



HUMAN RIGHTS PROGRESS REPORT

August 2026

TABLE OF CONTENTS

Our Approach to Human Rights – Chris Aitchison, Managing Director, SimFer.....	3
CONTEXT	4
SimFer’s commitment to human rights	4
Human rights governance and due diligence at SimFer	4
Limits, interdependencies and stakeholder engagement.....	5
Ongoing focus areas – 2026 and beyond.....	5
KEY INDICATORS	5
PROGRESS BY SALIENT HUMAN RIGHTS THEMES.....	6
Theme 1 – Labour rights (employees).....	6
Theme 2 – Labour rights (contractors and suppliers)	6
Theme 3 – Land access and use.....	7
Theme 4 – Community health, safety and well-being.....	7
Theme 5 – Grievance mechanisms.....	7
CASE STUDIES (EXAMPLES)	8
Case study 1 – SIMFER’s commitment to transparency	8
Case study 2 – Improving access to grievance mechanisms	8
LOOKING AHEAD – PRIORITIES FOR NEXT 12 MONTHS.....	9
ACKNOWLEDGEMENTS	9
Progress update on HRIA recommendations, March 2025 – June 2026	10
Appendix – Acronyms and Abbreviations.....	19

Our Approach to Human Rights – Chris Aitchison, Managing Director, SimFer

Respecting human rights and identifying human rights risks and impacts is fundamental to the way we are developing and operating SimFer. This is driven by an integrated approach built into the way we make decisions, manage risk, engage with people and build trust throughout the life of the project.

In 2024 – for the first time in Rio Tinto – we conducted an independent assessment of our human rights impact and performance, with an independent specialist consultancy reviewing and benchmarking our performance and identifying both salient human rights themes for SimFer and specific recommendations for us to focus on.

We published a summary of this Human Rights Impact Assessment (HRIA) in 2025, alongside a progress report detailing our approach to addressing and embedding the recommendations in our systems and processes. We are committed to providing ongoing updates on our processes and through this document are pleased to report on our progress.

Through our work in 2025 to address and close out these recommendations, we have learned more, tested and verified approaches and continued to embed a rights-holder centric approach into everything that we do. We are pleased to have integrated new ways of working into our everyday approaches as well as identifying areas which will require ongoing focus and care in the years ahead, and in some case, across the life of the mine.

We are proud that this approach is setting a new benchmark for our industry in transparency and partnership and we are committed to continuing to strengthen and embed this in the months and years ahead. Of particular importance is our partnership with communities and civil society representatives, with whom we have a continued and focused dialogue on the issues identified.

We also recognise that in a project of this type, our contractors and other partners play a key role. It is a source of great pride to have seen progress in this area, for example through contractor partners adopting Rio Tinto's approach to whistle blower mechanisms and strengthening community engagement.

Simandou has the potential to transform Guinea and the communities closest to the project. But we also recognise the care required to deliver and ramp up in a way which manages the inevitable impacts. As we move toward operational ramp up, continued focus will be required particularly to manage the demobilisation of our construction workforce and continue to embed long-term measures to restore livelihoods, create a stronger economic future for communities and strengthen our approach to ensuring a rights-based focus across our supply chain.

We look forward to accelerating our progress in the year ahead, in partnership with suppliers, contractors, communities and individual rights-holders.

Chris Aitchison

Managing Director, SimFer

CONTEXT

In March 2025, SimFer (hereinafter “SimFer”, “we”, “our”) published the public summary report of its independent Human Rights Impact Assessment (hereinafter “HRIA”), available at the following address: <https://simfer-sa.com/en/disclosures/> (hereinafter the “Public Summary Report”). This report was prepared by Article One, a consulting firm specializing in human rights and ethics, which was commissioned to conduct two HRIAs:

- One covering blocks 3 and 4 of the Simandou mine (the “SimFer mine”);
- The other covering the infrastructure related to the mine (namely the SimFer rail spur and port, hereinafter the “Infrastructure”).

Article One’s 2025 Public Summary Report identified five salient human rights themes, together with six general recommendations and 21 specific recommendations grouped by theme, which SimFer has committed to implementing and regularly reporting on its progress. The five salient human rights themes were as follows:

- Labour rights (employees)
- Labour rights (contractors and supply chain workers)
- Land access and use
- Community health, safety and well-being
- Grievance mechanisms

This document constitutes the second progress update, hereinafter the “Progress Report”, highlighting updates since March 2025. It reflects our commitment to transparency and accountability toward SimFer’s stakeholders and affected rights-holders, while acknowledging that many measures require progressive implementation over several years, decades, or even across the life of the mine. You can find detailed updates and developments since March 2025 towards the end of this document.

