

Harassment and Bullying Policy

INTRODUCTION

Osino Gold Exploration and Mining (Pty) Ltd (Osino) is committed to maintaining a work environment where all individuals are treated with dignity and respect and are free from harassment and bullying.

Osino defines harassment as any unwanted behaviour - persistent or isolated - that undermines individual dignity, including overt acts like shouting or threats, as well as subtle actions such as exclusion from work activities or rumour-spreading. Bullying is defined as intimidating or offensive behaviour or an abuse or misuse of power that causes emotional or physical harm through undermining others.

Harassment and bullying, whether direct or indirect, whether they be isolated incidents or repeated behaviour, undermine our values and create a toxic workplace environment.

This Policy, which complies with Namibian legislation, protects everyone engaged with our business and outlines clear standards, expectations, and confidential reporting mechanisms so that serious issues are addressed promptly, impartially, and respectfully.

APPLICABILITY

This Policy is mandatory and applies to Osino employees, vendors (contractors, service providers, suppliers and other third parties), and other stakeholders who interact with our personnel. Further, it applies to all workplace interactions, including both on-site and off-site environments, emails and within any other digital platforms.

COMMITMENTS

To uphold Osino's zero-tolerance approach to harassment and bullying, we make the following commitments:

Communication and dissemination of governance documentation

Osino commits to implementing and maintaining effective communication processes to ensure that all employees, vendors, and other relevant stakeholders are informed of Osino's position prohibiting harassment and bullying. Additionally, we are committed to:

- Training employees and contractors to recognise, prevent, and address harassment and bullying
- Promoting awareness of this Policy
- Providing access to support services, including counselling and guidance from relevant NGOs
- Ensuring that all reported incidents are investigated and resolved promptly, confidentially and impartially

Compliance and enforcement

These commitments are implemented and monitored by:

- Ensuring compliance with this policy across all our on-site and off-site activities
- Reserving the right to conduct due diligence exercises within our supply chain to assess compliance with this Policy
- Providing regular training and awareness programmes for our workforce and encouraging our vendors and other relevant stakeholders to do likewise
- Evaluating key metrics, including incident reports, training sessions conducted, and outcomes of investigations

Reporting mechanisms

Osino commits to having confidential and non-retaliatory mechanisms in place for reporting any incidents of harassment and bullying. Reports can be made using:

- Public complaints: Public Grievance Mechanism (available on our website)
- Employment-related grievances: Employee Grievance Mechanism

Confidentiality and anonymity

Osino will treat all reports with the utmost confidentiality. The reporting party may choose to report anonymously. Identities will only be disclosed with the individual's consent or as required by law. The reporting party and witnesses will be protected from reprisal.

Protection from prejudicial action

Osino is committed to protecting the anonymity of reporting parties involved in harassment and bullying incidents and will ensure they are not prejudged. Prejudicial action may include being:

- Subjected to disciplinary action
- Dismissed, suspended, harassed, intimidated or demoted
- Transferred involuntarily
- Refused a transfer or promotion
- Subjected to conditions of employment or retirement that were changed to their disadvantage
- Refused a reference or given an adverse reference
- Denied an appointment to any service or position
- Threatened with any of the above actions
- Otherwise adversely affected in respect of their service or position, including employment opportunities and work security

VIOLATIONS AND REPORTING

Any violations of this Policy may result in contract termination, reporting to the authorities and legal action. In addition, failure to report violations or involvement in bribery and corruption may result in disciplinary action, contract termination or legal prosecution.

Employees, vendors, and other third parties must report concerns or grievances using one of the following:

- The Public Grievance Mechanism (see our website)
- The Whistleblower Mechanism (see our website)
- By contacting senior management

MONITORING AND REVIEWING

Progress against these commitments will be monitored and reported annually to management. This Policy will be reviewed as necessary to reflect changes in legislation, regulatory requirements or related best practices. Osino reserves the right to amend or update this Policy as required.

Osino reserves the right to conduct audits and investigations where harassment and bullying concerns arise.

Tianhang Zhang

Chief Executive Officer (CEO)

29 September 2025