

# Human Rights Policy

This policy defines The Metals Company (TMC)'s commitment to respecting the human rights<sup>1</sup> of our employees, partners, people from our sponsoring states and other related parties who may be affected by our activities.

## SCOPE

We require all employees and contractors of The Metals Company and its subsidiaries to understand, respect, and act in accordance with the commitments in this policy. We require our suppliers to comply with our Supplier Code of Conduct and encourage all of our business partners in the value chain to endorse similar commitments to those included in this policy.

## OUR APPROACH

We recognize that our operations and supply chain could potentially pose risks to human rights and strive always to understand and adequately manage these risks. We study the environmental and social impacts of our future operations and encourage open dialogue with all stakeholders to identify potential human rights-related risks. We engage with potentially affected people and other interested parties about the findings and strive to incorporate their feedback in our management plans to eliminate or mitigate potential risks.

We have developed our human rights policy based on the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. We have also considered the Responsible Minerals Initiative (RMI) Risk Readiness Assessment, the United Nations Global Compact, the Equator Principles, and the International Finance Cooperation (IFC) Performance Standards.

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<sup>1</sup> We understand the term human rights in accordance with the International Bill of Human Rights (which comprises the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social, and Cultural Rights) as well as the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

## OUR COMMITMENTS

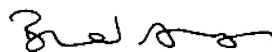
1. **Comply with all applicable regulations** in the jurisdictions relevant to our operations and use our influence to promote the respect of human rights in the deep-sea marine minerals industry.
2. Periodically **assess human rights risks and impacts** associated with our activities and implement measures that aim to ensure that we, our suppliers, business partners, and other related stakeholders do not cause or contribute to human rights abuses.
3. **Implement due diligence mechanisms** to identify, mitigate, and manage exposure to human rights risks in our operations and supply chain.
4. Foster a **corporate culture** based on respect, inclusion, and equal opportunities for all. We have zero tolerance against sexual harassment and discrimination *against any individual on the basis of race, religion, ethnicity, national origin, color, gender, age, sexual orientation, citizenship, disability or any other legally protected characteristic unrelated to an individual's job performance.*
5. Respect our workforce's rights to **freedom of association and collective bargaining**.
6. Collaborate with our partners and contractors to use the hierarchy of controls in our operations to **protect the health and safety** of our workforce, contractors, and other stakeholders who may be affected by our activities in line with our Health and Safety Policy commitments.
7. Oppose all **child labour**<sup>2</sup>, **forced labour**, **human trafficking**, or any other form of modern slavery<sup>3</sup> and seek to identify and eliminate associated risks in our supply chain.
8. Maintain an operational **grievance mechanism** accessible to all stakeholders.
9. **Investigate potential or actual human rights violations** directly linked to our operations and, if applicable, collaborate with relevant parties and/or authorities to provide remedies.
10. **Communicate transparently** on our human rights impacts, and effectiveness of our management measures.

## REPORTING

Any employee who becomes aware of any suspected or actual violation of this Policy or the law is obligated to report the violation to their manager, TMC's General Counsel, or the [Company's Whistleblowing Hotline](#)<sup>4</sup>. Any person—whether internal or external to TMC—may report to the hotline any concern or suspected policy violation on an anonymous and confidential basis and without fear of reprisal.



**Gerard Barron**  
Chairman and Chief Executive Officer



**Brendan May**  
Sustainability and Innovation Committee Chair

The respect of human rights within TMC's sphere of influence rests on the ethics and integrity of all TMC employees and collaborators. The Sustainability & Innovation Committee of The Metals Company's Board of Directors is responsible for the governance of human rights and to oversee compliance with this policy. We review this policy on an annual basis.

Approved on June 20, 2024

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<sup>2</sup> Defined as children under 18 years old or otherwise specified by applicable regulations in the jurisdictions where we operate.

<sup>3</sup> As defined by Canada's Modern Slavery Act

<sup>4</sup> The international number of TMC's Ethics Hotline is 001-(833) 626-1527. The Ethics Point website provides more information: <https://secure.ethicspoint.com/domain/media/en/gui/80968/index.html>.