



Human Rights Standard

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Version	Description of Version Changes
1.0	Initial
2.0	Revision 2022 (revised to comply with the Policy Document Management Standard, align with the revised Corporate Responsibility Policy and to provide additional clarity)
2.1	Revised (2025: company name and logo changes)

Related Policy Documents

Document Number	Document Title
GRP-PO-LEG-01 V.10	<i>Code of Business Conduct and Ethics</i>
GRP-PO-EHS-01 V.3.2	<i>Corporate Responsibility Policy</i>
GRP-PO-LEG-04 V.4.2	<i>Anti-Bribery and Anti-Corruption Policy</i>
GRP-ST-LEG-04 V.3.1	<i>Third Party Due Diligence Standard</i>
GRP-PR-LEG-07 V.5.2	<i>Speak Up 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 where indicated, individually any member(s) of the DPM Board and any member(s) of the board of directors of any of DPM's subsidiaries.
Business Unit and Business Unit Head	DPM and each of its Sites, individually. The Business Unit Head is the individual accountable for the Business Unit.
Code	The Code of Business Conduct and Ethics adopted by the DPM Board, as available on the Company's website and in the Policy Document Library at DPM Connected.
Community(ies)	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	DPM and all its directly and indirectly owned subsidiaries, collectively.
Compliance Professional	The Corporate Compliance Officer or any other member of the Legal & Compliance Function at Corporate or Site, or any other individual who has been assigned compliance accountabilities for a Business Unit by the respective Business Unit Head.
<i>Declaration on Rights of Indigenous Peoples</i>	A legally non-binding resolution passed by the United Nations in 2007 that delineates and defines the individual and collective rights of Indigenous Peoples.
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 Team	As a group, or where indicated, individually, the President & Chief Executive Officer, the Executive Vice President & Chief Financial Officer, the Executive Vice President, Corporate Development, and the Executive Vice President, Corporate Affairs, General Counsel & Corporate Secretary.
External Stakeholder	An external party (individual, company, or other entity) that can reasonably be expected to be impacted by the Company's activities or whose actions can reasonably 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, government authorities, and non-governmental organizations (NGOs).
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



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Term	Definition
	administrative authority, commission, instrumentality, official, organization, unit, body, or entity and any court, judicial or arbitral body, or other tribunal).
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.
<i>Guiding Principles on Business and Human Rights</i>	Guidelines endorsed by the United Nations Human Rights Council in June 2011 to prevent and address Human Rights abuses linked to business activity.
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.
Indigenous Peoples	Distinct social and cultural groups, identified by national or international law, regulations and/or agreements or through self-identification, that share collective ancestral ties to the lands and natural resources where they live, occupy or from which they have been displaced and can subscribe to their customary or elected leaders and organizations for representation that are distinct or separate from those of the mainstream society or culture.
Policy Document	Each or any of a Policy, Standard, Procedure or Guideline created by or for the Company or one or more of its Business Units.
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.
Security Providers	Employees or Third Parties that are directly or indirectly engaged in the Company's physical security operations.
Site and Site Head	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.
Speak-Up Report	Matters and circumstances pertaining to Misconduct or ethical concerns reported by a Company's Stakeholder or documented by a Compliance Professional.



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Term	Definition
Stakeholder	Any Employee, Board Member, or External Stakeholder.
Third Party	An individual, company, or other entity, that is interested in entering into or 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.
<i>Voluntary Principles on Security and Human Rights</i>	A set of principles that guide companies on how to conduct their security operations while respecting Human Rights, developed by the Voluntary Principles Initiative, composed of governments, key international non-governmental organizations, and companies in the industries of extracting, harvesting and developing natural resources, or energy.
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.



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2. Purpose and Scope

Respecting Human Rights, anticipating situations in which human rights impacts are most likely to occur through the activities of the Company and developing effective on-the-ground strategies to avoid or mitigate those impacts is the Company's Human Rights commitment. To meet this commitment, the Company will take reasonable steps to assess and manage its Human Rights impacts on affected Stakeholders including Employees, Third Parties, Communities, and External Stakeholders in all areas in which it operates.

The purpose of this *Human Rights Standard* (this Standard) is to articulate requirements for the Company to:

- Identify, prevent, mitigate, and be accountable for how the Company addresses its Human Rights impacts using a risk-based due diligence approach;
- Seek to prevent or mitigate adverse human rights impacts that directly or indirectly arise from DPM's operations;
- Enable the remediation of any adverse Human Rights impacts within the Company's sphere of influence; and
- Ensure all Employees, Communities, Stakeholders, Security Providers and Third Parties are aware of the Company's commitment to respect Human Rights and that the Company's business is conducted with respect for Human Rights.
- In line with the Company's Values and the principles set out in the Code, we encourage everyone to "speak-up" when they see something that could result in a violation of, or an adverse impact on, Human Rights.

This Standard applies to everyone who works for our Company, including Employees and Board Members. It also directly applies to certain Third Parties who have contractually committed to complying with our policies and standards. Regardless of contractual commitment, we expect all our Third Parties to adhere to principles that are consistent with this Standard.

3. Overarching Requirements

This Standard is informed by the principles contained in:

- The United Nations' *Universal Declaration of Human Rights*.
- The United Nations' *Guiding Principles on Business and Human Rights*.
- The United Nations' *Declaration on the Rights of Indigenous Peoples*.
- The *Voluntary Principles on Security and Human Rights*.

