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HOW WE MANAGE HUMAN RIGHTS

This fact sheet is one of a series describing Capstone's management approach to material topics. For information on recent developments in our management approach and current performance, see our [2024 Sustainability Report](#).

This topic covers our responsibility to recognize and respect human rights and the rights of Indigenous People, and to mitigate impacts to these rights. It includes our approach to avoiding, mitigating and managing forced and child labour risks in our operations and supply chain. Additional details are found in our [2024 Modern Slavery Report](#). Potential human rights impacts on our workforce are also covered in [How We Manage People](#) and [How We Manage Health and Safety](#).

Impacts and Risks

Human rights are fundamental rights and freedoms inherent to all human beings. We identify potential impacts on human rights through international instruments, legislation, industry initiatives, risk assessments, community engagement, our Responsible Sourcing Program, our whistleblower channel, and site-level grievance mechanisms.

Mining companies have the potential to impact human rights both positively and negatively, directly and indirectly, throughout the duration of the mining lifecycle. We recognize the potential for our activities, decisions, and business relationships to affect the human rights of people in our workforce, communities near our operations, and workers in our value chain.

We have assessed the potential that we may cause or contribute to modern slavery, specifically forced or child labour, within our own operations as low. We have also determined the potential to affect other human rights as low, except for potential impacts relating to occupational health and safety of workers and contractors, which are inherent to mining operations. These were initially classified as medium risk, but are effectively mitigated through our health, safety, and environment (HSE) controls, resulting in a low residual risk classification.

We have not systematically documented all value chain impacts; however, we understand that we may unknowingly contribute to or be linked to human rights impacts through our relationships with contractors, suppliers, joint venture partners, and customers. We have begun to map the modern slavery risks in our Tier 1 suppliers. For details of our third-party supplier modern slavery risk assessment and results, see our 2024 Modern Slavery Report.

Indigenous Peoples' Rights

Indigenous Peoples' rights are the individual and collective rights of Indigenous populations, grounded in distinct social, cultural, economic, and political identities, and tied to traditional lands, languages, and heritage. We identify potential impacts to Indigenous Peoples' rights through international instruments, legislation, industry initiatives, risk assessments, community engagement, and site-level grievance mechanisms. We recognize our potential to affect rights of Indigenous Peoples through potential adverse impacts to land, traditional livelihoods, or cultural heritage. Pinto Valley, Mantoverde and Santo Domingo have identified Indigenous interests.

Failure to respect and manage impacts on human and Indigenous Peoples' rights can undermine socio-economic development. In regions where we operate, it can erode trust and contribute to social conflict, which can result in reputational damage, loss of social licence, operational disruptions, and financial penalties—all of which can have direct and indirect costs for the company.

Governance and Accountability

Capstone's human rights governance framework establishes clear roles, responsibilities, accountability, and oversight for decisions pertaining to human rights both at the corporate level and at each individual site.

Board oversight. The Board of Directors delegates oversight of human rights risks to two Board committees. The Governance, Nominating and Sustainability (GNS) Committee oversees Code of Conduct (COC) compliance including Human Rights Policy breaches. The Technical and Operational Performance (TOP) Committee oversees site-level human-rights risks specific to communities.

Executive accountability and support. The Senior Vice President, Risk, ESG and General Counsel (General Counsel) and the Chief Operating Officer (COO) are the senior executives accountable for human rights matters. Respectively, they report quarterly to the GNS and TOP Committees on performance as needed. Significant breaches to the COC are reported quarterly to the GNS Committee by the General Counsel.

Site management. The mine General Manager (GM) is accountable to the COO for management of site-level human rights risks and impacts. ESG teams and specific functions, such as procurement, implement programs and procedures that comply with applicable legislation, adhere to environmental impact assessment (EIA) and permit conditions, and align with corporate policies, standards and guidelines.

Stakeholder Engagement

Stakeholder engagement on human rights takes place at the site level. Key stakeholders include permitting authorities and other government agencies, business, NGOs, local communities and Indigenous Peoples. Sites adhere to conditions in EIAs and other regulatory requirements, which require community and/or Indigenous engagement and consider potential human rights impacts. Sites engage with local communities and Indigenous Peoples through a range of processes, and with supply chain stakeholders through the procurement process. Sites also maintain a local presence and have formal and informal relationships with community organizations, Indigenous organizations, and government agencies. For additional information on Capstone's stakeholders and our approach to engagement, see Stakeholder Categories and Engagement Approaches in our [2024 Sustainability Report](#).

