

May 28th, 2025

[REDACTED]
Officer-in-charge
Special Procedures Branch
United Nations High Commissioner for Human Rights
Geneva, Switzerland
Ohchr-registry@un.org

And to:

Mary Lawlor, Special Rapporteur on the situation of human rights defenders

Lyra Jakulevičienė, Chair-Rapporteur of the Working Group on the issue of human rights and transnational corporations and other business enterprises

Astid Puentes Riaño, Special Rapporteur on the human right to a clean, healthy and sustainable environment

Pedro Arrojo-Agudo, Special Rapporteur on the human rights to safe drinking water and sanitation

Subject: Response to communication Ref. AL OTH 21/2025

Dear Mesdames, et Messieurs,

Please accept this letter in response to your letter of March 6, 2025 REF AL OTH 21/2025 (the “Letter”) related to alleged acts of intimidation of the human rights defenders Ms. Mayerly López Carreño and Mr. Hernán Alberto Morantes, in the context of their work as human rights defenders in the department of Santander, Colombia. Please excuse our delay in responding to this letter; unfortunately, two of the e-mails to which the March 6th letter was submitted were incorrect (marketsodaschel@aris-mining.com and relationskcordero@aris-mining.com) and the third e-mail, info@aris-mining.com was inadvertently flagged as junk mail.

We welcome this dialogue and reaffirm our unwavering commitment to human rights, environmental stewardship, and transparent stakeholder engagement.

1. Introduction and Context:

Aris Mining (the “Company”) currently operates the Segovia and Marmato mines in Colombia and is also the majority owner (51%) and operator of the Soto Norte Project, located in Santander, Colombia. The latter is a development-stage project, currently undergoing technical assessments, environmental studies, and the development of community-centered social programs. Accordingly, there are no mineral extraction activities currently taking place.

We are proud participants in several international frameworks that guide and strengthen our commitment to human rights and responsible business conduct, including:

- UN Global Compact
- UN Women’s Empowerment Principles (WEPs)
- OECD Due Diligence Guidance for Responsible Mineral Supply Chains
- Towards Sustainable Mining (TSM)
- Extractive Industries Transparency Initiative (EITI)
- Voluntary Principles Initiative (VPI)

We have a robust grievance and whistleblower platform at each of our operations and corporate offices which allows any stakeholder, be it an employee, consultant, contractor or other stakeholder, to report any grievances they may have, all of which are promptly investigated and appropriate remedial action taken. This platform is easily accessed through Aris Mining’s website (www.aris-mining.com) and annual training on its use is provided to Aris Mining’s



employees. We also publish an annual Sustainability Report in which we document our ESG performance throughout our operations.

Specifically with regards to the Soto Norte Project, we have also developed and implemented the “Soto Norte Social Agreement”, a collaborative platform co-created by Aris Mining with over 1,800 local stakeholders, regional authorities and academia. The development of this agreement has helped shape our social investment strategy and stakeholder engagement process, which aims to improve the lives of more than 25,000 people through programs in environmental stewardship, education, health, infrastructure, and economic development.

It should be noted that the Soto Norte Social Agreement has been a process that has been inclusive and collaborative, where divergent points of view are addressed and consensus reached, enhancing the social license for our project. We believe that a robust dialogue between the Company and its stakeholders is key to achieving local economic development, environmental stewardship, and strengthening of the local social fabric. Any human rights defender, including Ms. López Carreño and Mr. Morantes, are invited to participate in this platform to share their views and help reach an even broader consensus.

2. Additional information and/or comment(s) on the allegations:

Aris Mining has not participated, nor does it condone, the alleged acts of intimidation against Ms. López Carreño and Mr. Morantes, as outlined in your Letter. Specifically, Aris Mining was not a party to and did not promote or contribute to, directly or indirectly, the preparation or dissemination of the alleged pamphlet. The Company remains fully committed to respecting, protecting, and promoting human rights in all our operations and areas of influence. Upon review of our internal grievance and whistleblower system, Aris Mining has not received any reports from the individuals identified in your letter.

Ms. López Carreño and Mr. Morantes’ efforts to protect human rights, including the rights to safe drinking water and to a clean, healthy, sustainable environment are fully consistent with our vision for all of Aris Mining’s operations, including the future Soto Norte Project. During the development of our environmental and social baseline, for the future submission of our Environmental Impact Assessment (EIA), we have prioritized water management and sustainably protecting the environment, as key elements to create a project that adequately addresses these issues. Indeed, local stakeholders who also believe in responsible, environmentally friendly mining, have voiced their support for our approach to the environment and sustainable mining practices.

