



SimFer Human Rights Impact Assessment

Progress update | March 2025

Purpose

In 2024, SimFer (hereafter “we”, “our”) engaged Article One, a specialised human rights and ethics consulting firm to conduct two human rights impact assessments (together, the HRIA). This includes one assessment of the Simandou Mine Blocks 3 & 4 (SimFer Mine) and one assessment of related infrastructure (i.e. the SimFer Rail Spur and SimFer Port, together the “Infrastructure”) in Guinea. The Article One HRIA summary report is available at <https://simfer-sa.com/en/disclosures/> (“Summary Report”).¹ This report provides an update on our progress against recommendations identified by Article One and published in the Summary Report.

Background

Our commitment to human rights is core to our values. It is fundamentally about treating people with dignity and respect – our employees and contractors, workers in our value chain, communities where we live and work and others affected by our activities and business relationships. The publication of the Summary Report is a first for the Project and for Rio Tinto and we believe that it demonstrates our commitment to respect human rights. We know that our activities, can both promote and negatively impact human rights. The HRIA has allowed us to better understand risks and impacts so that we can continue to strengthen and improve our processes and prioritise efforts on the most salient impacts to people.

Article One conducted their field work in June 2024, and while identifying several areas where we have made positive progress, they also noted inconsistencies in implementation and efficacy of some of our human rights management plans and made a number of recommendations. Article One noted that SimFer has made significant efforts to address these concerns since the conclusion of the assessment process.

We recognize that building a project of this scale, model and speed of development can create extra risks and challenges, which is why we take the findings seriously and have integrated the recommendations into our human rights due diligence approach. This is an ongoing process of identifying, preventing, mitigating and reporting risks and impacts. Progress on our human rights management plan and action plan which includes the HRIA recommendations is monitored by an internal, multidisciplinary collaboration committee.

We recognise that some issues are complex and ongoing, and our ability to mitigate certain impacts will be limited. We are committed to working with civil society organisations (“CSOs”), government, communities, business partners, suppliers and others to address shared challenges. We recognise that CSOs and other stakeholders are interested in how we respond to identified human rights risks and impacts. As part of our due diligence, we plan to provide annual progress reports on the implementation of the HRIA recommendations and our human rights management plan and conduct further risk and impact assessments as the Project evolves.

Article One – Salient themes and recommendations

The Summary Report identified 5 salient human rights themes, with 6 overarching recommendations and 21 specific recommendations grouped by theme for SimFer to implement. The themes are:

1. Labour rights – employees
2. Labour rights – contractors and workers in supply chain
3. Land access and use
4. Community health, safety and wellbeing
5. Grievance mechanisms

We have taken steps to address these recommendations while recognising many of them require an ongoing and multi-year approach to implementation as set out in Table 1.

Acknowledgment

By detailing the ways in which we have sought to implement Article One’s recommendations—as well as where we are yet to act—we seek to demonstrate accountability for our human rights impact. We are grateful to the many community members, employees, contractors, suppliers, CSOs, and others who took the time to participate in this HRIA. We believe the process and findings of this HRIA will help SimFer to embed an effective approach to human rights due diligence management.

¹ All defined terms in this progress update align with those in the Summary Report.

Table 1 - Progress update on recommendations – March 2025

The following section provides an update on each of Article One’s overarching and specific recommendations by theme. We have taken steps to address these recommendations recognising many of them require an ongoing and multi-year approach to implementation noting:

Implemented monitoring	12 recommendations have been implemented and progress will continue to be monitored as part of ongoing business practices. Examples of actions taken are set out below.
In progress	13 recommendations have implementation plans in progress. They are expected to be completed this year and will continue as part of ongoing business practices. Examples of actions taken are set out below.
Not started	2 recommendations are accepted, and we are currently developing plans for implementation in 2025.