SimFer’s commitment to human rights

Our commitment to human rights is central to our values and corporate governance. It means treating everyone affected by our operations and business relationships with dignity and respect: our employees, contractors and suppliers, workers in our value chain, the communities where we operate, and anyone else who could potentially be impacted. The publication in 2025 of the HRIA Public Summary Report was a first for the Simandou project and for Rio Tinto, and demonstrates our commitment to transparency and respecting human rights, understanding our human rights risks, and, where any impacts do occur, providing remedy and embedding learnings.

We recognise that our activities can both contribute positively to the realization of human rights and generate risks of adverse impacts. The HRIA enabled us to refine our understanding of these risks and impacts, to strengthen our due diligence processes, and to prioritize actions where risks are most significant.

Human rights governance and due diligence at SimFer

Recognizing that a project of this scale, developed within a complex partnership environment and on a tight schedule, can increase human rights threats and opportunities, we have incorporated the findings of the HRIA into our ongoing due diligence processes, seeking to align with the United

Nations Guiding Principles on Business and Human Rights (UNGPs). This ongoing process is centered on: (i) the company's commitment to human rights (based on Rio Tinto's Human Rights Policy and related requirements); (ii) the identification and assessment of risks, impacts and challenges; (iii) the integration of findings and the implementation of prevention/mitigation measures with monitoring; and (iv) communication regarding the management of risks, impacts and challenges.

SimFer's Human Rights Management Plan and its annual action plan incorporate the recommendations from the HRIA and are implemented by an internal multidisciplinary and cross-functional coordination committee. This committee is mandated to support consistent implementation of management and mitigation measures, prioritization of risks based on the UNGP's saliency approach (the most severe risks to rightsholders), and to coordinate monitoring and follow-up on corrective actions.

Limits, interdependencies and stakeholder engagement

We are aware that some of the issues identified are complex, systemic and persistent, and that our ability to prevent or mitigate certain impacts depends on the actions taken by others. To drive change, we are committed to collaborating with civil society organizations (CSOs), public authorities, local communities, our industrial and commercial partners, our suppliers and contractors, as well as other stakeholders to address these shared challenges.

Ongoing focus areas – 2026 and beyond

SimFer continues to strengthen the integration of the recommendations from the 2024 Human Rights Impact Assessment into its governance and due diligence systems, through ongoing monitoring of environmental and social management plans, intensifying training and awareness-raising, and improving access to grievance mechanisms. However, key risks remain related to the workforce demobilization phase (socio-economic impacts and increased risks for vulnerable groups), the sustainable restoration of livelihoods, and human rights performance in the supply chain. For the next 12 months, our priorities are to implement the workforce demobilization action plan, accelerate and measure the effectiveness of the Resettlement & Compensation Action Plan (RCAP) and Livelihood Restoration Programme (LRP), and strengthen supplier performance (e.g., via audits, focus on living wages, and improving worker access to grievance mechanisms) to help reduce risks and increase the project's positive impact.

KEY INDICATORS

The table below summarizes some of the results from the implementation of actions based on the HRIA recommendations, as well as from our engagement plan for stakeholders and rights holders.

Indicators	Value / Period
People reached by our general and targeted awareness raising, training and communication initiatives focused on human rights	≥ 1,880 (March 2025–March 2026)
VPSHR training – Defence and Security Forces	585 people (2025)
VPSHR training – Private security	3,853 security personnel (2025)
Awareness-raising about child labour & forced labour risks	765 people (2025)

Project-induced migration (PIM) community committees	62 committees established
Spending with local companies	> \$300 million (March 2025–March 2026)
Local companies that have worked with SimFer	400, of which at least 131 local businesses remained under contract between January and June 2026
Local jobs	> 556 national staff (including 323 local staff ¹) for SimFer; 3,272 national staff and approximately 11,248 local staff among subcontractors (April 2026)
Communities trained on the management of project-related grievances	> 400 people (2025)
Employees and contractor employees trained on myVoice ²	≥ 700 people (January 2025 – June 2026)

PROGRESS BY SALIENT HUMAN RIGHTS THEMES

This section outlines the key actions taken to implement the recommendations from the HRIA and based on the five identified salient human rights themes identified.