In this context it is important to highlight that Aris Mining, as one of the few industrial scale mine operators in Colombia and with its assets located in historical mining districts, has designed and implemented a mutually beneficial business model over many years to not just coexist but collaborate with small-scale mining groups, known as Contract Mining Partners (CMPs). Pursuant to this partnership model, CMPs at Aris Mining’s operations are able to focus on what they do best, mineral extraction, while Aris Mining complements their activities with licensed processing plants and best practices waste disposal mechanisms. This collaboration results in significant prevention of environmental damage and protection of water resources by avoiding the hazardous environmental impacts that inevitably occur when ore is processed outside permitted facilities.

Aris Mining also assists CMPs with their mining processes by transferring technical, operational, health and safety, environmental, regulatory and financial know-how to the CMPs which empowers them and strengthens their mining practices.

We believe that the future of Soto Norte, a traditional informal mining area, can also benefit from this shift from informal to formalized mining. Using the formalization model we have created at our Segovia and Marmato operations, we believe a partnership with CALIMEROS, a company incorporated in 2019 by 160 traditional miners, would pave the way to protecting the region’s water resources.



In furtherance of this vision, the Soto Norte Project awarded a formalization mining subcontract¹ to CALIMINEROS. This subcontract was authorized by the National Mining Agency and registered in the National Mining Registry in 2021. Once the Colombian environmental authority grants Aris Mining an environmental license for the Soto Norte Project, the effect of the subcontract will be to require the CALIMINEROS miners to extract ore in compliance with all Colombian environmental, labor, health and safety regulations.

Finally, it should be noted that the Company has respected and will continue to respect, the delimitation of the Santurbán massif, as ordered by the Constitutional Court and the Temporary Reserve Zone in all its activities.

3. Human rights due diligence measures and measures to protect the human right to a clean, healthy and sustainable environment and measures adopted by Aris Mining to prevent, identify and remedy any adverse human rights impacts of its activities, or that of its subsidiaries or subcontractors in the department of Santander, Colombia, in particular on the rights of human rights defenders.

Aris Mining conducts a comprehensive Human Rights Due Diligence process, aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines. Our approach includes:

- Human Rights Risk Assessment identifying actual and potential risks;
- Human Rights Report, which assessed management performance and defined improvements;
- evaluation of our Human Rights Management System, including business risk and salient human rights issues;
- regular training programs for employees, contractors, community leaders, and especially security personnel, based on the Voluntary Principles on Security and Human Rights; and
- child labor prevention.

Through these and other efforts, we promote not only the right to a clean, healthy, and sustainable environment, but also the protection of those who defend it. Aris Mining complies with the UNGPs through a structured framework of policies, standards, and governance mechanisms, which include:

Aris Mining has the following Board-approved policies, all of which are publicly available on the Company's website:²

- Human Rights Declaration aligned with the UNGPs;
- Sustainability Policy to ensure internal and external stakeholder engagement and compliance;
- Supplier Code of Conduct, requiring respect for labor rights, nondiscrimination, freedom of association, and a prohibition on harassment and retaliation, among other human rights;
- Whistleblower Policy which sets forth the principles to which the Company is committed in ensuring a confidential and anonymous process exists whereby stakeholders can report business conduct concerns relating to the Company; and
- Business Conduct & Ethics Policy which outlines the fundamental principles of legal and ethical business conduct which must be followed by our directors, officers, employees and others who are performing services for or on behalf of the Company, in the performance of their responsibilities with respect to the Company's business.

Aris Mining also has:

- a Sustainability Committee approved Environment and Corporate Social Responsibility Policy which outlines the principles to which the Company is committed in furtherance of the management of its potential impact on the environment and local communities;
- a CEO-approved Statement of Adoption of the OECD Due Diligence Guidance.

¹ Mining subcontracts are legal contracts, endorsed by the National Mining Authority, and operate to formalize traditional miners, whereby the tenement holder grants these miners an area within one of their tenements, to allow these miners to perform exploitation activities, provided the miners do so in a permitted environment by obtaining an environmental license from the environmental authority.

² Available at: <https://aris-mining.com/about-us/corporate-governance/>



Our policies are publicly available, regularly disseminated through internal platforms and enforced with all employees, consultants and contractors. We conduct annual training of our employees to ensure company-wide understanding and compliance.

4. Measures taken by Aris Mining to ensure the implementation of the UNGPs, including information on whether Aris Mining has established or participates in any operational-level grievance mechanisms, to provide access to remedy for affected individuals and communities.

Regarding access to remedy and oversight, we have implemented:

- operations-level grievance mechanisms accessible both online and in-person with each report investigated and remedial action taken, where applicable, within 15 days of receiving the report;
- a confidential whistleblower platform whereby reports are submitted directly to the Company's Chair of the Audit Committee, General Counsel & Corporate Secretary and Chief Operating Officer;
- Board and Sustainability Committee oversight of all corporate policies and ESG matters; and
- operations review by our Compliance Officer.

