



# HUMAN RIGHTS POLICY

Dated August 9, 2024

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## I. INTRODUCTION

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The board of directors (the "**Board**") of G Mining Ventures Corp. ("**GMIN**" or the "**Corporation**") has always recognized the crucial importance of human rights in the context of its activities and wishes to formalize the foregoing by adopting this human rights policy (this "**Policy**").

In an environment where mining can have significant impacts on local communities as well as a country's economy, the environment and people's rights, GMIN is committed to adopting practices that promote and protect the human rights of all parties involved in, or impacted by its mining activities. This document sets out GMIN's objectives, commitments, practices and procedures articulating its approach regarding human rights, and reflects its core values and vision of sustainable development and social responsibility. This Policy is linked and is applicable in conjunction with the following policies, standards, procedures and guidelines:

- the Corporation's:
  - Environmental Policy,
  - Occupational Health and Safety Policy,
  - Policy Against Harassment & Discrimination in Workplace,
  - Whistleblowing Policy,
  - Diversity Policy,
  - Social and Community Policy, and
  - Code of Ethics and Business Conduct.

As well as the:

- TSM – Towards Sustainable Mining,
- International Letter of Human Rights, comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights (UN: 1948),
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the eight ILO Core Conventions,
- Guiding Principles on Business and Human Rights (UN: 2011),
- Principles of Mining (International Council on Mining and Metals - ICMM: 2022),
- Voluntary Principles on Security and Human Rights (VPSHR: 2022),
- Global Industry Standard on Tailings Management (GISTM),
- Cyanide Management Code, and
- 10 principles of the Global Compact (UN: 2000).

As such policies, standards, procedures and guidelines may be amended, complemented, modified, replaced, restated and/or supplemented from time to time.

## II. SCOPE

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The scope of this policy reflects GMIN's commitment to human rights, sustainability, and social responsibility. It should be reviewed periodically to ensure it remains relevant and effective in light of changes in industry practices, legislation, and technology.

The commitment outlined in this Policy applies to GMIN and all its subsidiaries. GMIN expects all employees, whether hired directly or outsourced, on a permanent or temporary basis, working full-time or part-time, to adopt the Corporation's commitment to respect human rights in the conduct of their activities.

The application of this Policy is independent of physical workplaces, roles and activities during the life cycles of the activities carried out. This Policy covers, without exception, all positions and hierarchical levels, including executives and managers, and extends to trainees, apprentices, and volunteers. It must also be observed, without exception, by employees, consultants, service providers, or anyone else acting on behalf of the Corporation in the course of their duties when interacting with the external public.

## III. COMMITMENTS

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1. **Implementation of training:** Target training 100% of employees in matters respecting human rights; annual retraining will also be carried out.
2. **Creation of dialogue channels:** Establish, maintain and continuously seek to enhance efficient communication channels with local communities and indigenous people to include productive dialogue on human right matters in the first year following the adoption of this Policy.
3. **Social and environmental impact assessment:** Carry out annual social and environmental impact assessments to identify areas for improvement in the human rights domain.
4. **Report development:** Publish annual human right reports detailing progress, challenges, future plans and related matters.
5. **Contractual Clauses:** Include contractual clauses on human rights commitments consistent with the Universal Declaration of Human Rights and require suppliers to notify GMIN of any human rights issues related to their activities.
6. These commitments will be integrated into the Corporation's governance structure, with the

support of the Board and management, with adequate resources for their effective implementation. Management must ensure that progress and achievements in respect of these commitments are regularly communicated to the Board and all levels of the organization (GMIN and its subsidiaries), and must be incorporated into all activities.

#### IV. OBJECTIVES

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The Corporation continuously strives to:

1. **Respect human dignity:** by ensuring that everyone associated with the Corporation and its subsidiaries is treated with dignity and respect.
2. **Guarantee labor rights:** by ensuring fair, safe and inclusive working conditions, and by respecting all labor rights.
3. **Foster community development:** by maintaining an honest dialogue with local communities and contributing to their sustainable development.
4. **Protect the rights of indigenous people:** by respecting and promoting the participation of indigenous peoples in decisions that impact their lives.
5. **Ensure transparency and accountability:** by operating in a transparent manner and being accountable for its actions and the impacts ensuing therefrom.
6. **Promote Equal Opportunities:** by fostering an inclusive work environment that promotes diversity and equal opportunities for all, regardless of gender, race, ethnicity, religion, or any other attributes or characteristics.
7. **Combat Discrimination and Harassment:** by implementing strict policies and procedures to prevent, address, and remedy any instances of discrimination, harassment, or bullying within the workplace.
8. **Support Employee Well-being:** by promoting the health and well-being of employees through (without limitation) wellness programs, mental health support, and fostering employees' work-life balance.
9. **Maintain an Ethical Supply Chain Management:** by ensuring that all suppliers and business partners adhere to ethical standards and respect human rights in their operations.
10. **Maintain a Sound Environmental Stewardship:** by committing to environmental sustainability, notably by minimizing the ecological footprint, reducing waste, and promoting conservation and biodiversity.
11. **Ensure Adequate Human Rights Training:** Provide ongoing training and education to employees and stakeholders on human rights issues and the importance of ethical behavior.

#### V. IMPLEMENTATION

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The Corporation condemns abuse of power and inhumane treatment and actively works to ensure and promote non-discrimination and respect for individuals' privacy.

