

1. Purpose

K92 Mining Inc., together with 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 International Labour Organization (“ILO”) 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”) to describe the Company’s commitments to human rights, and to summarize how these 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

Recognizing that respect for human rights is an essential part of good business practice and risk management, we are committed to:

- a) Avoiding infringing the human rights of personnel, workers in our supply chain, or the rights of members of communities affected by our operations.
- b) Carrying out human rights due diligence, including risk assessments at our operations and in our supply chain.
- c) Maintaining processes to prevent, investigate, mitigate and resolve potential human rights issues.
- d) Upholding an equitable, diverse and inclusive workplace, including fair pay practices.
- e) Maintaining and communicating a requirement that suppliers respect human rights.
- f) Not tolerating the use of forced labour or child labour (as those terms are defined by the ILO).
- g) Providing accessible, anonymous feedback and grievance methods.

4. Meeting 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. K92 will not directly employ anyone under the age of eighteen (18) years old.

5. Reporting of Complaints

Personnel and others are encouraged to question and report any concerns or suspected violations of the Policy (“**Reports**”). Concerns, questions and Reports can be brought to an immediate supervisor, or to the Chair of the Audit Committee through the methods described in Schedule “A”.

Reports may also be made through the Company’s mine site-level grievance mechanism.

Safeguards Against Retaliation

The Company understands and acknowledges that a decision to report can be a difficult one to make. The Company will take appropriate action to protect anyone who raises any concern under the Policy in good faith (a “**Concerned Person**”) and will not tolerate any retaliation against a Concerned Person.

6. Confidentiality and Anonymity

All expressions of concern, questions and reports made by Concerned Persons will be treated to the extent possible on an anonymous and confidential basis. Concerned Persons are permitted to express concerns, ask questions 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.

7. 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.

8. Review of Policy

This Policy will be reviewed by the K92 Board of Directors on an annual basis.

EFFECTIVE DATE

This policy was reviewed and updated by the Board of Directors and effective on May 22, 2024.

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

Or by email to: report@K92whistleblower.com