





Corporate Responsibility Policy

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Document Administration

Document Management

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Version History

Version	Description of Version Changes
1.0	Initial (2018)
2.0	Revised (2020: same document re-signed by the new CEO)
3.0	Revised (2021: to reflect and comply with the <i>Policy Document Management Standard</i> , align with the recently defined Company purpose and revised values, and to provide clarity, including various clerical and administrative changes)
3.1	Revised in 2024 with housekeeping changes only (aligned defined terms, related Policy Documents, etc.)
3.2	Revised (2025: company name and logo changes; alignment of Defined Terms)

Related Policy Documents

Document Number	Document Title
GRP-PO-LEG-01 V.10	<i>Code of Business Conduct and Ethics</i>
GRP-PO-LEG-04 V.4.2	<i>Anti-Bribery and Anti-Corruption Policy</i>
GRP-ST-EHS-05 V.2.1	<i>Human Rights Standard</i>
GRP-ST-EHS-09 V.1.0	<i>Community Investment Standard</i>
GRP-ST-EHS-02 V.1.0	<i>Arsenic Materials Management Standard</i>
GRP-ST-EHS-04 V.2.0	<i>Tailings Management Standard</i>



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1. Defined Terms

The following terms and acronyms are integral to the understanding of this Policy and its Related Policy Documents and have the meanings assigned within this Section or as referenced herein:

Term	Definition
Board Member(s)	As a group or individually, any member of the DPM Board or any member of the board of directors of any DPM subsidiary or any individual delegated equivalent authority by the shareholder(s) of such entity.
Closure	The process of securing a Site physically and chemically once it has been decommissioned. Closure typically refers to the period where short-term activities, including, but not limited to, the demolition of infrastructure and re-sloping and re-vegetation of land are performed.
Community	In aggregate, persons or groups of persons living and/or working in areas adjacent to Company operations, or at distance, and that are, or reasonably can be expected to be, economically, socially, or environmentally impacted by the Company's activities.
Company or Group	DPM and all its directly and indirectly owned subsidiaries, collectively.
DPM	DPM Metals Inc. (the parent company incorporated in Canada).
Employee	An individual engaged by the Company on a full-time or part-time permanent, fixed term, or temporary basis, as well as a secondment employee, student, intern, or apprentice. For clarity, Employees also include officers.
Executive Committee	As a group, the President & Chief Executive Officer and all executive vice presidents and senior vice presidents of DPM.
External Stakeholder	An external party (individual, company, or other entity) that reasonably can be expected to be impacted by the Company's activities or whose actions reasonably can be expected to affect the ability of the Company to meet its purpose and successfully achieve its strategic objectives. External Stakeholders include, but are not limited to, Third Parties, existing and potential shareholders, Communities, Public Officials, Governmental Authorities, and Non-Governmental Organizations (NGOs).
Interdependent Safety Culture	The most advanced stage on the dependent - independent - interdependent safety culture maturity curve, which is characterized by a team of Employees and Third Parties who feel ownership and responsibility for safety culture and have the shared belief that zero injuries is an attainable goal.
Global Industry Standard on Tailings Management	A standard that establishes a framework for safe tailings facility management, aiming to prevent catastrophic failure and enhance safety of mine tailings facilities across the globe, which was launched in August 2020, by the United Nations Environment Programme, the Principles for Responsible Investment and the International Council on Mining and Metals with Dr. Bruno Oberle, and shall include any amended, updated or revised version thereof.
Government Authority	Any: (i) national, federal, state, local or municipal government; or (ii) governmental, quasi-governmental, public or statutory authority of any nature (including any governmental division, department, agency, regulatory or administrative authority, commission, instrumentality, official, organization, unit, body, or entity and any court, judicial or arbitral body, or other tribunal).



