

Responsible Production and Supply Policy

The Responsible Production and Supply Policy applies to all Sherritt's wholly-owned operations, its subsidiaries, and applicable suppliers. Every reasonable effort will be made to promote the guiding principles and commitments of the Policy in dealings with joint venture partners and affiliated companies.

- Sherritt commits to:
 - Implementing the five-step due diligence process as outlined in Annex I of the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (CAHRAs);
 - Encouraging joint venture partners and subsidiaries to adopt and incorporate in contracts and/or agreements with mineral feed suppliers, policies on responsible sourcing of minerals from CAHRAs;
 - Refraining from any action that may contribute to the financing of conflict or promotion of human rights abuses; and
 - Complying with relevant Canadian and United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.
- Sherritt will evaluate whether mineral feed is sourced from or transits through CAHRAs as defined by the OECD and manage any risks identified.
- Sherritt and its subsidiaries will neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the commission by any party of:
 - Any forms of torture, cruel, inhuman, and degrading treatment;
 - Any forms of forced or compulsory labour, which means work or service which is extracted from any person under the menace of penalty and for which said person has not offered themselves voluntarily;
 - Child labour;
 - Other gross human rights violations and abuses such as widespread sexual violence; and
 - War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.
- Sherritt and its subsidiaries will immediately suspend or discontinue engagement with upstream mineral suppliers where a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined by the OECD is identified.
- Sherritt and its subsidiaries will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals.
- Sherritt and its subsidiaries will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, where minerals in the supply chain are extracted through artisanal or small-scale mining (ASM).
- Sherritt and its subsidiaries will
 - Agree to eliminate direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders
 - Recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law;
 - Commit to or require that contracted security forces be engaged in accordance with the Voluntary Principles on Security and Human Rights;
 - Support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved; and
 - Support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through ASM, to adverse impacts associated with the presence of security forces, public or private, on mine sites.
- Sherritt and its subsidiaries will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport, and export.
- Sherritt and its subsidiaries will support efforts, or take steps, to contribute to the effective elimination of money laundering where a reasonable risk from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers has been identified.
- Sherritt commits to disclosing all taxes, fees, and royalties related to mineral extraction, trade, or export that are paid to governments in accordance with Canadian Extractive Sector Transparency Measures Act requirements, which align with the Extractive Industry Transparency Initiative principles.

Upholding these commitments is the responsibility of all employees and mineral feed suppliers.