

# Responsible Production and Supply Policy

The Responsible Production and Supply Policy applies to all wholly-owned Sherritt's operations, its subsidiaries, and applicable contractors and 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:
  - Encourage 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 conflict-affected and high-risk areas;
  - Refrain from any action that may contribute to the financing of conflict; and
  - Comply 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 Conflict Affected and High Risk Areas (CAHRAs) as defined by the Organisation for Economic Co-operation and Development (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;
  - Child labour;
  - Other gross human rights violations and abuses such as widespread sexual violence;
  - 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, associated with artisanal or small-scale mining.
- 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 disclose such payments in accordance with Canadian Extractive Sector Transparency Measures Act (ESTMA) requirements, which align with the Extractive Industry Transparency Initiative (EITI) principles.

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