

**DATED JULY 26, 2023**

## **1. Purpose**

K92 Mining Inc. together with all of its subsidiaries (collectively “K92”, we, or the “Company”) is committed to respecting local and internationally recognized human rights including those set out in the International Bill of Human Rights and the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work, in line with the United Nations Guiding Principles on Business and Human Rights. The Company has developed this human rights policy (the “Policy”). The purpose of the Policy is to describe the Company’s commitments to these standards in support of human rights, and to summarize how the commitments will be implemented and administered by K92.

## **2. Application of Policy**

The Policy applies to all of the Company’s directors, employees, contractors and consultants (“personnel”).

## **3. K92’s Commitment to Human Rights Principles**

Personnel are to conduct Company business according to the following principles:

- a) Treat everyone with respect and dignity.
- b) Foster a workplace free of harassment and discrimination.
- c) Promote diversity and inclusion in the workplace.
- d) Prohibit forced, bonded, trafficked and child labour.
- e) Recruit ethically.
- f) Provide fair wages and benefits.
- g) Promote and protect health and safety.
- h) Recognize and respect the cultural values, traditions and beliefs of the communities and host countries where we operate.

## **4. Meet International Human Rights Principles and Host-government Legal Requirements**

We meet the laws of the countries in which we operate, and where conflicts exist between the Policy and applicable local laws, we will meet local laws while seeking to meet the commitments in the Policy to the extent possible.

## 5. Implementation of the Policy

K92 will implement the Policy by:

- a) Communicating the Policy to our personnel, host communities and suppliers.
- b) Working to assess, and take appropriate action, regarding potential relevant human rights risks in our operations and supply chain through ongoing human rights due diligence processes, including conducting human rights assessments.
- c) Establishing and maintaining a culturally appropriate grievance mechanism for human rights complaints to be reported and addressed.
- d) While recognizing that youth employment and student work can be carried out lawfully and can contribute positively to the development of children and young people, meeting or exceeding the ILO general minimum age for admission to employment or work, and taking steps to verify that children do not carry out work that interferes with their education or right to leisure.
- e) Reporting on our performance against our human rights objectives and targets including reporting on the measures we take to prevent and reduce the risk that forced labour, prison labour and child labour are used in any stage of our operations.
- f) Providing human rights training to employees and to contractors in relevant roles.
- g) Embedding the Policy in K92's procedures and processes.
- h) Conducting security operations in a manner consistent with security and human rights.

## 6. Supplier Compliance with Policy

Suppliers are expected to comply with contractual requirements and to respect human rights in a manner consistent with the Policy or such higher standards as required by applicable law or contract when conducting Company business.

## 7. Reporting of Complaints

Personnel and others are encouraged to speak up about any concerns or suspected violations of the Policy ("**Reports**"). Reports can be made to an immediate supervisor or to the Chair of the Audit Committee through the methods described in Schedule "A".

## 8. Safeguards Against Retaliation

The Company understands and acknowledges that a decision to report can be a difficult one to make. Those who raise serious concerns should have nothing to fear. The Company will not tolerate any retaliation) and will take appropriate action to protect those who raise any concerns under the Policy in good faith (a "**Concerned Person**").

## **9. Confidentiality and Anonymity**

All expressions of concern or reports made by Concerned Persons will be treated to the extent possible on an anonymous and confidential basis. Concerned Persons are permitted to express concern or make a report on an anonymous and confidential basis. In a rare case, the absence of identifying and contact information may mean action cannot be taken because to do so will identify the source of the concern or complaint. In some instances, for example involving a breach of law or harm or risk, the Company may need to take action.

## **10. Queries**

Any questions about the Policy or how it should be followed in a particular case can be sent to an immediate supervisor or to the Chair of the Audit Committee.

## **11. Review of Policy**

This Policy will be reviewed by the K92 board of directors on an annual basis.

## **EFFECTIVE DATE**

This policy was adopted by the Board on July 26, 2023.

## Human Rights Policy

### Schedule "A"

**Reports can be made in writing to:**

K92 Mining Inc.  
c/o Audit Committee Chair – Mr. Saurabh Handa (Confidential)  
1090 West Georgia Street, Suite 488  
Vancouver, BC  
Canada  
V6E 3V7

**By email to:** [report@k92whistleblower.com](mailto:report@k92whistleblower.com)