for Responsible Mining (IRMA) Standard for Responsible Mining;
- c. Work towards incorporating the relevant human rights related Towards Sustainable Mining (TSM) protocols into its ESG reporting suite;



- d. Submit a Modern Slavery Statement to the Australian Border Force on reaching the required reporting threshold.

4. Supporting Doctrines

- a. [International Bill of Human Rights](#) - consisting of:
 - [Universal Declaration of Human Rights](#);
 - [International Covenant on Economic, Social, and Cultural Rights](#);
 - [International Covenant on Civil and Political Rights](#)
- b. [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#). This includes the core labour conventions applicable to the Company's operations and supply chain:

Freedom of association and the right to collective bargaining

- Freedom of Association and Protection of the Right to Organise Convention (No.87), 1948
- Right to Organize and Collective Bargaining Convention (No.98), 1949

Forced Labour

- Forced Labour Convention (No.29), 1930
- Abolition of Forced Labour Convention (No. 105), 1957

Child Labour

- Minimum Age Convention (No. 138), 1973
- Worst Forms of Child Labour Convention (No. 182), 1999

Discrimination in Respect of Employment and Occupation

- Equal Remuneration Convention (No. 100), 1951
- Discrimination (Employment and Occupation) Convention (No. 111), 1958

- c. [United Nations Declaration on the Rights of Indigenous Peoples](#)
- d. [United Nations Guiding Principles on Business and Human Rights](#)

5. Related Policies

- a. Code of Conduct
- b. Health and Safety Policy
- c. Diversity Policy
- d. Aboriginal Engagement Policy
- e. Whistleblower Protection Policy
- f. Climate Change Policy

6. Responsibilities

The Board is responsible for the oversight of human rights as part of the Company's strategy, and the Management team is responsible for implementation of human rights considerations throughout its operations, business relationships and supply chain.



7. Review of this Policy

This Human Rights Policy is to be reviewed annually and updated as required.

Policy Ref.	Policy Name	Version	Author	Approving Authority	Reviewed and/or Approved Date
P-27	Human Rights Policy	1	Clair Wilson, Manager Environment, Social, Governance	Board of Directors	23 November 2023