Recommendations	Summary of recommendations	Status	Examples of actions taken
Overarching recommendations	1. <i>Fully implement the recommendations from the Environmental and Social Impact Assessments (“ESIAs”), Environmental and Social Management Plans (“ESMPs”) and the mitigations in the SimFer Human Rights Management Plan.</i>	In progress	In 2023, we established an internal cross-functional Human Rights Collaboration Committee that meets on a quarterly basis. The Committee is responsible for oversight of the implementation of SimFer Human Rights Management plan and any associated action plans. The Committee is also responsible for implementing recommendations from ESIA, ESMP, this HRIA and other commitments.
	2. <i>Continue to engage proactively and regularly with affected rightsholders, including employees, supply chain workers, Project Affected Persons (“PAPs”).</i>	Implemented – monitoring	We continue to identify ways to engage with a range of rightsholders and track our activities through a comprehensive stakeholder engagement plan. We regularly engage with employees and contractors through human rights training, and we are collaborating with Guinean civil society organisations (CSOs) and international CSOs through quarterly round table discussions. We have almost twenty community liaison officers, and five newly appointed security liaison officers working in impacted communities across the Rail Spur, Mine and Port locations who engage directly with project affected persons to receive feedback and monitor for concerns.
	3. <i>Continue to address security risks and impacts, including their root causes, for employees, supply chain workers and local communities.</i>	Implemented – monitoring	We are committed to implementing the Voluntary Principles on Security and Human Rights (VPSHR) as the key framework for managing security-related risks from a human rights perspective. The Project’s security team has developed a VPSHR strategy and have started VPSHR implementation through risk assessment and training activities. The VPSHR are being integrated into the Project’s security plans and the Community Safety and Security Plan. The VPSHR is also a key pillar of the Project’s overall Human Rights Management Plan. Further details are available in the ESIA.

Recommendations	Summary of recommendations	Status	Examples of actions taken
			VPSHR training has now been completed for security personnel at the port and will be refreshed on a regular basis. VPSHR training across all sites (Mine, Port, Rail Spur) continues to be implemented through regular training with public and private security forces, and through regular engagement with Guinean authorities.
	4. <i>Increase engagement with Winning Consortium Simandou (“WCS”) on human rights and partner with them to continue to address key environmental and human rights issues.</i>	In progress	Our governance mechanisms for engagement with WCS including monthly working group meetings to align and coordinate on activities including salient human rights issues such as working conditions and grievance mechanisms. Partnership with WCS also includes an integrated approach to social investments, livelihood restoration, and community engagement at the Port which supports in addressing key issues together.
	5. Continue to expand the framework for the provision of remedy for the SimFer Project, aligned with the UNGPs.	In progress	In 2025, further work is planned to provide more guidance related to remedy at a Project-level aligned with the United Nations Guiding Principles and other resources such as the Modern Slavery Response and Remedy Framework developed by Walk Free and the Human Rights Resource and Energy Collaborative. This will build on the learnings and framework developed for the compensation related to community property impacts. We are working with our contractors on how they remediate and respond to community complaints and incidents to promote consistency across the Project and alignment with the UNGPs.
	6. <i>Mitigate risks associated with the construction demobilisation phase of the Project, with a special focus on addressing impacts to vulnerable groups such as women, children and the elderly.</i>	In progress	We have developed and are in the process of implementing a construction demobilisation plan which includes engagement with key stakeholders (employees, Governments, CSOs, and communities) and the commissioning of a social impact assessment to identify and address social and human rights risks associated with demobilisation.
Theme 1: Labour rights – employees	7. <i>Progressively advance existing health and safety practices focusing on the most vulnerable workers. As part of this, prioritize efforts to improve road safety and transport options for workers.</i>	Implemented – monitoring	Our priority is the safety and well-being of our employees. We are implementing global standards to ensure a safe, inclusive, and respectful workplace for everyone on the Project. We have implemented several initiatives to progress workplace health and safety practices. Examples include: <ul style="list-style-type: none"> • Reviewing and modifying key health and safety tools so they are accessible to all employees regardless of literacy level and language. • Continuing to implement a range of health and safety critical risk management tools, job hazard analytics, medical check-ups and safe work procedures. • Sharing findings of incident investigations to continuously learn and improve our practices.

