



РУДНИК ЗА БАКАР | COPPER MINE
БУЧИМ | BUCIM

HUMAN RIGHTS POLICY

Identification Number: POL.000.001
Effective Date: 23 March 2026



Human Rights Policy

Identification Number: POL.000.001

Effective Date: 23 March 2026

Brief Description

This Policy sets out the fundamental principles, commitments and requirements for the protection of and respect for human rights across the operations of Solway Group. The Policy establishes the framework through which DPTU Bučim DOOEL Radovish, as part of the Group, applies the principles of respect for human rights in its business activities and relationships with employees, business partners and stakeholders.



РУДНИК ЗА БАКАР
БУЧИМ | **COPPER MINE
BUČIM**

> | Table of contents:

1 Purpose	pg. 4
2 Objectives	pg. 4
3 Range	pg. 4
4 Related Applicable Documents	pg. 5
5 Our Commitments	pg. 5
6 Procedures	pg. 6
6.1. Engagement, Information and Capacity Building	pg. 6
6.2. Risk Assessment	pg. 7
6.3. Due Diligence	pg. 7
6.4. Grievance Mechanism	pg. 7
6.5. Business Relationships	pg. 8
6.6. Procedures for Remediation of Human Rights Violations	pg. 8
7 Reporting and Monitoring	pg. 9
8 Definitions	pg. 10
9 Revision History	pg. 11

1 | Purpose

This Policy sets out Solway Group's public commitment to respecting internationally recognised human rights and establishes a framework for their implementation across the business activities of the Group and its subsidiaries, including DPTU Bučim DOOEL Radovich.

The Policy defines the fundamental principles and expectations regarding respect for human rights and applies to relationships with employees, business partners and other entities directly linked to our operations, products or services.

2 | Objectives

The objective of this Policy is to ensure that relevant human rights standards and practices are consistently, transparently and effectively integrated into the strategy, business activities and value chain of the Group and its subsidiaries.

The Policy establishes a framework for ongoing human rights due diligence, active stakeholder engagement and access to appropriate grievance and remedy mechanisms as an integral part of responsible business conduct.

3 | Range

This Policy applies to the business activities of Solway Group and its subsidiaries, including DPTU Bučim DOOEL Radovich.

The Policy shall be reviewed at least annually in order to reflect changes in the internal and external environment that may affect business activities and obligations related to respect for human rights.

This Policy applies to directors, managers, employees and other persons acting on behalf of Solway Group and its subsidiaries.

Where the Group or any of its subsidiaries holds less than 50% ownership or management responsibility, Solway Group shall seek to use its influence to encourage the adoption and implementation of the principles and requirements set out in this Policy.



4 | Additional Applicable Documents

In implementing this Policy, the following Solway Group documents, as well as the relevant internal policies and procedures of DPTU Bučim DOOEL Radovich, shall be taken into account:

- Solway Group Code of Conduct
- Sustainable Development Policy
- Solway Group Sustainability Management Standards
- Solway Group Grievance Mechanism Standards.

5 | Our Commitments

Solway Group, including DPTU Bučim DOOEL Radovich, is committed to respecting and promoting human rights throughout its business activities and supply chain. We operate in accordance with internationally recognised standards and strive to prevent any infringement of human rights. At the same time, we seek to create and share sustainable value with our employees, communities and all stakeholders.

We are committed to:

- Operating in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Complying with applicable national laws and regulations, as well as internationally recognised human rights standards. Where our internal standards exceed local legal requirements, we adhere to the higher standard. Where national legislation conflicts with international human rights standards, we comply with applicable legal requirements while seeking to respect the principles of internationally recognised human rights in accordance with the UNGPs.
- Promoting a culture of respect for human rights and establishing an open and transparent process for communication and consultation with stakeholders.
- Обезбедување работна средина без дискриминација, вознемирување или насилство, со нулта толеранција за каква било форма на злоупотреба или неправедно постапување врз основа на раса, пол, религија, етничка припадност, возраст, попреченост или друга лична определба.
- Providing a workplace free from discrimination, harassment and violence, with zero tolerance for any form of abuse or unfair treatment on the grounds of race, sex, religion, ethnicity, age, disability or any other personal characteristic.
- Ensuring fair and equitable working conditions, including appropriate and fair remuneration, safe working conditions, and respect for the right to freedom of association and collective bargaining.
- Prohibiting all forms of child labour, forced labour and compulsory labour



throughout our operations and supply chain.