Policy Commitments

Our policy commitments guide our approach to human rights.

Our [Code of Conduct Policy](#) (COC) sets our expectations for responsible business conduct. It guides us to respect the cultural values, beliefs and traditions of people in the countries and regions in which we operate, including the rights of Indigenous Peoples. It prohibits child or forced labour in our operations and supply chain.

Our [Human Rights Policy](#) commits us to respecting and promoting the human rights of all individuals, including the rights of Indigenous Peoples. The policy broadens the human rights-related commitments in our COC and includes commitments to:

- Reflect internationally recognized human rights laws and standards in our global policies and procedures
- Engage in dialogue with affected stakeholders, identify security-related human rights risks
- Confirm that child and forced labour are not present in our operations and
- Apply due diligence to minimize this risk in our supply chain

Our [Integrated Health Safety Environment and Community](#) Policy commits us to proactively identify and manage our impacts on the environment, people, and communities. It also guides us to mitigate negative impacts we cause or contribute to through preventive or remedial actions as required.

Our [Diversity and Inclusion Policy](#) commits us to create an inclusive culture where diversity is valued, and establishes guiding principles, including treating everyone with respect, embracing workforce diversity and ensuring inclusivity in stakeholder engagement with the objective of building strong relationships with diverse stakeholders.

Our [Whistleblower Policy](#) provides guidance for Capstone employees and stakeholders to report actual or suspected fraud, ethical concerns, violations company policies, breaches of law, human rights violations, and financial misconduct. It outlines the process for reporting ethical concerns and confirms Capstone's commitment to employee protection from retaliation.

Our [Supplier Code of Conduct Policy](#) (SCC) outlines our expectations that suppliers adhere to our COC and supporting policies and standards, including our Human Rights Policy, and operate in compliance with applicable laws and regulations. It also explicitly prohibits any form of forced and child labour.

Our [Responsible Sourcing Policy](#) defines our commitment to embedding Capstone's sustainability expectations and considerations into the selection and management of suppliers and buyers and to assessing sustainability risks, including human rights, in our supply chain.

Except for our Diversity and Inclusion and Responsible Sourcing policies, which apply only within our company, these policies apply to all Capstone employees, subsidiaries and suppliers (as defined in the SCC). We communicate all policies to new Board members, executives, and employees as part of the onboarding process. Annual training on the COC and supporting policies is provided to all employees at both the corporate and site levels. In addition, Board members, executives, and employees are required to review the COC and supporting policies annually and formally acknowledge their commitment to uphold them. As new policies are introduced, we provide targeted training to relevant roles to facilitate effective implementation. Procurement teams are responsible for communicating the SCC requirements to suppliers, who agree to comply by signing our supplier agreement. All policies are available on Capstone's [website](#).

Strategy

Our business strategy is built on a foundation of strong business ethics. Maintaining an ethical business culture and respecting human rights in our operations, communities and value chain helps maintain our license to operate and strengthens our ability to deliver long-term value in complex operating environments.

Our Sustainability Development Strategy prioritizes managing community impacts. We have developed a Social Performance Standard that will help us proactively and systematically manage impacts, including those to human rights. The Standard provides a framework for aligning with international best practices.

We pursue The Copper Mark award as part of our strategy to embed sustainability across operations. The Copper Mark includes multiple performance criteria related to different aspects of human rights and to

Indigenous Peoples' rights. Mantos Blancos and Mantoverde were awarded The Copper Mark in 2023. In August 2025, Pinto Valley was awarded The Copper Mark and Cozamin signed a letter of commitment to participate in The Copper Mark Assurance Process.

Management of Impacts and Risks

This section covers four key aspects of our Human Rights management approach:

- Human rights
- Security
- Responsible value chain
- Engagement with Indigenous Peoples

Human Rights

We comply with national laws and work to uphold international standards. Our Human Rights Policy sets out our commitment to protecting human rights in accordance with the laws of all countries in which we operate and international human rights laws and standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the United Nations Universal Declaration of Human Rights, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. We engage with and participate in processes with Indigenous Peoples as may be required under local permitting regulations.