Theme 1 – Labour rights (employees)

- **Key actions:** (i) Strengthened HSSEC procedures, training in incident management (144 employees), and training on the implementation of Enablon³ (at least 200 professionals trained); (ii) Improved language inclusion measures such as creating multilingual materials in French, English, and Mandarin and local languages (mainly Malinké, Koniaké, Soussou), and formats adapted for low-literacy audiences such as videos and simulators); (iii) adoption of a gender, diversity and inclusion strategy, with awareness-raising activities and training reaching at least 500 direct project employees.
- **Expected impact:** Improvement in the prevention of critical risks and in understanding of project requirements, with a reduction in communication barriers and risks related to gender, inclusion and diversity.
- **Areas for improvement:** Continued focus on ensuring compliance with EveryDay Respect recommendation related to camps (particularly for women) and monitoring the effectiveness of fatigue management, transport and occupational health and safety measures.

Theme 2 – Labour rights (contractors and suppliers)

- **Key actions:** (i) Launched an audit covering a representative sample of subcontractors and suppliers working on the mining component of the project; (ii) preparations undertaken to align wages across the project's national supply chain with the 2025 CCMC (collective agreement for mines and quarries); (iii) continuing due diligence measures regarding decent

¹ Local staff are defined as those who come from the villages within the Project's area of influence.

² myVoice is Rio Tinto's global whistleblower and confidential reporting programme, managed at the Rio Tinto Group level. Anyone who suspects or witnesses potential misconduct - such as wrongdoing, harmful or improper behaviours or practices - related or connected to Rio Tinto's business, can make a confidential report via myVoice; this includes current and former employees, shareholders, contractors and their subcontractors, external consultants, suppliers, customers, service providers, partners, members of the public or the communities where we operate, and, also their partners, dependants or dependants of the spouse and relatives.

³ Enablon is Rio Tinto's incident reporting and management tool for Health, Safety, Environment and Communities incidents.

working conditions and the prevention of child labour and forced labour; and (iv) trained at least 253 managers in the project supply chain on human rights risks management.

- **Expected impact:** Identification and closing of gaps in labour rights compliance among contractors and suppliers, strengthened contractual compliance, and expected improvement in the protection of workers' health, safety and well-being throughout the project's supply chain.
- **Areas for improvement:** Finalize, validate and implement a human rights risk assessment framework for suppliers and contractors; strengthen the effectiveness of contractors' grievance mechanisms (access, confidentiality, timeliness, effectiveness, and monitoring of corrective actions, etc.).

Theme 3 – Land access and use

- **Key actions:** (i) Implemented a structured system for identifying and supporting vulnerable households; (ii) promotion of in-kind compensation solutions (replacement land) in line with IFC Performance Standard 5; and (iii) launch of the Livelihood Restoration Programme (LRP).
- **Expected impact:** Reduced risk of impoverishment for Project Affected Persons (PAPs) and stronger protection of vulnerable groups through individualised plans (e.g., related to food security and access to schooling and housing).
- **Areas for improvement:** Strengthen the measurement of LRP effectiveness (income, food security, access to land) and document medium-term results to better demonstrate impacts on livelihoods.

Theme 4 – Community health, safety and well-being

- **Key actions:** (i) Launched a health risk prevention campaigns targeting malaria, HIV/AIDS, breast cancer and road/rail safety; (ii) strengthened environmental monitoring (noise, dust, water) through continuous measurement systems; and (iii) Supported Project Induced Migration (PIM) management by establishing 62 community committees to address migration related issues , identify and register in-migrants, and contribute to conflict prevention).
- **Expected impact:** Strengthened prevention and management of community health and safety risks related to traffic, environmental impacts (noise, dust, water) and project-induced migration.
- **Areas for improvement:** Accelerate community access to drinking water (boreholes/water supply systems), strengthen the analysis of long-term impacts (noise, dust, road traffic, water) on vulnerable people with targeted corrective actions, and strengthen community awareness of the project's environmental management and monitoring systems.

Theme 5 – Grievance mechanisms

- **Key actions:** (i) Development of a consistent framework for the project's grievance mechanisms; (ii) awareness-raising and training on grievance mechanisms for 400 community members and 700 workers (SimFer and contractors), (iii) implemented a multilingual hotline for the internal myVoice mechanism.
- **Expected impact:** Improved awareness, more accessible and legitimate mechanisms, and greater consistency in grievance management.

