

Human Rights Policy

INTRODUCTION

Adriatic Metals is committed to respecting human rights and supports the Universal Declaration of Human Rights and the United Nations' Guiding Principles on Business and Human Rights. We recognise and support the International Labour Organization's core labour standards. We strive to ensure that the rights of every individual within our workforce, and every individual or community with whom we interact, are upheld and respected. We recognise that in many situations economic development and environmental responsibility are fundamental to the realisation of rights and the importance of working, where appropriate and feasible, in partnership with governments, civil society and other businesses.

PRINCIPLES

Adriatic Metals is committed to:

- complying with all applicable legal requirements and other rules, codes and standards to which we subscribe;
- providing a fair, stable and safe working environment for our employees and contractors;
- respecting the livelihoods, cultural values, traditions and beliefs of the communities associated with our operations, including by managing our social and environmental impacts;
- prohibiting unlawful discrimination including on the basis of gender, ethnicity, religious belief or other attributes as well as unfair discriminatory practices when it comes to recruitment, training, and promotion;
- supporting equal opportunity and treatment, fair remuneration, and diversity in our organisation;
- upholding individual privacy and freedom of thought, expression, belief and opinion;
- treating our workforce with dignity and not tolerating any form of violence, bullying or harassment; and
- ensuring that personnel responsible for security conduct themselves in accordance with the Voluntary Principles on Security and Human Rights).

Adriatic Metals is committed to embedding this Policy in our corporate culture and practices. We will:

- ensure we have in place a mechanism through which employees can raise matters of concern and workplace-related grievances in line with the recommendations of the UN Guiding Principles on Business and Human Rights;
- engage with internal and external stakeholders on human rights issues, including through training, ensuring all stakeholders are aware of complaints and grievance procedures available to them and feel empowered to raise potential issues with the company;
- work to ensure respect of human rights by personnel, both private and public, providing security to Adriatic's facilities; and
- incorporate human rights-related issues in due diligence for relevant business processes and human rights-related requirements in contractual arrangements with business partners as appropriate.

APPLICATION

Responsibility for the application of this Policy rests with, but is not limited to, all Company employees and contractors engaged in these activities under the Company's operational control.

Every employee shares a responsibility for compliance with this policy. The Company's managers are responsible for promoting and ensuring compliance with the Policy and any relevant business unit or departmental policies.

MONITORING AND REVIEW

The Board will periodically monitor the content, effectiveness and implementation of this Human Rights Policy.

Material breaches of this Human Rights Policy will be reported to the Company's Board of Directors (Board) and the ESG Committee of the Board.

Stakeholders are invited to comment on this Human Rights Policy and suggest ways in which it may be improved. Comments, suggestions and queries should be addressed to the Board.

Approved by the Company's Board of Directors on 6th November 2020.

Adopted by the Company on 9th November 2020