We report on our efforts to identify and mitigate the risk of forced and child labour in our supply chain in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and Australia's *Modern Slavery Act 2018 (Cth)*. In compliance with Chile's Economic Crimes Law (Law No. 21.595), our Chilean operations have implemented enhanced supplier due diligence procedures, which include screening suppliers for risks including forced and child labour. (See our Fact Sheet [How We Manage Anti-corruption](#) for additional details.)

We manage human rights risks through our Enterprise Risk Management (ERM) Framework. Our new Social Performance Standard establishes requirements for identifying and managing human rights risks at each site, ensuring alignment with the ERM Framework. Human rights risks identified at the technical and operational levels, including through EIA processes, are further evaluated, managed, and reported through the ERM process. We regularly evaluate security risks to confirm our security procedures are proportionate to the risks we face.

We have developed a corporate Social Performance Standard. Corporate standards help create a shared understanding of sustainability priorities, aligning site-level efforts with Capstone's broader goals and policy objectives. The Social Performance Standard, adopted in 2025, outlines the minimum requirements for sites to identify, assess, and manage the social impacts, risks and opportunities associated with our business activities, including impacts on human rights. It requires sites to update social risk assessments, at least annually, to identify potential impacts to human rights and Indigenous Peoples rights.

We provide human rights training to our employees and Board. Board members and all employees globally are expected to review our policies annually—including our Code of Conduct and Human Rights Policy—and confirm in writing that they have read, understood and agree to comply. Employees across all sites also receive annual training on the COC and supporting policies, including our Human Rights Policy, which covers our human rights commitments. The Board receives the same training materials as employees as part of the annual policy acknowledgement. In addition to annual training, we may provide targeted training to strengthen our human rights due diligence. In 2024, modern slavery training was delivered to senior

leadership as well as procurement, human resources, and legal teams, both at corporate and at sites. Sites may provide additional training to address specific local risks or meet local requirements. For example, training at Mantos Blancos, Mantoverde, and Santo Domingo includes education on applicable Chilean labour legislation.

We conduct assessments to identify potential human rights risks. Site-level assessments help us identify potential human rights impacts in our operations as well as our operations' impacts on local communities. Mantoverde and Mantos Blancos conduct annual Human Rights Risk Assessments employing the Equator Principles requirements. These have been externally assessed through The Copper Mark Assurance Process. In 2024, Cozamin and Pinto Valley conducted internal human rights risk assessments against The Copper Mark forced labour and child labour criteria.

Our hiring guidelines reduce the risks of child and forced labour in our operations. Our guidelines, which apply to Capstone and all subsidiaries, are designed to uphold ethical labour standards and prevent child and forced labour in our operations. They require that all employees be at least 18 years old at the time of hire, and legally eligible to work in the country of employment. Verification is conducted by Human Resources prior to employment. Human Resources is also responsible for reviewing and approving any external recruitment agencies to ensure they follow ethical hiring practices and are compliant with all applicable labour laws.

We engage with communities to understand our impacts. Ongoing engagement with communities helps us identify and assess actual and potential human rights risks and impacts resulting from our activities. Sites conduct stakeholder mapping and engage with communities in their areas of influence to better understand community needs and interests. All sites have grievance mechanisms that allow community members and other stakeholders to raise any concerns they may have regarding our operations, impacts, or our business relationships.

Security

We consider human rights in our approach to security. Our Human Rights Policy commits us to operate in a manner consistent with the Voluntary Principles on Security and Human Rights. We implement risk-based, proportionate security measures at all sites and maintain full-time, unarmed security personnel to safeguard people and assets.

Our Cozamin operation in Mexico is situated in an area of conflict according to the Uppsala Conflict Data Program definition.¹ We adopt measures to protect our workforce and assets, including technology, controlled site access, and procedures and training to recognize and avoid personal security risks. We maintain strong relationships with relevant government authorities, industry groups and communities.

We provide human rights training to private security contractors at Mantos Blancos and Mantoverde, which includes training on the Voluntary Principles on Security and Human Rights and the UN Guiding Principles on Business and Human Rights.

