

Human Rights

In November 2022, the Board approved a People and Human Rights Policy. This policy affirms our commitment to operate in a way that respects human rights, as described in the UN Guiding Principles on Business and Human Rights (UNGPs). It is informed by the International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and its two optional protocols; and the United Nations Declaration on the Rights of Indigenous Peoples; the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Among several specific commitments, we are committed to a due diligence process including:

- Conducting human rights risk assessments of our operations, to identify any actual or potential human rights impacts;
- Implementing programs and measures to prevent and mitigate any such impacts;
- Adopting grievance mechanisms and providing remedies to correct any negative impacts;
- Monitoring and reporting on actual and potential human rights impacts every year.

Human Rights Due Diligence

A human rights impact assessment was started in Q4 2021 as part of our responsibility under the UNGPs and in alignment with the Organisation for Economic Co-operation and Development (OECD) guidelines. The initial phase considered all human rights with the exclusion of those managed as operational risks (impacts on the environment and occupational health and safety). The assessment demonstrated that, based on evidence, there are no adverse impacts to rightsholders caused by Largo. There is a low risk of individuals being discriminated against based on gender, sexual orientation or race, as we have formal human resource procedures in place to ensure that all employees are treated equitably. Largo has several programs in place to promote positive impacts on human rights internally and in the communities.

Largo has a responsibility to provide a safe workplace, free of harassment, to all. We continually strive to enhance the visibility of our ethics hotline, the primary channel for reporting incidents of harassment. The hotline also provides the workflow for the next steps such as collecting evidence, analysis by the committee and implementing any necessary corrective actions. Consequences for inappropriate behaviour are tailored to each case, varying from a feedback conversation to a formal warning, suspension and dismissal.



Grievance Mechanisms

Largo is committed to implementing grievance mechanisms and access to remedy through its People and Human Rights Policy. Stakeholders can raise grievances and seek remedies through a variety of mechanisms, including the judicial system (criminal and civil actions), government-run offices, the union and the collective bargaining process. In areas of direct and indirect influence on the community by the Company, the Enterprise Monitoring Committee (CAE – Comissão de Acompanhamento do Empreendimento) provides alternative avenues.

Preventing Impacts

Largo operates in a highly regulated industry with 100% of our employees and major on-site suppliers in Brazil under collective bargaining. We maintain an open-door culture for employees and contractors and scheduled engagements with our community stakeholders. In our nine years of operation, Largo has handled a nominal number of minor grievances in a proactive and conciliatory way, resulting in positive outcomes.

All new employees receive training that includes Largo's policies and values, commitment to safety and guarantee of workplace free of discrimination and harassment.

Largo's operations are rigidly controlled, with frequent inspections from government agencies. Employees and contractors must supply government documents showing proof of age, medical exams, social security number, etc.

Security personnel at Largo are contracted through a service provider, they are unarmed. They are certified and have received at least 20 hours of Human Rights training, and must pass psychological exams and renew their certification every two years.

Our suppliers are all considered to be of low risk for human rights violations. A new system for direct (Tier 1) supplier screening was contracted and is in place as of January 2023. This system will provide statistics and data that will support the prioritization of our indirect (Tier 2) risk assessment. There are no obvious at-risk sectors like agriculture or textiles in our Tier 2 suppliers.