Recommendations	Summary of recommendations	Status	Examples of actions taken
			<ul style="list-style-type: none"> Managing road users access to project sites and reducing interaction between construction vehicles and community traffic and pedestrians Implementing a mass transport assurance program to improve the condition of busses transporting workers between local communities and work sites
	8. <i>Address language challenges related to staff management.</i>	Implemented – monitoring	SimFer operates using multiple languages and we put measures in place to promote an inclusive environment. A recent example is launching an online language learning software for all employees. In the field, our teams work to translate French and English into local dialects (Soussous, Malinkes, Koninakes, Poular etc.).
	9. <i>Provide sufficient resources to support the roll out of the Gender Diversity Strategy.</i>	Implemented – monitoring	Gender diversity is a priority across the Project, aligned with the Rio Tinto <i>Everyday Respect</i> initiatives and commitments. Female representation across the full SimFer Project workforce (contractors and SimFer) is 6% (1,057 women) and represents almost 15% of the primary workforce (not including contractors). Within SimFer, 66% of women are in executive or management roles and 34% are in skilled roles. Our Gender Diversity Strategy has been in place since 2023, with collaboration between the human resources and Communities and Social Performance (CSP) teams, implementing key initiatives and partnerships such as our partnership with <i>Women in Mining Guinea</i> . Another example includes reviewing our workplace facilities to seek to ensure they are safe and appropriate for women, including breastfeeding women.
Theme 2: Labour rights – contractors and suppliers	10. Conduct an audit to <i>address</i> ongoing issues of contractor and supplier non-compliance with Project Standards and contractual human rights obligations.	In progress	<p>The health, safety and wellbeing of our contracted workforce, including via sub-contractors, remains a critical priority for the SimFer Project. Our suppliers and contractors are required to comply with <i>The Way We Work</i>, our global code of business conduct and SimFer conducts regular inspections of work sites.</p> <p>We are working closely with our contractors and suppliers to improve performance and align with project standards through additional oversight, training, and coaching. As part of these efforts, we continue to strengthen assurance mechanisms and opportunities for contractor employees to report any breaches of <i>The Way We Work</i>. Examples of steps we have taken include:</p> <ul style="list-style-type: none"> Established a contractor monitoring program on workers' rights to seek to ensure compliance with the Project Standards, including addressing harassment risks and accessing employee grievance mechanisms. Collaboration with workers' committees so workers have a platform for representation and advocacy. Conducting bi-annual employment relations audits to review compliance of

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			<p>contractors with employment conditions and labour legislation (we have completed 2 audits since the program commenced in 2024).</p> <ul style="list-style-type: none"> Conducted monitoring missions to evaluate working conditions, implementation of commitments, provide training and awareness raising on human rights and lead on investigations where there are heightened areas of concern.
	<p>11. <i>Address ongoing concerns related to contractor and supplier wage rates. In doing so, work with suppliers to seek to ensure contractor and supply chain workers receive a living wage.</i></p>	In progress	<p>All contractors are required to pay their employees according to minimum standards, as set out by the SimFer Framework Agreement. This has been in effect since 2023 at the Mine and Rail Spur, including minimum wage which is set by Guinean legislation. We provide training to contractors and suppliers to assist them to understand and meet the Framework Agreement and our Supplier Code of Conduct which includes a requirement to provide fair remuneration and working conditions.</p> <p>We have commenced a review of salary remuneration rates and benefits available to our contracted workforce and we remain engaged with external stakeholders, including civil society organisations, on labour issues.</p> <p>The Industrial Relations (IR) team is facilitating the election of union delegates within contracting companies, in accordance with Guinean law. For non-unionized contractors, the IR team are working to assist in establishing workers' committees so that all workers have a platform for representation and advocacy.</p>
	<p>12. <i>Develop a program to support suppliers in conducting labour rights risk assessments of their operations.</i></p>	Not started	<p>We acknowledge that many of our contractors and suppliers do not yet have the capacity to conduct their own labour rights risk assessments. We are developing plans to identify ways to work with and support contractors and suppliers to establish appropriate processes to conduct their own labour rights risk assessments. We will develop a roadmap and supporting tools as we partner with suppliers, using a risk-based approach where there is a heightened risk of labour rights.</p> <p>This work will complement the SimFer led audits to address issues of contractor and supplier non-compliance with Project standards</p>
	<p>13. <i>Investigate and address risks of child and forced labour in SimFer's extended supply chain and sphere of influence.</i></p>	In progress	<p>We have a clear plan in place to manage the risk of forced and child labour across the value chain. This includes appropriate due diligence for suppliers, training and regular audits and inspections of work sites. We have provided human rights training to employees and contractors, with a focus on child labour and forced labour risks. In 2024, we trained 312 employees and contractors.</p>