- Respecting the role of human rights defenders, including environmental, labour rights and community rights defenders. We do not tolerate threats, intimidation, harassment or retaliation against individuals who, in good faith, raise concerns or report potential violations.
- Ensuring security practices that respect human rights, in accordance with the Voluntary Principles on Security and Human Rights (VPSHR), including engagement with public and private security providers in a manner consistent with international human rights standards.
- Identifying, mitigating and managing environmental impacts in order to protect the health and well-being of local communities and ensure the responsible and sustainable use of natural resources.
- Providing accessible mechanisms for reporting and resolving grievances, through which employees, business partners and stakeholders may report potential human rights violations or other concerns related to our operations. All reports are reviewed in a transparent and fair manner, without fear of retaliation against individuals who, in good faith, raise concerns about potential violations.

6 | Procedures

In its operations, Solway Group and its subsidiaries, including DPTU Bučim DOOEL Radovich, apply principles and procedures to identify, manage and mitigate risks and potential adverse human rights impacts, as well as to provide for or support appropriate remedies where necessary.

These processes are implemented in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), with the aim of ensuring respect for human rights throughout our business activities, operations and supply chain.

6.1. Engagement, Information and Capacity Building

In order to better understand the local context and ensure effective stakeholder engagement, DPTU Bučim DOOEL Radovich, in accordance with the principles and standards of Solway Group:

- Promotes and develops an organisational culture based on respect for human rights within the Company and throughout the supply chain, through open, timely and continuous communication with stakeholders.
- Provides information and raises awareness of human rights-related matters through internal policies, programmes and activities, with the aim of fostering a shared understanding of these principles in the environments in which it operates.
- Develops and supports training, knowledge-sharing and capacity-building activities for employees, contractors, suppliers and other relevant stakeholders, with the aim of strengthening the application of human rights principles in business



operations.

6.2. Risk Assessment

In order to effectively identify, understand and manage human rights-related risks, DPTU Bučim DOOEL Radovich, in accordance with the principles of Solway Group:

- Identifies and assesses actual and potential human rights risks and impacts associated with its operations, business activities and supply chain, and takes appropriate measures based on the findings
- Conducts Human Rights Impact Assessments (HRIAs) within its operations, with particular attention to areas of heightened risk, including conflict-affected and high-risk areas (CAHRAs), followed by periodic reviews in accordance with relevant international guidance, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.
- Monitors and evaluates the effectiveness of established risk management procedures and measures and communicates how actual and potential human rights impacts are being addressed.
- Integrates the findings of risk assessments into the risk management system and into business and operational decision-making processes.

6.3. Due Diligence

DPTU Bučim DOOEL Radovich, in accordance with the principles of Solway Group and relevant international standards, applies a systematic human rights due diligence process to identify, prevent, mitigate and monitor potential or actual adverse human rights impacts associated with its operations and business relationships.

The due diligence process is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

As part of this process, DPTU Bučim DOOEL Radovich:

- Engages with stakeholders and rights-holders to better understand the potential human rights impacts of its activities.
- Conducts risk-based due diligence across its operations and supply chain to identify, prevent and mitigate adverse human rights impacts in a timely manner.
- Integrates the results of due diligence into the risk management system and into business and operational decision-making processes.
- Regularly monitors and evaluates the effectiveness of the measures taken and, where necessary, improves its risk management procedures and activities.

6.4. Grievance mechanism

DPTU Bučim DOOEL Radovich, in accordance with the principles of Solway Group, provides clear and accessible channels through which individuals, communities and other stakeholders may raise concerns or submit grievances related to our operations. Effective grievance mechanisms contribute to the timely identification and resolution



of potential adverse human rights impacts, while strengthening accountability, transparency and trust with stakeholders.