### **Human rights due diligence**

GMIN will conduct a human rights due diligence process annually, following these steps:

- Identify and assess actual and potential adverse human rights impacts associated with the Corporation's operations, products, services, and value chain.
- Implement practices to stop, prevent, and mitigate adverse impacts, integrating these measures into internal processes, with responsibilities assigned to the appropriate levels and functions.
- Monitor the effectiveness of controls and the outcomes of the implemented measures.
- Maintain and continuously oversee a complaints and grievances mechanism to receive, process, and resolve internal and external complaints and grievances, in accordance with the criteria established in the operational procedures.
- Communicate identified impacts and the measures taken to address them.

### **Employees**

GMIN and each of its subsidiaries will:

- Respect employees' rights in accordance with labor laws applicable in the jurisdictions in which it conducts business.
- Provide suitable working conditions that comply with internationally recognized human rights standards.
- Implement structured, transparent, and effective selection processes, with an emphasis on local hiring.
- Ensure that all employees are treated with dignity and are free from any form of harassment or violence, whether physical or psychological.
- Respect employees' and stakeholders' rights to privacy.
- Uphold the rights to information, free movement, freedom of expression, and free association.
- Implement policies and practices to promote inclusion and diversity within the company.
- Respect the rights to information and collective bargaining.
- Not tolerate any form of forced labor, child labor, or work performed under conditions analogous to slavery.

### **Local communities**

GMIN and each of its subsidiaries will:

- Respect the right to life and safety, ensuring a safe work environment.
- Establish effective communication and engagement with communities affected by the Corporation's activities.
- Conduct human rights impact assessments in collaboration with stakeholders and implement

appropriate measures.

- Uphold the rights and traditional practices of indigenous peoples and local communities.
- Promote good environmental practices and social investments in local communities to support human rights.
- Promote the active participation and consultation of indigenous peoples in decisions that impact their lives,
- Establish clear and accessible communication channels and implement culturally appropriate engagement practices.

### **Suppliers, clients and other business relationships**

GMIN and each of its subsidiaries will:

- Ensure that all stakeholders within the value chain and other business relationships are informed about the key aspects of this Policy.
- Incorporate the conditions and expectations of this Policy in contracts with suppliers, clients and other business connections.
- Maintain pre-qualification processes for the value chain and other business relationships, focusing on identified risks and impacts.
- Provide thorough training to representatives of the value chain and other business relationships to promote the understanding and implementation of this Policy.
- Enforce a strict prohibition on forced, child, or slavery-like labor within the value chain.

### **Violations**

Any breach of this Policy will result in penalties as outlined in the contractual documents, as well as potential liability for damages to be assumed by GMIN, its directors and officers, and potentially third parties with who it does business. Any violation of the principles or guidelines in this Policy must be reported through the Corporation's Stakeholder Grievance Mechanism (accepting complaints, claims, suggestions, compliments, and feedback) described below.

Brazauro has established its Relationship Portal as a comprehensive Stakeholder Grievance Mechanism to address and resolve internal and external expressions, including complaints, grievances, and reports. This structured system encompasses procedures for receiving, registering, managing such complaints, grievances or reports, and allowing the Corporation to respond to these issues effectively. It aims to provide a platform for stakeholders to voice their concerns and seek resolution in a transparent and accountable manner. This Relationship Portal is designed to foster open communication and facilitate the appropriate handling of manifestations within the organization.

Furthermore, this Relationship Portal at GMIN ensures that access to other legal or administrative

remedies available under the law is not obstructed, nor does it impede existing arbitration procedures. If the Corporation acknowledges its responsibility for negative human rights impacts, whether through internal due diligence processes or reports received through whistleblowing mechanisms, it also commits to developing action plans. These plans will outline corrective and disciplinary measures, with a key focus on engaging affected rights holders in the decision-making process and monitoring the implementation of these measures to address the identified impacts effectively.

As a subsequent step, this Relationship Portal, now working at an operational level, will be fully deployed throughout the Corporation's organization.

### **Management of the Human Rights Policy**

In line with the principles and guidelines outlined in this Policy, GMIN defines specific responsibilities to uphold its commitments hereunder, including but not limited to:

- The Board of Directors holds the responsibility for approving and overseeing the implementation of this Policy.
- Leaders, including the Corporation's directors officers and senior managers, are tasked with ensuring the implementation and enforcement of this Policy within their respective areas of operation. They are also accountable for ensuring that their team members are informed about, and adhere to this Policy.
- The Sustainability department is assigned the responsibility of organizing and executing a work plan for the Policy's implementation. Additionally, leadership of that department is mandated to identify the various other departments of the Corporation that should collaborate to support its execution. The Sustainability department will also:
  - Establish and execute human rights training programs to actively involve all staff members.
  - Roll out the Stakeholder Manifestation Mechanism to allow stakeholders to raise concerns without fear of reprisal.
  - Develop and conduct awareness-building and advocacy campaigns on human rights to actively engage all employees.
- Legal and/or Compliance functions will participate in the execution and inquiry tasks related to the Stakeholder Grievance Mechanism, incorporating processes to investigate any breaches of the guidelines and other provisions outlined in this Policy.

## **VI. CONSIDERATIONS AND REVIEW**

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GMIN reaffirms its commitment to human rights, seeing them as central pillars for building an ethical and sustainable business. This Policy is a reflection of GMIN's ongoing commitment to human dignity, equality and the well-being of all stakeholders. GMIN will implement this Policy rigorously and responsibly, ensuring a fair and respectful working environment, promoting sustainable development and valuing the voices of local communities and indigenous people. In doing so, GMIN will strive not





only to minimize risks, but also to maximize social, economic and environmental benefits, building a reputation for trust and integrity in the mining sector.

This Policy may need to be revised to ensure compliance with updated laws and regulations, incorporate technological advances, respond to incidents or near misses, and meet the recommendations of audits and risk assessments.

#### VII. ENTRY INTO FORCE

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This Policy was adopted by the Board on August 9, 2024.