

CORNISH METALS PLC

**For the avoidance of doubt
this Policy applies to South Crofty Ltd., an indirect subsidiary of Cornish Metals plc**

DIVERSITY, EQUALITY AND INCLUSION POLICY

1. Purpose of this Policy

Cornish Metals plc and its subsidiaries (the “**Group**”) promote a culture that values difference and eliminates discrimination in the workplace. The purpose of this Diversity, Equality and Inclusion Policy (the “**Policy**”) is to convey the principles underlying our commitment to conducting business in a responsible manner that is respectful to all.

2. Who does this Policy apply to?

This Policy applies to all directors, officers and employees of the Group (“**Personnel**”). Policy awareness training forms part of the induction process for new Personnel and all existing Personnel receive training on how to comply with this Policy. We require our Personnel at all levels to comply with this Policy.

This Policy is available to all interested parties through the Company’s [website](#). We will inform consultants, contractors and other business partners about this Policy and share our expectations that they will observe and uphold our position on diversity, equality and inclusion whilst on our premises and all sites directly or indirectly controlled by the Group.

3. Responsibility for this Policy

While the board of directors (the “**Board**”) has overall responsibility for this Policy, the Chairman is responsible for the implementation and monitoring of the policy in relation to directors and executive management, and the Chief Financial Officer (CFO) is responsible for implementation and monitoring in relation to other employees. Furthermore, all Personnel are responsible and accountable in their role to ensure that the aims of this Policy are met and have an obligation to bring any identified issues forward to management for resolution.

4. Policy commitment

We are committed to fostering a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect. We commit to compliance with applicable laws and regulations in all jurisdictions in which we operate and maintain a zero-tolerance approach to discrimination in any form. We commit to equal treatment of all management and employees, regardless of personal characteristics protected under the UK Equality Act 2010 including age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (“**Protected Characteristics**”). The Group recognises that diversity provides a wider range of perspectives and can thus enhance the decision making of the Board and management team. Recognising difference and valuing everyone’s contribution can have the added benefit of enhancing employee satisfaction and retention.

5. Guiding principles

To deliver on our commitments as we embed workplace diversity, equality and inclusion into our business, we will:

- (a) ensure that our workplace is free from all forms of discrimination, harassment, intimidation or bullying;
- (b) recruit and promote Personnel when required based upon merit, ability and contribution to the role, using processes that are free from all forms of discrimination, while continuing to align with a commitment to local hiring;
- (c) apply the principles of equality to all Personnel, consultants, contractors, other business partners and visitors;
- (d) maintain a welcoming and inclusive workplace environment that is sensitive to individual differences and needs;
- (e) make reasonable adjustments to enable employees with disabilities and/or health issues to work effectively and to their full potential;
- (f) promote awareness of the Group's workplace equality and diversity commitments and expectations to Personnel, consultants, contractors and other business partners; and
- (g) provide accessible grievance mechanisms, as described within the Staff Handbook, for employees to raise concerns or complaints in relation to aspects covered by this policy.

6. Discrimination

Personnel must not unlawfully discriminate against or harass other people, including current and former staff, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this Policy and are unlawful:

- a) Direct discrimination: treating someone less favourably because of a Protected Characteristic.
- b) Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified.
- c) Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- d) Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- e) Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Guidance for Personnel, with examples of these types of discrimination, is provided within the Staff Handbook.

7. Review

This Policy will be updated over time to maintain alignment with the Group's evolving sustainability programme. The Board shall review this Policy annually and make changes as required.

Approved by the Board of Directors of Cornish Metals plc on 15 December 2025.