Responsible Value Chain

Our global Responsible Sourcing Program helps us manage supply chain human rights impacts and risks. The program promotes a consistent, company-wide approach to managing our value chain human rights

¹ The Uppsala Conflict Data Program defines an armed conflict as a contested incompatibility over government and/or territory where the use of armed force between two parties, of which at least one is a government, results in at least 25 battle-related deaths in a calendar year

risks. It applies both to the procurement of goods and services and the supply of our products to downstream markets. We expect all suppliers to comply with applicable laws, as outlined in our SCC and Human Rights Policy. Both policies specifically prohibit child and forced labour. Site procurement teams are responsible for communicating the SCC requirements to suppliers who agree to comply when they sign our supplier agreements. Our Chilean sites have implemented enhanced supplier due diligence procedures, in alignment with Chile's Economic Crimes Law 21.595, which include screening for modern slavery risks. The enhanced procedures help us better identify higher-risk suppliers, and address risks prior to entering into agreements.

We conduct due diligence on all new customers through our corporate Know-Your-Customer screening process. We assess corporate, financial, legal and ESG risks, including human rights risks. If potential concerns are identified, we conduct enhanced due diligence and address risks prior to entering into agreements.

See our [2024 Modern Slavery Report](#) for additional details on our approach to mitigating forced and child labour in our supply chain.

Engagement with Indigenous Peoples

We engage with Indigenous Peoples to identify interests and potential impacts. At Pinto Valley, Mantoverde, and Santo Domingo we engage Indigenous Peoples through our community engagement processes and, when required, as part of regulatory processes.

In 2024, Chile's National Corporation for Indigenous Development (CONADI) recognized an Indigenous community group ("Costeños Ancestrales") near the Mantoverde desalination plant as belonging to the Chango People (first recognized by Chilean Indigenous Law in 2020). We have established a permanent worktable with the Costeños Ancestrales organization.

At Santo Domingo, we regularly engage with the four local Indigenous communities whose main offices are located in the town of Diego de Almagro. The ancestral lands of these groups, belonging to Colla People, are located in the Andean highlands and salt flats—areas not directly impacted by the mine site.

We protect Indigenous cultural heritage and resources. Native American cultural sites are present in the area surrounding Pinto Valley. Pinto Valley's Historic Properties Treatment Plan outlines measures to protect and preserve cultural resources² and heritage sites that may be impacted by current operations or future expansion. To date, Pinto Valley has adopted measures such as mapping natural and cultural sites, installing signage to alert workers and contractors to identified sites, and engaging tribal monitors in the identification, documentation, and recovery of cultural resources.

At Santo Domingo, our permit conditions commit us to protecting archaeological sites, training the workforce on site protection, and conducting archaeological monitoring during earthwork activities. Potential archaeological sites are incorporated into our construction plans.

We respect traditional livelihoods. Coastal residents near the Santo Domingo port area in Chile depend on the harvesting of seaweed and mollusks for their livelihoods. We are engaging with the residents, some of whom are Indigenous, to avoid interruptions to their harvesting activities.

² Cultural resource includes places and things of past or present human use that are of scientific, ethnic, religious, historical, or cultural interest. They include, but are not limited to, prehistoric and historical ruins, monuments, district, sites, buildings, structure, objects, artifacts, objects of antiquity, records, documents, shrines, Native American use areas and sacred places, and archaeological resources.

Monitoring and Continuous Improvement

We monitor our risks and assess the effectiveness of our management system. We monitor human rights-related concerns raised through our [Whistleblower Hotline](#) or site-level grievance procedures and conduct site-level risk assessments. We are working to strengthen our responsible supply chain approach through implementation of our Responsible Sourcing Program and further mapping risks in our supply chain.

We have processes for responding to stakeholder concerns. Stakeholders can report ethical and compliance concerns through our Whistleblower Hotline or site-level grievance procedures and seek remedy for negative impacts.

We track and report our performance on an annual basis. Please refer to our [2024 Sustainability Report](#) and [Data Book](#) for human rights performance data.

Metrics

Human rights indicators reported at the site and consolidated levels include:

- Percentage of proven and probable reserves in or near areas of conflict
- Percentage of proven and probable reserves in or near Indigenous Peoples' territories