- **Areas for improvement:** Consult and embed user feedback to help further improve effectiveness of the community grievance mechanism (UNGP criteria); integrate and communicate improvements based on user feedback (e.g., related to timelines, satisfaction, resolution rates); and, use the example of the confidential "Kouma" mechanism developed by GPC (a mine contractor) to encourage other contractors to improve the effectiveness of their grievance mechanisms for their employees.

CASE STUDIES (EXAMPLES)

Case study 1 – SIMFER's commitment to transparency

SimFer's engagement with civil society organisations

Since the launch of the project, SimFer has made dialogue with its stakeholders a central pillar of its commitment to social responsibility and respect for human rights. Central to this is a commitment to deep engagement with a broad range of civil society organisations on topics of importance to communities. Through this dialogue, these organisations play an active role in ensuring transparency and helping SimFer to monitor and improve its practices and strengthen accountability.

To bring structure to this dialogue, SimFer has established regular, formalised engagement frameworks, formally consulted on key topics and held site visits and engagement with SimFer and Rio Tinto leaders in Guinea and internationally. Between January 2024 and February 2026, SimFer has held Civil Society roundtables with a range of organisations. As well as enabling dialogue on the project's progress and its impacts, these sessions have allowed deeper discussion on a number of topics including environmental impacts, working conditions and community impacts. In June 2025, a roundtable discussion on Human Rights was held to discuss risks, impacts and mitigations, including those identified through the Human Rights Impact Assessment.

Guinean Civil Society Organisations have also been represented internationally, at Rio Tinto's global Civil Society roundtables which have been taking place for more than six years.

The NGO Action Mines Guinée, which monitors the impact of Simandou on local communities through local monitoring committees in Beyla and Kerouane, close to the SimFer mine have remained engaged throughout this process. In January 2026, Action Mines Guinée conducted a field mission to the SimFer mine and surrounding communities to inspect progress on a number of community grievances and SimFer's response plans.

Through dialogue and approaches of this type, SimFer deepens its understanding of the project's social and environmental challenges and identifies practical areas for improvement – with independent monitoring and inputs integrated directly into operational activities, strengthening the project's credibility and enhancing its positive impact on communities and stakeholders.

Case study 2 – Improving access to grievance mechanisms

Promoting anonymous and confidential grievance mechanisms

As part of the implementation of the HRIA's recommendations, SimFer identified the need to work more closely with its contractor partners, in particular to strengthen their practices related to

grievance management, employee protection and the promotion of safe and respectful working environments.

Among the key priorities identified, SimFer has encouraged its partners to establish reliable reporting mechanisms capable of ensuring confidentiality, accessibility and the effective handling of any concerns raised, in line with global human rights standards.

GPC is a leading Guinean business, engaged on multiple operational and construction activities, employing more than 1,600 people on the Simandou project. GPC worked with SimFer to strengthen its confidential employee reporting systems. In January 2026, GPC launched “Kouma”, an internal mechanism inspired by Rio Tinto SimFer’s “MyVoice” whistleblower system. Kouma allows GPC employees and contractors to report confidentially, any concerns or behaviours that do not comply with the company’s ethical and business standards. Kouma has created a genuine shift in GPC’s internal practices, helping build trust, encourage employees to speak up and leading to improvements in the handling of concerns.

Through its proactive approach, supported by SimFer, GPC has demonstrated its ability to take ownership of HRIA recommendations and translate them into actions tailored to its working environment. This initiative serves as an example for all partners and reflects SimFer’s commitment to promoting continuous improvement across its value chain as it strengthens its Human Rights management.

LOOKING AHEAD – PRIORITIES FOR NEXT 12 MONTHS

Workforce demobilization: Work closely with contractors to implement the action plan developed from the assessment of social impacts of demobilization, including a monitoring system (social indicators, vulnerable groups, early-warning mechanisms) and a communication plan for communities.

Livelihood restoration: Accelerate implementation of the LRP, strengthen support for vulnerable households, and consolidate the progress already achieved (e.g., related to income, food security, access to replacement land).

Supply chain management: Finalize and implement the human rights risk assessment framework for contractors and suppliers, validate the survey on living conditions in the mine camps and implement the corrective action plan, complete the audit on contractors and implement corrective measures as needed, and support contractors to strengthen the effectiveness of their grievance mechanisms (e.g., related to confidentiality, accessibility, transparency).

