



Grahe Mining Salone Ltd. Code of Ethics and Conduct

Freetown - Sierra Leone

Summary

Foreword	2
1. Respect for Local Communities and Active Engagement.....	2
1.1 Collaboration with Communities.....	2
1.2 Transparency and Trust	2
1.3 Remuneration and Benefits Policy.....	2
2. Environmental Responsibility	2
2.1 Minimization of Environmental Impact.....	2
2.2 Responsible Water Resource Management.....	2
2.3 Environmental Restoration and Rehabilitation	3
3. Workplace Health and Safety	3
3.1 Well-being and Safety	3
4. Human Rights and Labor Standards.....	3
4.1 Dignity and Respect for Workers.....	3
4.2 Training and Development.....	3
4.3 Equal Opportunities	3
5. Individual and Corporate Integrity	3
5.1 Ethical Conduct and Transparency.....	3
5.2 Anti-Corruption Commitment	4
5.3 Conflict of Interest Management	4
6. Responsibility Towards the Future	4
6.1 Long-Term Sustainability	4
6.2 Innovation and Continuous Improvement	4
7. Conclusion.....	4

Foreword

Grahe Mining Salone Ltd is committed to conducting its business activities in Africa with a strong sense of responsibility, respect for the environment, and dedication to the well-being of local communities. Our commitment extends beyond the creation of economic value and includes a deep connection with the people and the territories in which we operate. Through this Code of Ethics and Conduct, we set forth the principles and standards of behavior that guide our operations.

1. Respect for Local Communities and Active Engagement

1.1 Collaboration with Communities

We respect the rights of indigenous and traditional populations, including land rights, cultural identity, and self-determination, in compliance with international standards. The Company is committed to actively engaging villages and local communities at all stages of its operations. Corporate decisions shall take into account the needs and rights of local communities. We are committed to fostering dialogue, addressing concerns, and seeking shared solutions.

1.2 Transparency and Trust

We guarantee the highest level of transparency in the management of funds allocated to local communities, through public reporting and direct involvement of communities in the management of social projects. The trust of local communities is the cornerstone of our success.

1.3 Remuneration and Benefits Policy

Grahe Mining Salone Ltd undertakes to ensure fair wages to its employees, in compliance with applicable laws, and to allocate on a monthly basis a share of net profits (30–50%) through production bonuses for employees and through social development projects for local communities. Such projects are jointly evaluated by Grahe Mining Salone Ltd and community representatives, and are aimed at addressing specific community needs (e.g., infrastructure, agricultural support, schools, scholarships, sponsorships, and other initiatives).

2. Environmental Responsibility

2.1 Minimization of Environmental Impact

We commit to minimizing the environmental impact of our operations by employing modern technologies to monitor and mitigate soil erosion, water contamination, and air pollution.

2.2 Responsible Water Resource Management

Recognizing the vital importance of water resources, we commit to their responsible and sustainable use. Practices will be adopted to minimize water consumption and prevent contamination of local water sources. All activities shall be preceded by a thorough assessment of available water resources and the implementation of a management plan.

2.3 Environmental Restoration and Rehabilitation

At the conclusion of mining operations, we are committed to restoring and rehabilitating the environment, seeking to return it, as far as practicable, to its natural state. We will invest in biodiversity regeneration and the recovery of natural resources.

3. Workplace Health and Safety

3.1 Well-being and Safety

The Company is committed to creating a safe and healthy workplace, promoting awareness of occupational risks and responsible behavior, with the aim of protecting employees' well-being, preserving corporate reputation, and preventing accidents and occupational diseases.

4. Human Rights and Labor Standards

4.1 Dignity and Respect for Workers

All employees of Grahe Mining Salone Ltd are to be treated with dignity and respect. We do not tolerate any form of discrimination, exploitation, or abuse. Workers' rights shall be protected, and safe and healthy working conditions ensured. Child labor and any form of exploitation are strictly prohibited.

4.2 Training and Development

We invest in the continuous training of our employees so that they may enhance their skills and achieve professional growth. Professional development is fundamental to the success and growth of the Company and to the improvement of people's living conditions.

4.3 Equal Opportunities

The Company promotes diversity and equal opportunities, fostering an inclusive work environment free from discrimination based on gender, ethnicity, religion, sexual orientation, or any other status.

5. Individual and Corporate Integrity

5.1 Ethical Conduct and Transparency

The Company is committed to acting with the highest integrity and transparency. All business activities and decisions are undertaken with a sense of responsibility, without ever compromising the interests of local communities or the environment. A dedicated internal reporting channel is available to employees and stakeholders to confidentially or anonymously report violations of this Code. Whistleblowers shall be protected from any form of retaliation. The Company reserves the right to terminate its relationship with any employee, partner, or community in the event of proven violations of this Code, applicable laws, or any other circumstance that undermines trust, productivity, or collaboration.

5.2 Anti-Corruption Commitment

Grahe Mining Salone Ltd rejects all forms of corruption. Employees and partners are required to uphold the highest ethical standards. Any form of corruption, whether direct or indirect, is strictly prohibited and subject to disciplinary measures.

5.3 Conflict of Interest Management

At all times, conflicts of interest must be avoided. Team members and partners are required to promptly disclose any situation that may give rise to an actual or potential conflict of interest.

6. Responsibility Towards the Future

6.1 Long-Term Sustainability

Sustainability is a guiding principle in all of our operations. Our goal is to build a business model that is both economically and socially sustainable, leaving a lasting positive impact on local communities and the environment.

6.2 Innovation and Continuous Improvement

We continuously seek innovative solutions to improve our business practices, reduce environmental impact, and enhance people's quality of life. Innovation is essential to our progress and to the development of the communities we support.

7. Conclusion

This Code of Ethics and Conduct is inspired by the principles of the United Nations Global Compact, the Sustainable Development Goals (SDGs), and the OECD Guidelines for Responsible Business Conduct. Grahe Mining Salone Ltd undertakes to comply with, and to ensure compliance with, the principles contained in this Code by all employees, contractors, and partners. Through integrity, respect for people and the environment, and the promotion of transparency, we aim to serve as a reference model in the African mining and production sectors. This Code is not merely a guideline but a concrete commitment to a fairer, more sustainable, and shared future.

Freetown settembre 2025