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Term	Definition
Government Controlled Entity	- Any institution, organization or other incorporated or non-incorporated legal entity owned, wholly funded and/or otherwise controlled by a Government Authority (e.g. by appointment of management). Examples of such entities include but are not limited to government medical/healthcare facilities, government educational institutions, national / public utility, telecommunication, transportation companies, etc.
Human Rights	As described in the <i>Universal Declaration of Human Rights</i> adopted in 1948 by the United Nations General Assembly, basic rights, and fundamental freedoms of all human beings.
Net Positive Impact (and Six Capitals)	Measured over the long-term, positive cumulative value creation, resulting from the Company's business activities in terms of its outputs (products, services, by-products and waste) and its outcomes (internal and external consequences, whether positive or negative) across the following Six Capitals, defined by the Value Reporting Foundation: financial, manufactured, intellectual, human, natural, and social and relationship.
Public Official	Each or any of the following: <ul style="list-style-type: none"> • An official or an employee of a Government Authority, whether executive, legislative, or judicial, of a country or of a political subdivision of a country; • A person in a position of authority at a public international organization (such as the United Nations, the World Bank or the International Monetary Fund); • A person in a position of authority at a Government- Controlled Entity; • An official of a political party or a candidate for public office; • An elected or hereditary official or an employee of any governing authority representing Indigenous Peoples; or • Any other person who acts at the instruction or for the benefit of any of the above.
Site	Each and any DPM operation together with directly supporting management service companies, as well as each and any advanced exploration property or development project. The Site Head is the individual accountable for the Site.
Third Party	An individual, company, or other entity, that has an existing business relationship with the Company. Third Parties include, but are not limited to suppliers, contractors, advisors, consultants, agents, brokers, lobbyists, donation and sponsorship beneficiaries, customers, and joint venture, merger, and acquisition partners.
Workplace	Company-controlled or other premises at which Company health and safety protocols apply to any Board Member, Employee, Third Party, or other External Stakeholder visiting or working at those premises.

The terms "we" and "our" as used herein refer collectively to the Company, any Board Member, Employee, and Third Parties.



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2. Purpose and Scope

We believe that we need to define and operationalize a business strategy designed to deliver on our Company's purpose, "unlocking resources and generating value to thrive and grow together", and our strategic objective of generating a Net Positive Impact. Our business strategy is supported by a foundation of six values that inform a set of interdependent and complementary strategic objectives, that with investments of financial and non-financial capital will support our four strategic pillars – Environmental, Social and Governance ("ESG"), Innovation, Portfolio Optimization, and Growth. Generating Net Positive Impact is one of our Company's strategic objectives. For us, generating a Net Positive Impact, by setting and following through on the health and safety, environmental, and social commitments defined in this *Corporate Responsibility Policy* (this Policy) will demonstrate our "Corporate Responsibility".

This Policy applies to all Employees, Board Members and Third Parties across the Company.

3. Overarching Requirements

For us, Corporate Responsibility success is predicated on having capable, committed and motivated Employees and Board Members; having informed and engaged External Stakeholders; applying global thinking with a localized approach; applying leading international practices, wherever we do business; providing the human, financial, and technical resources to support responsible business practices; and having unquestionable ethics. Success is also dependent on having management systems that embed risk and performance management, auditing and assurance, transparent reporting, and continuous, as well as step change, improvements into every aspect and level of our business.

This Policy must be read together with DPM's *Code of Business Conduct and Ethics* and the Related Policy Documents referenced herein. Terms and acronyms defined herein and referenced in Section 1 – Defined Terms are integral to the understanding of this Policy and its Related Policy Documents.

4. Commitments

To achieve Net Positive Impact, we are committed to embedding the following objectives in our business strategy:

4.1 Health and Safety Aspects

- Striving to achieve zero harm to our Internal and External Stakeholders.
- Designing, operating and maintaining safe and healthy Workplaces.
- Continuously improving our leadership and behaviours to achieve an Interdependent Safety Culture.
- Engaging Employees and Third Parties to identify Workplace hazards and effectively managing risk through application of hierarchy of controls.



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- Developing and maintaining a fit for work and competent workforce.
- Promoting wellness to enhance physical and mental health.

4.2 Environmental Stewardship Aspects

- Optimizing our environmental footprint throughout the business life cycle.
- Ensuring the efficient use and protection of the natural physical and biotic environment.
- Controlling, reducing, and responsibly managing emissions, effluents, and waste.
- Applying a rigorous holistic approach to tailings management, in line with the Global Industry Standard on Tailings Management, that provides for the long-term safe disposal of waste.
- Building resilience into our business plans, considering the impact of climate change.
- Identifying, planning, ensuring adequate funding and delivering on our Closure obligations.

4.3 Social Aspects

- Respecting Human Rights and avoiding contributing to adverse Human Rights impacts.
- Contributing to the development of vibrant Communities and sustainable livelihoods.
- Engaging openly with Communities, Government Authorities and other External Stakeholders to build and maintain trust-based relationships.
- Collaborating to support Community health and wellness.
- Identifying and addressing the social impacts of our activities throughout the business life cycle.
- Respecting the local culture and protecting heritage resources.

Across our entire value chain, we act to understand the Company's impacts and influences and, wherever possible, apply responsible business practices to sourcing and materials stewardship.

5. Effective Date and Review of this Policy Document

The Company will review this Policy triennially and update it, when necessary, subject to approval by the DPM Board of Directors.

6. Compliance with this Policy Document

Failure to comply with this Policy may subject an Employee, Board Member or Third Party to corrective action by the Company as described in our *Code of Business Conduct and Ethics*.

7. Appendices

There are no appendices to this Policy.