ACKNOWLEDGEMENTS

By detailing how we have sought to implement Article One’s recommendations from the HRIA, as well as the areas where we still need to take further action, we aim to demonstrate our accountability and commitment to manage adverse impacts on human rights. We are deeply grateful to the many community members, employees, contractors, suppliers, CSOs and other stakeholders who took the time to participate in the HRIA and in supporting us with follow-up actions. We believe that the process and results of the HRIA will help SimFer continue to improve and strengthen our approach to human rights due diligence and respecting human rights more generally.

Progress update on HRIA recommendations, March 2025 – June 2026

The following table shares our progress against Article One’s general and specific recommendations from the HRIA. Implementation plans are complete for all actions with tangible changes implemented across systems, processes and monitoring mechanisms.

In many cases, while implementing the recommendations, we have identified further areas of focus and approaches to strengthen management of risk, as well as to embed practices across the life of mine.

In reviewing progress, we have highlighted those recommendations which require continued focus, either in the short term or across the life of mine, as well as those recommendations which are now embedded in practice through our systems and “Business as Usual” approaches.

Embedded in practice	Recommendations have been implemented with measures fully embedded into the project’s operational systems and practices.
Continued focus	While implementing the recommendations, further areas of focus and additional actions have been identified for implementation in 2026 and 2027 – and in some cases over the Life of Mine. Monitoring of further progress remains underway.

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
General recommendations	1. <i>Fully implement the recommendations from the Environmental Impact Assessment and Social Assessment (ESIAs), Environmental and Social Management Plan (ESMP), and the mitigations in the SimFer Human Rights Management Plan.</i>	Embedded in Practice	- Conducted four internal audits to assess progress and effectiveness of the implementation of the Environmental and Social Management Plans (ESMPs). - Received the annual Certificate of Environmental Compliance (CEC) following a successful audit by the Guinean Environmental Assessment Agency (AGEE). - Implementation of a harmonized monitoring framework for the ESMPs throughout the project lifecycle.
	2. <i>Continue to engage proactively and regularly with rightsholders, including</i>	Embedded in practice	Held four roundtable meetings with 15 Guinean civil society organizations (CSOs). The themes of the round tables included

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
	<i>employees, supply chain workers, and Project Affected Persons (PAPs).</i>		demobilization (March 2025), human rights (June 2025) and local content (September 2025), Project Induced Migration (March 2026). • Held three meetings with the non-governmental organization Action Mines Guinée on impact monitoring for the Simandou Project. • Trained 1,475 people, including SimFer employees, contractor workers, CSO representatives and members of local communities. • Placed 20 Community Liaison Officers and five Security Liaison Officers within communities affected by the mine, the rail spur, and the port. • Implementation of ongoing community awareness campaigns on a range of topics related to the project's impacts (road and rail safety, compensation and livelihood restoration, malaria, HIV/AIDS, grievance mechanisms, etc.).
	3. <i>Continue to address security risks and impacts, including their root causes, for employees, supply chain workers and local communities.</i>	Embedded in practice	• Trained 585 members of the Defence and Security Forces (FDS) and 3,853 private security guards on the Voluntary Principles on Security and Human Rights (VPSHR). • Signed a Memorandum of Understanding with the Republic of Guinea on security arrangements in the project areas in alignment with VPSHR principles (June 2025).
	4. <i>Increase engagement with WCS on human rights and support and encourage them to continue to address key environmental and human rights issues.</i>	Embedded in practice	• Established monthly SimFer–WCS meetings at the port focused on community and stakeholder engagement topics. • Ongoing collaboration with WCS for land-based and marine livelihood restoration activities. • Initiated weekly alignment meetings between la Compagnie du Transguinéen (CTG) and SimFer on operational issues that have implications for communities.
	5. <i>Continue to expand the framework for the provision of remedy for the SimFer Project, aligned with the UNGPs.</i>	Embedded in practice	• Continued to track actions from 2024 HRIA via multifunctional internal Human Rights Committee.

