

Free, Prior, and Informed Consent (FPIC) Policy

Mining Mineral Resources S.A.S

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1. Purpose and Scope

MMR is committed to fully implementing and enforcing the **Free, Prior, and Informed Consent (FPIC)** process when engaging with Indigenous Peoples whose lands, resources, or cultural heritage may be impacted by MMR's activities. This policy ensures that MMR's operations comply with **internationally recognized FPIC standards**, including the **UN Declaration on the Rights of Indigenous Peoples (UNDRIP)**, **International Labour Organization (ILO) Convention 169**, and **IFC Performance Standards**.

This policy applies to all MMR operations, projects, partnerships, subsidiaries, and affiliates.

2. Definition of FPIC

FPIC is the inherent right of Indigenous Peoples to **give or withhold** their consent to projects that may affect their lands, resources, or rights. The FPIC process must be **free, prior, informed, and respectful of Indigenous decision-making structures**:

- **Free:** No coercion, intimidation, or manipulation.
- **Prior:** Consent must be obtained **before** any project approvals or activities commence.
- **Informed:** Indigenous Peoples must have full access to all relevant project details, including risks, benefits, and alternatives, in an accessible format.
- **Consent:** Indigenous Peoples have the right to **accept or reject** a project, and their decision must be respected.

3. Commitments

MMR shall:

- **Respect Indigenous Rights:** Recognize and uphold Indigenous Peoples' right to self-determination and land sovereignty.
- **Engage Early and Respectfully:** Identify **all** potentially impacted Indigenous groups at the earliest project planning stages and engage with **recognized Indigenous leaders and governance structures**.
- **Conduct Comprehensive Impact Assessments:** Ensure that **environmental, social, and cultural impact assessments (ESIAs)** are conducted **before** project initiation, with Indigenous representatives actively involved in shaping impact assessment criteria.
- **Ensure Transparent and Accessible Information:** Provide information in culturally appropriate formats and languages that Indigenous Peoples can easily understand.

- **Respect the Right to Withhold Consent:** If consent is denied, MMR **shall not proceed** with the project until mutually acceptable terms are reached, with documented agreements signed by Indigenous representatives.
- **Implement an Accessible Grievance Mechanism:** Establish **culturally appropriate and independent** grievance mechanisms with external oversight for fairness.
- **Monitor and Report Compliance:** Conduct **independent audits** and publish **annual FPIC compliance reports**, ensuring Indigenous stakeholders have access to these reports.

4. FPIC Implementation Framework

To ensure **consistent and enforceable** FPIC practices, MMR will:

Step 1: Early Identification & Engagement

- Identify **all** potentially impacted Indigenous groups **before project approvals**.
- Recognize and engage with legitimate Indigenous representatives and governance structures.
- Develop a **clear engagement plan** that aligns with Indigenous timelines and decision-making processes.

Step 2: Consultation & Consent Process

- Provide **detailed project information**, including risks and benefits.
- Ensure Indigenous Peoples have sufficient **time, legal support, and advisory resources**.
- Conduct consultations **in good faith**, allowing Indigenous communities to **freely deliberate** and reach their decision **without pressure**.
- **Document the entire consent process**, making agreements publicly accessible to Indigenous stakeholders.

Step 3: Documentation & Verification

- Maintain **detailed records** of the consent process, including community feedback and agreements.
- Ensure mutual agreement is documented and accessible to Indigenous Peoples.
- Utilize **third-party oversight** to verify FPIC compliance.

Step 4: Continuous Engagement & Compliance Monitoring

- Maintain regular communication with Indigenous communities throughout the project lifecycle.
- Implement a grievance resolution system with transparent response timelines and independent review mechanisms.
- Conduct **annual independent audits** and **publicly disclose** FPIC compliance reports.

5. Responsibilities & Enforcement

- **Executive Management:** Ensure FPIC policy enforcement and allocate necessary resources.
- **Project Managers:** Integrate FPIC into project planning and execution.
- **Community Relations Team:** Lead culturally appropriate engagement with Indigenous groups.
- **Legal & Compliance Team:** Monitor FPIC adherence and legal obligations.
- **Independent Review Panel:** Conduct third-party assessments of FPIC implementation.

6. Grievance Mechanism

MMR shall establish an accessible, confidential, and culturally appropriate grievance system for Indigenous Peoples:

- Complaints shall be acknowledged **within 7 days**.
- A proposed resolution shall be provided **within 30 days**.
- An **independent oversight body** will ensure fairness in dispute resolution.
- Appeals can be submitted to an **external review body** if initial resolutions are unsatisfactory.

7. Review & Continuous Improvement

This policy shall be reviewed **annually**, incorporating:

- Input from Indigenous Peoples through direct consultations.
- Updates to international FPIC standards and best practices.
- Findings from independent audits and stakeholder feedback.

8. Conclusion

MMR is committed to full compliance with FPIC principles to ensure Indigenous rights, land sovereignty, and self-determination are upheld. Through rigorous enforcement, continuous engagement, and transparent reporting, MMR seeks to set a global standard for ethical and responsible mining practices.

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