To this end, we:

- Provide accessible and effective reporting channels and grievance mechanisms through which stakeholders may submit grievances or complaints relating to the operations of the Company, its subsidiaries or business partners and request that they be appropriately reviewed and addressed.
- Seek to ensure that all grievances are reviewed and resolved in a timely, objective and fair manner. The process includes receipt and acknowledgement of the grievance, fact-finding and investigation, consideration of possible solutions, decision-making, feedback to the complainant and closure of the case.
- Encourage all individuals to report potential or actual human rights-related concerns and strictly prohibit any form of retaliation, reprisal or intimidation against persons who raise concerns in good faith or cooperate with investigations, regardless of the outcome.
- Protect reporting persons and complainants from adverse consequences, threats, harassment or legal retaliation. Knowingly false or malicious reports may be subject to appropriate disciplinary action.

6.5. Business Relationships

The decision to terminate a business relationship may constitute a significant measure within the due diligence process to ensure that our business activities do not cause, contribute to or are not directly linked to adverse human rights impacts. Where there are reasonable grounds to believe that a business partner is involved in serious human rights abuses or supports activities that are inconsistent with relevant international standards, DPTU Bučim DOOEL Radovich shall review the business relationship and, where necessary, take measures to restrict or terminate the relationship.

6.6. Procedures for Remediation of Human Rights Violations

DPTU Bučim DOOEL Radovich, in accordance with the principles of Solway Group, is committed to providing effective and equitable remediation for adverse human rights impacts that we have caused or contributed to. These procedures are implemented in accordance with applicable laws and internationally recognised human rights standards.

To this end, we:

- Seek to provide for, or cooperate in providing, appropriate remediation for adverse human rights impacts and actively engage with stakeholders to ensure transparent communication on how grievances are addressed and how the outcomes are integrated into the due diligence process.
- Seek to resolve grievances amicably and constructively. Where a grievance cannot be resolved through internal mechanisms, independent experts, mediators, neutral third parties or competent local and regional authorities may be involved in

order to identify an appropriate resolution.

- Recognise the right of complainants to pursue administrative, judicial or other legal remedies in accordance with applicable laws.
- Monitor the effectiveness of the measures implemented and analyse grievance outcomes in order to improve our policies, procedures and practices, as well as to strengthen our approach to the protection of human rights.

7 | Reporting and monitoring

DPTU Bučim DOOEL Radovich, in accordance with the principles of Solway Group, regularly reviews and evaluates its practices relating to respect for human rights and, where necessary, updates its policies and procedures to reflect developments in international standards and stakeholder expectations.

The Company is committed to transparent communication regarding its human rights-related activities, impacts and performance and regularly reports on these matters through relevant reports, corporate publications and disclosures on its official website.

DPTU Bučim DOOEL Radovich is committed to continuously improving its approach to respecting human rights and regularly monitors and evaluates the effectiveness of the procedures established to fulfil its obligations in this area.



8 | Definitions

Term	Definition
Human rights	Fundamental rights and freedoms to which all people are entitled, as established by international standards, including the Universal Declaration of Human Rights and the fundamental conventions of the United Nations and the International Labour Organization (ILO).
Adverse Human rights impact	A situation in which an action or omission results in the restriction, impairment or reduction of an individual's or group's ability to enjoy their human rights.
Grievance / complaint	A perceived injustice or dissatisfaction expressed by an individual or group, which may be based on law, contract, established practice, commitments made or general principles of fairness. For the purposes of this Policy, the terms "grievance" and "complaint" are used interchangeably.
Grievance Mechanisms	A formal or informal process through which individuals or groups may raise a grievance concerning potential or actual human rights violations related to business activities and seek their review and appropriate resolution.
Due diligence	A systematic process through which the Company identifies, assesses, prevents and manages actual or potential adverse human rights and environmental impacts associated with its activities, operations and supply chain.
Remedy mechanism	A process for addressing adverse human rights impacts and providing appropriate measures to remedy or mitigate them. The mechanism may include apologies, restitution, rehabilitation, financial or non-financial compensation, disciplinary or legal measures, as well as actions aimed at preventing the recurrence of the adverse impact.

9 | Revision History

Date	Version	Description of change
17.12.2024	1.0	Creation
23.03.2026	2.0	Revision

DPTU Bucim DOOEL Radovich

Adress

Marshal Tito b.b.

2420 Radovich

Republic of North Macedonia

+389 (032) 637 004

contact@bucim.mk

HUMAN RIGHTS POLICY

Identification no.: POL.000.001
Effective date: 23.03.2026



РУДНИК ЗА БАКАР БУЧИМ | COPPER MINE BUCIM