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
			Conducted ongoing community awareness-raising about the community grievance mechanism, project-induced migration, road safety, malaria, HIV/AIDs, etc.
	6. <i>Mitigate risks associated with the construction demobilization phase of the Project, with a special focus on addressing impacts to vulnerable groups such as women, children, and the elderly.</i>	Continued focus	- Engaged more than 13,000 people in 74 locations for the Demobilisation Social Impact study (Q3 2025); identified impacts included social tensions, pressure on natural resource pressures, income loss and food insecurity; vulnerable groups identified included women, youth and children. - Established targeted interventions to manage identified impacts such as specialized training for women and initiatives for livelihood and enterprise development.
Theme 1: Rights at Work - 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>	Embedded in practice	- Trained 144 SimFer and contractor employees in incident management and nearly 200 employees in HSSEC incident reporting, strengthening accountability and improving action management across operational teams. This resulted in a reduction in overdue action closures from 58% to 15% by June 2026. - Established daily prevention routines through Visual Management Boards and toolbox meetings. - Implemented ongoing occupational health assessments for noise exposure, dust, crystalline silica, heat stress, welding fumes and diesel particles, based on individual assessments (H1/H2 noise, H3 vibration). - Established fitness-for-work programme to address fatigue risks and alcohol and drug use; the programme includes analysis of working hours, rosters and fatigue factors (e.g. travel, accommodation conditions, sleep quality).
	8. <i>Address language challenges related to staff management.</i>	Embedded in practice	- Designed and delivered all training materials in French, English and Chinese/Mandarin, along with Malinké, Koniaké and Soussou when needed. - Adapted training for people with lower literacy levels (e.g. limiting the use of text and favouring practical formats; providing

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
			inductions/assessments without text; using animated training videos; relying on experience-based and problem-solving learning.) • Employed translators to reduce communication gaps (e.g. for in-field management, training workshops).
	9. <i>Provide sufficient resources to expand existing efforts to promote gender diversity.</i>	Embedded in practice	• Implemented the Diversity & Inclusion Strategy, leading to more inclusive recruitment and workplace practices. Mixed-gender recruitment panels have contributed to increased female representation, while dedicated lactation rooms, adapted PPE for pregnant employees, and access to a female doctor have improved support for women in the workplace. • After conducting a gender-sensitive assessment of facilities, a breast-feeding facility was established in the Conakry office, and a dedicated camp committee was created to improve the living conditions for women in the camp and to support implementation of gender initiatives. • Raised awareness of 542 people (employees, contractors and communities) on gender issues through training, information-sharing and community engagement activities.
Theme 2: Labour rights – subcontractors and suppliers	10. <i>Conduct an audit to address ongoing issues of contractor and supplier non-compliance with Project Standards and contractual human rights obligations.</i>	Embedded in practice	• Conducted audits of high-risk contractors to assess gaps between contractual commitments and workplace practices; monitoring implementation of corrective actions.
	11. <i>Address ongoing concerns related to supplier wage rates. In doing so, work to ensure all supply chain workers receive a living wage.</i>	Embedded in practice	• Required all contractors to conduct a salary review to ensure alignment with the new Collective Agreement for Mines, Quarries, Mining and Similar Industries (CCMC/2025) as of the second quarter of 2026.
	12. <i>Develop a programme to support suppliers in conducting labour rights risk assessments of their operations.</i>	Continued focus	• Conducted an audit of contractors to identify workers' rights risks with a focus on supporting decent working conditions.

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
	<i>13. Investigate and address risks of child and forced labour in SimFer's extended supply chain and sphere of influence.</i>	Continued focus	- Trained 765 people, including SimFer employees and contractors, on child labour and forced labour. - Undertook annual internal reviews that SimFer's commitments on the prevention of child labour and forced labour are being respected.
Theme 3: Access and Land Use	<i>14. Continue to mitigate the ongoing impacts of land acquisition and use on vulnerable groups such as women and children through progressive monitoring and expedited Livelihood Restoration Programmes, as per the Resettlement Action Plans.</i>	Embedded in practice	- Implemented the Compensation and Resettlement Action Plan in compliance with IFC PS5, including identification of vulnerable people, particularly women and children. - Conducted socio-economic baseline studies to identify pre-existing and project-induced vulnerabilities; results informed the design and implementation of livelihood restoration plans. - Established a social monitoring system to measure the effectiveness of mitigation measures and adjust actions as necessary, including via regular reviews and field visits, with particular attention paid to the situation of women, children and other vulnerable groups.
	<i>15. Continue to promote the benefits of using cash compensation to purchase replacement land to PARC recipients.</i>	Embedded in practice	- Promoted, where possible, in-kind compensation for those affected by the loss of agricultural land, in line with the requirements of IFC Performance Standard 5. - The in-kind compensation strategy favours the replacement of agricultural land with plots of equal or greater value, supported by technical and administrative support for the identification, negotiation and securing of land tenure for replacement land. - Households with high dependency on agriculture are prioritized for in-kind compensation to limit the risks of impoverishment linked to exclusively monetary compensation. - Promotion of in-kind compensation is integrated systematically into the Livelihood Restoration Plan (LRP). Affected people are supported by complementary actions (agricultural support, inputs, training, collective and community projects). - For households that choose monetary compensation, the Project conducts financial literacy training and promotes sustainable livelihood activities to reduce risks of impoverishment.

