

Human Rights Policy

The purpose of the Human Rights Policy is to affirm Sherritt International Corporation's commitment to operate in a way that respects human rights as set forth in the United Nations (UN) Universal Declaration of Human Rights (UDHR). The Policy applies to all wholly owned Sherritt operations, its subsidiaries, and applicable contractors and suppliers.

- Sherritt will operate its business in a way that respects human rights as set forth in the UDHR and internationally recognized human rights frameworks. The company will put in place systems and controls consistent with the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO), and the Mining Association of Canada's Towards Sustainable Mining requirements to ensure that Sherritt and its employees are not directly or indirectly complicit in the violation of human rights.
- Sherritt commits to respecting the rights of all stakeholders, with an emphasis on the rights of vulnerable individuals, groups and communities that may be impacted by its operations; including, but not limited to, children, women, and Indigenous peoples.
- Sherritt will comply with local legislation or corporate policies and procedures, whichever is more stringent.
- Sherritt will establish and maintain effective grievance mechanisms at the operations to receive, investigate and report on any concerns from those who believe their rights have been infringed upon or that have the potential or may be perceived to have a negative impact on human rights. This mechanism must be designed to allow stakeholders to be kept informed of any grievances, while still guaranteeing anonymity of those who report.
- Sherritt will ensure that personnel or human resources policies and practices at its operations respect the fundamental rights of employees as articulated by the ILO's Declaration on Fundamental Principles and Rights at Work and related Conventions, as well as the rights protected under the Canadian Charter of Rights and Freedoms, the applicable employment, labour, human rights, and occupational health and safety laws in Alberta and Ontario including:

- The freedom of association and the effective recognition of the right to collective bargaining;
 - The elimination of all forms of forced or compulsory labour, including but not limited to servitude, human trafficking and exploitation;
 - The protection of Child's rights, safety, and security;
 - The elimination of discrimination in respect of employment and occupation;
 - The regulation of working hours and overtime hours to ensure adequate rest from work;
 - The provision of fair wages, paid holidays, and adequate and decent accommodation; and
 - The establishment of constructive mechanisms where employees can seek redress for violations of any of these rights without recrimination.
- Sherritt will ensure that the security arrangements for the company's operations respect human rights and are consistent with the Voluntary Principles on Security and Human Rights.
 - Sherritt expects contractors, consultants, suppliers, and joint venture partners to share the company's human rights commitments.
 - Sherritt commits to informing all relevant stakeholders, including contractors and suppliers of our Human Rights Policy, our expectations and requirements, and undertaking our own due diligence of their practices, policies, and reputation as appropriate.

Sherritt's management is accountable for providing the necessary management systems and resources to ensure full compliance with this Policy. Employees, contractors, and suppliers are accountable for participating in the implementation of this Policy and adhering to its commitments.

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.

Upholding these commitments is the responsibility of all employees, contractors, and suppliers.