



DIVERSITY POLICY

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Chairman Bernard R. Pryor **Chief Executive Officer** David H. Brown **Chief Financial Officer** Brenda Berlin

Non-executive directors Peter G. Cordin, Andrew D. Mifflin, Khomotso B. Mosehla, Thabo F. Mosololi, Shangren Ding, An Chee Sin, Brian He Zhen

MC MINING LIMITED (the "COMPANY")

The Company is committed to actively managing diversity as a means of enhancing its performance by recognising and utilising the contribution of diverse skills and talent from its directors, officers and employees.

Diversity involves recognising and valuing the unique contribution people can make based on their individual background and different skills, experiences and perspectives, including persons with co-existing domestic responsibilities. Diversity results from a range of factors including age, gender, ethnicity, cultural background, race or other personal factors. The Company values the differences between its people and the contribution these differences make.

The Diversity Policy, together with the Company's Employment Equity Policy (according to the South African labour legislation), is based on the concept of equal employment opportunities for all and non-discrimination. The essence of this policy is to create an equitable employment environment that supports organisational effectiveness, where individuals who have the will and competence can develop rewarding careers and in so doing to achieve a diverse workforce broadly representative of the people.

Role of the Board

It is the responsibility of the Board of Directors to foster an environment where:

1. Individual differences are respected.
2. The ability to contribute and access employment opportunities is based on performance, skill and merit.
3. Inappropriate attitudes, behaviours and stereotypes are confronted and eliminated.

Objectives

The Company encourages diversity in employment, and in the composition of its Board, as a means of ensuring an appropriate mix of skills and talent to conduct its business and achieve its goals.

Specifically, the Company will provide equal opportunities in respect to employment and employment conditions, including:

1. **Hiring:**
The Board will ensure appropriate selection criteria based on diverse skills, experience and perspectives is used when hiring new staff, including Board members. Job specifications, advertisements, application forms and contracts will not contain any

direct or inferred discrimination. The Board is empowered to engage professional consultants to assist in the hiring process by presenting diverse candidates to the Company for consideration.

2. Training:

All internal and external training opportunities will be based on merit and in light of Company and individual needs. The Board will consider senior management training and executive mentoring programs to develop skills and experience to prepare employees for senior management and Board positions.

3. Career Advancement:

All decisions associated with career advancement, including promotions, transfers, and other assignments, will meet the Company's needs and be determined on skill and merit.

Achieving diversity

As a priority, the Company will focus on the participation of women on its Board and within senior management. The Board will set measurable objectives for achieving gender diversity that are appropriate for the Company, which will be disclosed in the Company's Annual Report.

The measurable objectives to be set may include:

- procedural/structural objectives;
- initiatives and programs and/or targets in respect of:
 - the number of women employed by (or who are consultants to) the economic group controlled by the Company;
 - the number of women on the Board;
 - the nature of the roles in which women are employed, including on full time, part time or contracted bases, and in leadership, management, professional speciality or supporting roles; and
 - the relative participation of men and women at different remuneration bands.

The Board may also set measurable objectives in relation to other aspects of diversity that are appropriate for the Company. These objectives may also include procedural/structural objectives, initiatives and programs and/or targets in respect of:

- the number of persons employed by (or who are consultants to) the economic group controlled by the Company;
- the number of persons on the Board;

- the nature of the roles in which persons are employed, including on full time, part time or contracted bases, and in leadership, management, professional speciality or supporting roles; and
- the participation of persons at different remuneration bands, each by reference to age, ethnicity and cultural background.

Work environment

The Company will ensure that all officers, employees and contractors have access to a work environment that is free from harassment. The Company will not permit unwanted conduct based on an officer, employee or contractor's personal circumstances or characteristics.

The Board and senior managers are required to ensure that the work environment is harassment free, and to ensure that complainants or reports of sexual, racial or other harassment are treated seriously, confidentially, and sympathetically by the Company.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with the Company's Diversity Policy and report violations or suspected violations in accordance with this Policy.

The Board will proactively monitor Company performance in meeting the standards and policies outlined in this Policy. This will include an annual review of the diversity objectives set by the Board, and its progress in achieving them.

The Board will consider setting key performance indicators for the Board, the Chief Executive Officer and senior executives that are linked to the achievement of the diversity objectives set by the Board.

Compliance with this Policy

Any breach of compliance with this Policy is to be reported directly to the Chief Executive Officer or Chair, as appropriate. Anyone breaching this Policy may be subject to disciplinary action, including termination.

SUMMARY OF THE DIVERSITY POLICY

The Board has adopted a Diversity Policy which describes the Company's commitment to ensuring a diverse mix of skills and talent exists amongst its directors, officers and employees, to enhance Company performance. The Diversity Policy addresses equal opportunities in the hiring, training and career advancement of directors, officers and employees. The Policy outlines the process by which the Board will set measurable objectives to achieve the aims of its Diversity Policy, with particular focus on gender diversity within the Company. The Board is responsible for monitoring Company performance in meeting the Diversity Policy requirements, including the achievement of diversity objectives.