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
	<i>16. Raise awareness about efforts to preserve cultural heritage, in alignment with the Cultural Heritage Management Plan.</i>	Embedded in practice.	- Trained 150 contractors on cultural heritage. Contractor teams incorporate cultural heritage protection into planning and execution of work, showing awareness and taking responsibility to prevent impacts on culturally significant areas. - Engaged more than 400 people from the eight villages around the mine on the preservation and protection of cultural heritage and archaeology. Similar training is expected to be conducted for communities along the railway and at the port. - Collaboration with national institutions for the conservation and promotion of cultural heritage (e.g. celebrating tangible and intangible local cultural heritage during the 2025 Festival in Beyla).
Theme 4 - Health, Safety and Community Well-Being	<i>17. In line with the ESIAs, address ongoing risks and impacts related to community health, safety, and wellbeing.</i>	Embedded in practice	- Organized several engagements with key stakeholders on project status, activities and impacts. - Implemented awareness-raising campaigns in communities on road safety (7 campaigns for the port and railway); rail safety (71 campaigns at the port, railway and mine); livelihood restoration (76 campaigns at the port, railway and mine); workforce demobilization (7 campaigns along the railway); malaria prevention (8 campaigns at the port and railway); HIV/AIDS prevention (13 campaigns at the mine); breast cancer awareness (1 campaign along the railway for nearly 200 women). - Conducted ongoing community engagement on the risks of rail accidents, including via hotspot identification and signage improvement. - Continued programme of indoor spraying for malaria prevention in 12 villages near the rail spur and port.
	<i>18. Expand communities' access to clean and safe drinking water.</i>	Embedded in practice	- Since 2023, SimFer has established more than 31 boreholes with public access as well as 38 boreholes linked to social infrastructure projects (schools, dispensaries, training/community centres). - Constructing additional boreholes and water access for 13 villages near the mine, 28 villages along the railway and 1 village near the port.

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
	19. Address ongoing concerns about in-migration.	Embedded in practice	- Establishment of 62 Project-Induced Migration community committees in 29 villages near the mine (Beyla), 25 along the railway spur (Kérouané), and 8 near the port (Forécariah). These committees facilitate the identification and registration of new arrivals, promote peaceful coexistence, and help prevent conflicts. - Continued to build social infrastructure (schools, water systems, dispensaries) in host communities to help relieve pressure of population growth due to in-migration. - Organization of social events throughout the year (e.g. football tournaments, village waste cleaning days) to help promote peaceful coexistence.
	20. Investigate and address concerns about local content, as part of this take additional steps to prioritize positions for long term community residents.	Embedded in practice	- Organized annual local content days to maximize the local supply chain and promote employment and business opportunities. - Local businesses demonstrate increased capability, competitiveness, and integration into project activities, reflected in growing engagement and procurement spend directed locally. Spent more than USD 300 million with more than 400 local businesses since March 2025. 131 local companies were under contract between January and April 2026. - With regard to employment in 2026, SimFer employs 556 national employees and 323 local employee⁴, while contractors and suppliers account for 3,272 national employees and 11,248 local employees.
	21. Assess the long-term impacts of noise, dust, and heavy vehicle traffic on local communities, with a special focus on the disproportionate impacts experienced by vulnerable groups.	Embedded in practice	- Ongoing and automated monitoring of dust and noise against permit and safety requirements, allowing real-time intervention and mitigation. - Noise monitoring system carries out hourly checks to calculate a daily average exposure and compare it to the applicable standards.

⁴ Here, “local employment” refers to workers from communities located near the project, while “national employment” refers to workers from other regions of the country.