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Theme 3: Land access and use	14. <i>Continue to mitigate ongoing impacts of land acquisition and use on vulnerable groups such as women and children through progressive monitoring, as per the Resettlement Action Plans.</i>	Implemented – monitoring	<p>We acknowledge the impact that land acquisition has had on communities, and we have been working in accordance with IFC Performance Standard 5 to respect the rights of people affected by the project (PAPs). We continue to implement our <i>Plan d'actions de réinstallation et de compensation</i> (“PARCs” or “Resettlement Action Plans” in English) and Livelihood Restoration Plans (“LRPs”). As per these plans, in addition to compensation for the acquisition of land, PAPs are entitled to additional support, including cash incentives, to find replacement land and continue their livelihood activities. This support is intended to mitigate the risk of PAPs not finding replacement land, thereby jeopardizing the restoration of their livelihood streams.</p> <p>Recent activities include:</p> <ul style="list-style-type: none"> • Development of a joint LRP with WCS for the offshore marine activities at the Port, with implementation in progress. The implementation of the other site-specific LRPs is due to commence during quarter one of 2025. These plans focus on agricultural intensification and income-generating activities. Agricultural intensification support programs will encourage PAPs to use their cash compensation to purchase replacement land. • Establishing and launching a monitoring and evaluation mechanism for PARC activities including additional resourcing to support with monitoring and evaluation of land acquisition and livelihood restoration activities.
	15. <i>Continue to promote the benefits of using cash compensation to purchase replacement land to the recipients of land acquisition payments.</i>	Implemented – monitoring	<p>Through consultation with PAPs during the development of the PARCs it was noted that the preference of those people being affected by the Project was to receive cash compensation so they could have agency over their livelihoods. We recognise paying cash compensation can have significant risks for people. In addition to the agricultural intensification support programs described above, we have put in place various mitigate measures to address risks of cash compensation including:</p> <ul style="list-style-type: none"> • Mandatory financial literacy training was provided to PAPs prior to their compensation payments. • To promote the purchase of land, we engage with PAPs, community leaders, and influential people to educate new PAPs about the risks of misusing cash compensation. • An agreement is being established with a Guinean CSO to provide independent support to PAPs through the land acquisition and livelihood restoration process; this CSO will also serve as an independent monitor on the potential impacts of

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			these processes.
	16. <i>Raise awareness about efforts to preserve cultural heritage, in alignment with the cultural heritage management plan.</i>	Implemented – monitoring	We continue to implement our Cultural Heritage Management Plan (CHMP) which includes consultation and awareness activities with community members, employees and contractors on the importance of protecting cultural heritage sites. As part of the CHMP, communities play an important role in the preservation of identified cultural heritage sites and close consultation and engagement with village authorities is required for all impacted sites. In addition, regular training is provided to employees and contractors on the chance find procedure and cultural heritage awareness more broadly.
Theme 4 – Community health, safety and wellbeing	17. <i>In line with the ESIA's, address ongoing risks and impacts related to community health, safety and wellbeing.</i>	In progress	<p>We continue to prioritise the health, safety and wellbeing of communities, to prevent risks and impacts including on water, impacts of noise, dust and heavy traffic. We are managing ongoing risks through the implementation of the Community Health & Safety Management Plan and the Project-Induced Migration Management Plan. Recently these efforts have included building and equipping health centres and the construction of water points and boreholes for affected communities as part of our community development initiatives. Community health awareness and prevention campaigns include a focus on malaria, HIV/AIDS, and chronic diseases.</p> <p>Road safety campaigns are regularly held in communities to address the risks of traffic and a network of community agents has been built across impacted communities to support with traffic management and awareness.</p>
	18. <i>Expand community access to clean and safe water.</i>	In progress	<p>Water is a shared resource that is critical to sustaining biodiversity, social and economic prosperity. We share water with the communities and nature surrounding our operations, so we aim to avoid permanent impacts on water resources by carefully managing the quality and quantity of the water we use and return to the environment.</p> <p>We are also working to provide additional community water sources and we closely monitor impacts and introduce mitigations if needed. For example, we have constructed over 40 boreholes and industrial water points in the past two years, along with a system to mitigate river pollution and in-migration causing pressure on water points. We continue to monitor water quality and levels and introduce mitigation actions as needed.</p>
	19. <i>Address ongoing concerns regarding in-migration, with a special focus on the</i>	In progress	We have established over 50 community-based Project Induced Migration committees to support the integration of new arrivals, identify and address impacts of in-migration, and to help maintain social stability.

