



## INDIGENOUS PEOPLE POLICY

### 1. Purpose and Scope

This Indigenous People Policy is adopted by the Board to demonstrate Marula's commitment to respecting the rights, cultures, and interests of indigenous peoples, in accordance with the United Nations Declaration on the Rights of Indigenous People, the UK QCA Corporate Governance Code, and the AQSE Rulebook.

The Policy applies to all directors, officers, employees, and consultants of the Company and its subsidiaries.

### 2. Governance and Accountability

The Board is responsible for oversight and implementation of this Policy.

- The Policy forms part of the Company's governance framework and is reviewed annually by the Board.
- The Board ensures compliance with all applicable laws and regulations relating to indigenous peoples and their communities.
- The Board reports annually on the effectiveness and implementation of this Policy, as required by AQSE Rulebook and QCA Code.

### 3. Stakeholder Engagement

The Company will:

- Engage and consult with indigenous peoples early and regularly, in a culturally appropriate, meaningful, open, and mutually respectful manner, consistent with the principles of Free, Prior and Informed Consent.
- Ensure effective representation and participation of indigenous peoples in decisions affecting them.
- Provide accessible grievance mechanisms for feedback, complaints, or concerns.
- Promote socio-economic opportunities for indigenous peoples through employment, business development, and local community investment.

### 4. Risk Management and Cultural Heritage

The Company will:

- Identify, assess, and preserve cultural heritage, lands, and communities in partnership with indigenous peoples.

- Avoid involuntary relocation or resettlement, ensuring compliance with government regulations and conditions.
- Provide regular staff training on indigenous peoples' engagement and cultural awareness.

## **5. Transparency and Disclosure**

- The Company maintains transparent practices, including regular and clear disclosure regarding the implementation and effectiveness of this Policy, in line with AQSE and QCA requirements.
- The Company will publish updates and annual reviews of this Policy on its website and in regulatory filings.

## **6. Non-Compliance**

- All instances of non-compliance are treated seriously and may result in disciplinary action, including dismissal or removal of the person(s) concerned.
- The Board will report material breaches to shareholders and regulators as required.

## **7. Review and Continuous Improvement**

The Board will review this Policy at least annually and update it as required to ensure ongoing alignment with the UK QCA Code, AQSE Rulebook, and evolving best practices.

The most recent review was conducted on 15 April 2026.

The Board of Directors approved this Policy on 7 May 2026.