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
	22. Address ongoing project-induced migration (PIM) related health and safety risks and impacts for vulnerable groups (e.g. women and children).	Embedded in practice	- Continued monthly health data collection to track key indicators related to Project-Induced Migration, including health impacts on vulnerable groups and inflation statistics in key hotspots, allowing for adjustment of impact management strategies. - Continued to provide alternative livelihood support to women previously engaged in artisanal and small-scale mining in the Pic de Fon forest.
	23. Formally integrate human rights considerations into the broader HSEC management plan expectation for suppliers.	Embedded in practice	- Integrated contractual provisions on modern slavery in SimFer contracts based on contractor risk assessments. - Additional oversight of high-risk contractors through Rio Tinto's group supplier due diligence process. - Training of contractors and suppliers on salient human rights issues.
Theme 5 - Grievance mechanisms	24. Assess the efficacy of Community Grievance Mechanisms and supplier-oriented mechanisms, including by consulting with users.	Embedded in practice	- Continued to conduct monthly and quarterly reviews of the grievance mechanism with the support of internal human rights experts. Examples of improvements have included strengthened data management in the Borealis system and improved resolution timelines. - Continued to conduct monthly meetings and field visits with CSO representatives to review the grievance management practices of the Communities and Social Performance (CSP) team.
	25. Increase the number of educational theatre trainings focused on the key themes of the Everyday Respect initiative and opportunities to report grievances.	Embedded in practice	Organized three "Everyday Respect" awareness sessions at the mine (focused on respectful workplaces) in the form of a theatrical performance, reaching nearly 500 people from the SimFer and contractor workforce.
	26. Support suppliers in establishing their own grievance mechanisms.	Embedded in practice	As part of the Simandou framework agreement (which covers the mine, the railway spur, and the port), SIMFER has established a grievance handling procedure applicable to the entire project supply chain. This procedure provides for: (i) internal handling at the level of each subcontractor, (ii) escalation to SimFer's Human Resources department through the Industrial Relations team, and (iii) referral to the General Labor Inspectorate (IGT).

THEME	RECOMMENDATIONS	STATUS	EXAMPLE ACTIONS (March 2025-2026)
			• SimFer teams, particularly those responsible for industrial relations and human rights, ensure that each subcontractor's own mechanisms are operating effectively on a regular basis.
	27 <i>Promote the reporting of all grievances among employees, supply chain workers, and community members.</i>	Embedded in practice.	• Trained more than 400 community members on the SimFer community grievance mechanism (e.g., how to access the mechanism, how to submit a concern, what they should expect in the process, etc.). • With regard to the reporting of grievances through the myVoice mechanism, the project has undertaken the following actions: ○ Conducted training, information and awareness campaigns on the myVoice programme for all sites (mine, railway, port and Conakry office), reaching nearly 700 SimFer employees and contractors. ○ Installed communications tools to promote the grievance mechanisms on all sites, including 50 posters in public areas such as canteens, sports fields, and bus stops. ○ Conducted awareness campaigns in the three main project languages (French, Mandarin and English) to support access to information. ○ Organized awareness sessions in local language during meetings to support inclusion and access to information for front-line workers. ○ Initiated the creation of a publicly accessible hotline for the myVoice programme, which is currently in the technical implementation and testing phase. ○ Development of the hotline as a simple and inclusive access point that targets people who are less literate or do not have regular access to Internet. ○ Development of multilingual functionality for the hotline so that it will be available in French, English, Mandarin, Malinké and Soussou.

Appendix – Acronyms and Abbreviations

ACRONYMS AND ABBREVIATIONS	DEFINITION
CCMC	Collective agreement for mines, quarries, the mining industry and related activities (2025 version)
CSO	Civil Society Organization
CSP	Communities and Social Performance Department
CTG	Trans-Guinean Company
HRDD	Human Rights Due Diligence
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
FDS	Defence and Security Forces
HRIA	Human Rights Impact Assessment
HRMP	Human Rights Management Plan
HSE	Health, Safety and Environment Department
HSSEC	Health, Safety, Security, Environment and Communities
LC	Local Content
LRP	Livelihood Restoration Programme
NGO	Non-Governmental Organization
PAP	Project-Affected Persons
PIM	Project-Induced Migration
PS/IFC	International Finance Corporation Performance Standard
RCAP	Resettlement and Compensation Action Plan
RT	Rio Tinto
UNGPs	United Nations Guiding Principles on Business and Human Rights
VPSHR	Voluntary Principles on Security and Human Rights
WCS	Winning Consortium Simandou