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|  | Environmental, Social and Health and Safety Management System (ESHSMS) Policies | Code: POL/RRHH |
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HUMAN RESOURCES POLICY


| Prepared by: | Reviewed by: | Approved by: |
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| Area: Environmental & Social (E&S) Name: Viviana Brun Position: Environmental & Social Coordinator Signature:  Date: 18/08/25 | Area: Technical Management Name: Juan Pablo Nogués Position: Project Manager Signature: Date: 18/08/25 | Area: Presidency Name: James Spalding Position: President Signature: Date: 18/08/25 |

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VERSION HISTORY

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|--------------------------|--|-------------------------------|------------------------------|---|
| Version N° | 01 | | | |
| Date (dd/mm/yyyy) | 18/08/25 | | | |
| Changes | Inclusion of provision on prevention of Gender-Based Violence (GBV). | | | |
| Prepared by | Area: E&S | Name: Viviana Brun | Position: E&S Coordinator | Signature:  |
| Reviewed by | Area: Technical Management | Name: Juan Pablo Nogués | Position: Project Manager | Signature: |
| Approved by | Area: Presidency | Name: James Spalding | Position: President | Signature: |

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Human Resources Policy (POL/RRHH)

Guiding Principles (PRs)

- Compliance with the applicable provisions for the Project under the National Constitution of Paraguay, national laws and regulations, and the international standards to which the Project adheres on work and employment, particularly Law No. 213/93 “Labour Code” and IFC Performance Standard (PS) 2 “Labour and Working Conditions.”
- Respect and protection of internationally recognised human and labour rights, avoiding discrimination and promoting fair treatment.
- Recognition and respect of workers’ rights to form and join trade unions, as well as to participate in collective bargaining.
- Provision of working conditions that meet national legislation and international best practices (IFC PS2), ensuring that employment terms are fair and reasonable.
- Adoption of principles of fair treatment, equal opportunities, inclusion, and non-discrimination in the hiring, promotion, and compensation of workers, regardless of gender, ethnicity, nationality, sexual orientation, or religion.
- Promotion of the inclusion of people from communities within the Project’s area of influence in the workforce.
- Provision of a safe, healthy, and equitable work environment, considering the risks inherent to the sector and providing appropriate training to all workers.
- Commitment to establishing safe temporary support facilities for workers, in line with adopted standards and relevant local regulations.
- Provision of a mechanism to handle and respond to workers’ complaints, concerns, queries, and suggestions related to the Project.
- Prohibition of the use of forced or child labour, in compliance with national laws and IFC PS2 guidelines regarding minimum working age, verifying that contractors, subcontractors, and suppliers respect these principles.
- Prevention of Gender-Based Violence and Harassment (GBVH) in all operations and throughout the supply chain.

In order to fulfil this commitment, ATOME will manage the following in its activities:

- Provide all workers with documented, clear, and understandable information about their labour rights.
- Establish contractual requirements for contractors, subcontractors, and suppliers to comply with this policy and extend the commitment to fair treatment, equal opportunities, and inclusion in hiring, promotion, and compensation.
- Implement a code of ethics and conduct for workers, along with a procedure for disciplinary action in cases of discrimination or abuse.

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- Develop and implement a recruitment, promotion, and compensation plan that ensures dignified remuneration aligned with national legislation and regulations, skills, performance, responsibilities, and market practices.
- Require contractors, subcontractors, and suppliers to prohibit the use of child or forced labour.
- Implement clear guidelines for all contractors and subcontractors relocating personnel to the Project site, requiring thorough evaluations of conditions (safety, adequacy, accessibility, affordability) within the Project’s area of influence, ensuring compliance with IFC standards, ATOME policies, and national regulations.
- Maintain a grievance mechanism to handle and manage claims, concerns, and suggestions from workers. This mechanism will be available to both internal and third-party workers associated with the Project.
- Extend the principles of this policy to all consultants, contractors, and suppliers, and encourage them, in turn, to apply them to their subcontractors and suppliers.
- Maintain zero tolerance for situations involving gender-based violence and harassment (GBVH).
- Ensure secure and confidential procedures for reporting GBVH cases.
- Deliver mandatory training on respectful conduct and GBVH prevention.
- Monitor gender-disaggregated indicators.

As President of ATOME Paraguay S.A.E., I am committed to ensuring that the Company has an organizational structure and the necessary resources for the effective implementation of this Policy.

This Policy will be communicated and made accessible to all personnel at all hierarchical levels, including direct employees, contractors, or those representing the Company in any way. Implementation will be everyone's responsibility, and compliance will be required of employees, contractors, subcontractors, and suppliers.

The Human Resources Policy will be reviewed annually to ensure its relevance, effectiveness, and adequacy to the Project context.

This Policy also aligns with the principles established in the Corporate Policies on Sustainability, Ethics & Compliance, and Social Responsibility of ATOME PLC (United Kingdom), adapting their guidelines to the local context and ensuring compliance through the ESHS Management System (ESHS MS).

Signature:

Name: James Spalding

Position: President

Date: 18/08/25