Consistent with applicable laws and regulatory requirements, the Company shall take reasonable steps to assess and manage Human Rights impacts on affected Stakeholders in all areas in which it operates. These



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steps may include conducting Human Rights due diligence, delivering appropriate training, and establishing mechanisms for all Stakeholders to raise related concerns with the Company.

This Standard must be read together with the Code, the *Corporate Responsibility Policy* and other related Policy Documents.

4. Performance Requirements

The Company will strive to ensure that this Standard is applied in the following areas:

4.1 Employees

The Company will take reasonable steps to ensure this Standard is applied to protect the fundamental rights of Employees. As a minimum, this will include:

- i. Providing a safe and healthy working environment in compliance with applicable laws and regulations and Policy documents;
- ii. Observing all applicable laws and regulations concerning working hours, breaks and rest periods, and ensuring that overtime is reasonable and compensated adequately;
- iii. Paying wages according to the standards set by applicable laws that, among other things, allow, at a minimum, Employees to meet their living needs and receive their wages on time;
- iv. At a minimum, ensuring access for all Employees to paid leave provisions as required by law or collective agreements; prohibiting any form of discrimination or harassment in any activity at or related to the Workplace based on race, religion, colour, gender identity or expression, sexual orientation, marital status, national or ethnic origin, indigeneity, age, disability or physical ability or any other characteristics protected by applicable laws in any country in which we operate, as set out in the Code;
- v. Respecting the rights of Employees to associate freely, form labour unions and/or worker's councils and to bargain collectively in accordance with applicable laws, and to do so without fear of reprisal, intimidation, or harassment;
- vi. Not participating or benefitting from any form of forced, bonded or exploitative contract labour, or other forms of modern slavery, which include, but are not limited to, practices such as retention of personal documents, captivity, coercion, or human trafficking; and
- vii. Adhering to applicable laws and international standards concerning minimum age requirements related to child labour and young workers.



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4.2 Communities (including Indigenous Peoples)

The Company will:

- i. Assess potential Human Rights impacts of the Company's activities on Communities;
- ii. Engage in timely and transparent consultation with Communities in advance of new projects and throughout the Company's operations;
- iii. Maintain its commitment to respecting the unique rights and cultures of Indigenous Peoples and abide by local, national and/or international agreements regarding the rights of these peoples.

4.3 Security Providers

The Company will have appropriate arrangements in place to safeguard, within its ability and sphere of influence, the security of its Employees, Communities, External Stakeholders, and assets while engaged in company business. Using a risk-based approach, and taking into account the impact of the Company's security arrangements on Communities and other Stakeholders, the Company will perform due diligence in respect of security-related Human Rights risks in line with the UN and international guidelines on security and the use of force, and depending on the degree of risk assessed, undertake the following measures:

- i. Where required, introduce specific Human Rights related clauses into contracts with Security Providers that specifically detail the Company's expectations and the contents of this Standard.
- ii. Subject to any limitations under applicable laws, screen Security Providers engaged by the Company for past Human Rights violations.
- iii. Confirm with external Security Providers that their Employees have been sufficiently trained to recognize and avoid violations of Human Rights in the conduct of their work.
- iv. Review any security related Human Rights issues and concerns with appropriate Public Officials in circumstances where some portion of the Company's security is provided by government authorities or government-owned or controlled companies.
- v. Ensure that under no circumstance should anyone, including trespassers on Company property or operations be subject to any form of violence or other forms of illegal actions.

4.4 Third Parties

The Company will:



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- i. Ensure relevant Third Parties are aware of this Standard and encourage them to communicate and apply this Standard through their respective supply chains.
- ii. Assess potential Human Rights impacts of the Third Party's activities on the Company.

4.5 Investigations and Access to Effective Remedy

The Company commits to providing a mechanism for all Stakeholders to report any known or suspected Human Rights violations, impacts, or concerns. Any reports received will be reviewed in accordance with the Company's Speak-Up Report's report handling process in a timely manner and, when needed, an independent Third Party be engaged to participate in associated investigations. As a result of an investigation, the Company will provide access to an effective remedy for substantiated human rights impacts.

4.6 Monitoring and Reporting

The Company will provide disclosure on the monitoring and reporting of this Standard in its sustainability reports in accordance with generally accepted international standards.

5. Roles and Accountabilities

To facilitate compliance with this Standard, certain roles are defined in Section 1: Defined Terms, and related relationships and accountabilities are prescribed herein.

5.1 Business Unit Head

The Business Unit Heads must:

- i. Ensure Employees, Security Providers, and other relevant Third Parties of the respective Business Unit are informed of the Company's commitment to respect Human Rights, the associated requirements and procedures, and to provide the necessary training, when required.
- ii. Facilitate and provide appropriate support and resources for Human Rights due diligence assessments.
- iii. Facilitate the "speaking up" process as set out in the Code and in the Speak-Up Standard.
- iv. Facilitate timely review of any Speak-Up Reports related to Human Rights in accordance with the Company's Speak-Up Report handling process and timely implementation of any resulting corrective actions.



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5.2 Corporate Sustainability Function Head

The Head of the Corporate Sustainability Function must:

- i. Maintain and update this Standard to reflect evolving international practices and changes in applicable laws and regulatory requirements
- ii. Arrange for effective compliance and timely performance assessments relating to this Standard. Report on compliance with this Standard to the DPM Board or its relevant committee.

6. Effective Date and Review of this Policy Document

The Company will review this Standard biennially and update it when necessary.

7. Compliance with this Policy Document

Failure to comply with this Policy will subject Board Members, Employees, and Third Parties to corrective action by the Company as described in the Code.

8. Appendices

There are no appendices to this Standard.