Additional measures we have undertaken, include:

A. EQUIPARES Seal - Equipares Silver Certification

Aris Mining is the first gold mining company in Colombia to receive the Equipares Silver Certification, a distinction awarded by the Colombian Ministry of Labor and the United Nations Development Programme (UNDP) that recognizes our sustained efforts to close gender gaps and promote gender equality. Specific actions include:

- implementing diversity, equity, and inclusion (DEI) policies;
- promoting equal pay and inclusive hiring practices; and
- maintaining a safe, respectful workplace free from harassment and discrimination.

B. OECD - Implementation of the OECD Due Diligence Guidance for Aris Mining and its Supply Chain

Aris Mining is committed to aligning its operations with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals. This includes:

- identifying risks related to human rights violations, environmental damage, the financing of illegal armed groups, and money laundering, in accordance with the OECD guidelines;
- evaluating these risks in order to establish effective mitigation measures tailored to each specific issue;
- monitoring and tracking these risks and mitigation actions through an updated risk matrix; and
- formalizing a political commitment to comply with the OECD guidelines by drafting and adopting an official statement of adherence.

C. ESCAZÚ - Strengthening Organizational Capacity and Environmental Leadership within the Framework of the Escazú Agreement

In line with the principles of the Escazú Agreement, Aris Mining is working to strengthen the capacities of local environmental leaders and their organizations by:

- enhancing awareness and understanding of the Escazú Agreement among local leaders;
- offering a certified online course—with pre-registration—designed to deepen knowledge about the agreement and its practical applications; and
- preparing and supporting the participation of a selected environmental leader in the Annual Forum on Human Rights Defenders in Environmental Matters in Latin America and the Caribbean,



organized by the Economic Commission for Latin America and the Caribbean (ECLAC) in May 2025.

D. EITI – Extractive Industries Transparency Initiative, Fostering Social Dialogue and Accountability

The Extractive Industries Transparency Initiative (EITI) is a global standard that brings together governments, companies, civil society organizations, and multilateral institutions to promote the open and responsible governance of oil, gas, and mineral resources. Aris Mining contributes to EITI's goals and the strengthening of governance in Colombia's extractive sector through the following actions:

- coordinating with national government officials to ensure participation in at least four Local Committee (CML) meetings;
- managing the technical secretariat of the CML in Segovia;
- preparing and presenting the EITI municipal reports to share with the respective CMLs;
- organizing eight community meetings in Segovia to present the subnational EITI initiative and to address priority topics identified by the CML;
- delivering the final EITI report for the municipality; and
- sharing progress from the EITI report with participants in the National Technical Committee.

E. Regenerative Mining and the “Formalize to Regenerate” Strategy

Aris Mining is proud to be a pioneer in Colombia's “Formalize to Regenerate” strategy, led by CORANTIOQUIA (Environmental Corporation of Antioquia). This initiative promotes legal compliance, environmental regeneration, and the protection of the social and economic fabric of communities.

Key objectives of the Strategy include:

- promoting responsible practices that reduce environmental and social impacts;
- restoring social cohesion and improving collective well-being;
- ensuring decent working conditions and integrating small-scale miners into the formal legal framework; and
- reducing informal mining practices.

Conclusion

In closing, Aris Mining remains steadfast in its commitment to human rights, environmental sustainability, and the development of responsible mining practices that create long-term value for all stakeholders. We continuously strive to set a national and regional standard for ethical mining, transparency, and inclusive engagement.

In response to the allegations outlined in your Letter regarding the intimidation of Ms. López Carreño and Mr. Morantes both in the digital pamphlet and otherwise, we remain steadfast in our assertion that we do not and have not participated in, nor do we condone, the intimidation of anyone, including Ms. López Carreño and Mr. Morantes. Further, we were not involved in any way with the preparation or dissemination of the alleged digital pamphlet and do not in any way condone the same.

We reiterate our willingness to cooperate fully with national and international authorities to clarify and address any concerns, human rights related or otherwise, and we emphasize that our work in Soto Norte is marked by transparent, inclusive, and participatory dialogue with communities, civil society organizations, and institutional partners. Aris Mining insists on its commitment to the defense of human rights and rejects any threat to defenders of environmental rights. Furthermore, the Company insists that it has been carrying out its work in the Province of Soto Norte, as in all its projects, under the strictest adherence to international principles and its internal policies for the promotion and protection of human rights

We respectfully suggest the UN Special Rapporteurs visit the Soto Norte region, where you will have the opportunity to meet local stakeholders, observe community-led initiatives, and witness the depth of our commitment to sustainable development and human rights.



We remain available to provide any additional information or clarification upon request.

Please accept my assurances of the highest consideration,

On behalf of **ARIS MINING CORPORATION**



NEIL WOODYER, CEO
Aris Mining Corporation