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	disproportionate impacts experienced by vulnerable groups.		
	20. <i>Investigate and address concerns about local content, as part of this take additional steps to prioritize positions for long term community residents.</i>	Implemented – monitoring	<p>Concerns related to local content can be raised through our community grievance mechanism and employee mechanisms such as myVoice. Concerns are investigated by internal teams depending on the nature of the issue (e.g. CSP, Human Resources, Ethics & Integrity, or the Rio Tinto Business Conduct Office).</p> <p>We continue to strengthen engagement with communities on all aspects of the Project. This includes maintaining an open line of communication with communities and engaging through specific working groups to address any potential concerns about recruitment practices. We provide training programs to enhance the skills of local candidates. We continue to prioritise the hiring of personnel from local communities by SimFer and this is enforced through monitoring by SimFer and collaboration with contractor recruitment teams.</p>
	21. <i>Assess the long-term impacts of noise, dust, and heavy vehicle traffic on local communities.</i>	In progress	We are committed to the health, safety, and wellbeing of the communities in which we operate. We conduct continuous monitoring of noise and dust levels in communities, particularly on public roads. This includes regular inspections and the use of advanced monitoring tools which can provide detailed information to track changes over time. Monitoring information will inform adaptive management strategies to address long-term impacts.
	22. <i>Address ongoing project-induced migration (PIM) related health and safety risks and impacts for vulnerable groups (e.g. women and children).</i>	In progress	Project Induced Migration (PIM) is a key risk for projects of this scale and we are committed to addressing the impacts in line with international best practice. We monitor key PIM indicators including health impacts specific to vulnerable groups and inflation statistics in key hotspots which allows for adaptive impact management strategies. A PIM plan has been established which includes measures specific to vulnerable groups. A technical committee oversees and monitors its' implementation.
	23. <i>Formally integrate human rights considerations into the broader Health, Safety, Environment, and Communities (HSEC) management plan expectation for suppliers.</i>	Implemented – monitoring	We recognise the opportunity to further integrate human rights into existing Health, Safety, Environment, and Community (HSEC) management plans with suppliers, rather than having standalone human rights management plans. Our contracts articulate our human rights expectations to all third parties and require contractors to implement management plans which are monitored as part of our contractor management process. In 2025, we will continue to support integration of human rights into HSEC management plans and monitor the implementation of these plans by suppliers and contractors.

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Theme 5 – Grievance mechanisms	24. <i>Assess the efficacy of Community Grievance Mechanisms and supplier-oriented mechanisms, including by consulting with users.</i>	In progress	The provision of effective grievance mechanisms is central to our human rights approach. We seek to ensure communities have access to appropriate grievance mechanisms and continue to strengthen the tools and systems to support this. We are taking the steps to implement these recommendations and regularly review the effectiveness of our grievance mechanisms, which includes evaluating the effectiveness of the community complaints mechanism against the UN Guiding Principles on Business and Human Rights (UNGPs) effectiveness criteria. In 2025, we will meet with communities and gather feedback to help improve the mechanism.
	25. <i>Increase the current educational theatre trainings focused on key themes of the Everyday Respect Report initiative and opportunities to report grievances.</i>	Implemented – monitoring	<p>We have implemented an awareness program at the Franco-Guinean Cultural Center, featuring a theatrical presentation on the workplace challenges highlighted in the Everyday Respect report, which covers inclusion, diversity, and harassment. The next phases of these theatrical presentations will take place at the port and the mine.</p> <p>We also developed SimFer human rights awareness training which includes promotion of the grievance mechanisms (available in English and French with Mandarin under development). This training is available to SimFer employees, contractors and subcontractors.</p>
	26. <i>Support suppliers in establishing their own grievance mechanisms.</i>	Not started	All SimFer contractors and suppliers are required to have their own grievance mechanism. However, we acknowledge that many of our contractors and suppliers do not have the capacity or capability to establish an effective grievance mechanism on their own. We are developing a plan to identify ways to work with and support contractors and suppliers to set up and promote grievance mechanisms for their workers.
	27. <i>Promote the reporting of grievances among employees, supply chain workers, and community members.</i>	Implemented – monitoring	<p>The grievance mechanisms (both community and employee mechanisms) are introduced in employee and contractor induction materials at the start of employment and contract onboarding. Further promotion of employee mechanisms such as myVoice is achieved through displayed materials, emails, Everyday Respect activities and ongoing training.</p> <p>We provided training to the SimFer Industrial Relations team and Communities and Social Performance team on the UNGPs effectiveness criteria and offer tools and engagement protocols to support the effectiveness of grievance mechanisms, including discussions with workers and communities.</p>