



HUMAN RIGHTS POLICY

1. INTRODUCTION

As a socially responsible global company, Capstone Mining Corp. and its subsidiaries (together, “**Capstone**”) are committed to respecting, protecting and promoting human rights of all individuals. In our business activities, we comply with applicable laws and respect international human rights standards, including without limitation the *United Nations Guiding Principles on Business and Human Rights*, the *United Nations’ Universal Declaration of Human Rights*, and the *Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises* in the extractive sector. Capstone recognizes and upholds the inherent right to dignity and worth of the human person and further recognizes that mining may create human rights abuse risks. Therefore, Capstone actively strives to avoid or mitigate any adverse impact of our activities on our employees and external stakeholders, and to engage in communications and processes to address such impacts if they occur. External stakeholders include shareholders, investors, customers, suppliers and local communities.

2. PURPOSE

The objective of this global policy is to outline Capstone’s guiding principles and standards with respect to human rights and to articulate Capstone’s expectations to its employees, directors, and contractors. Contractors include vendors, suppliers and consultants.

3. DEFINITIONS

“**Human Rights**” are internationally defined and recognized rights inherent to all human beings, regardless of race, gender, nationality, ethnicity, language, sexual orientation, religion, or any other status.

4. SCOPE

This policy applies to all Capstone employees, directors, and contractors providing services for or on behalf of Capstone.

5. INTERACTION WITH OTHER POLICIES

This policy supplements and should be read in conjunction with Capstone’s other policies applicable to our employees, directors, and contractors, including without limitation Our Values and Ethics – Code of Conduct, Respectful Workplace Policy, Diversity and Inclusion Policy, Anti-Bribery Policy, Fraud Reporting and Investigation (Whistleblower) Policy, Integrated Environmental, Health, Safety and Sustainability (EHSS) Policy, and any other site-specific policies.

6. GUIDING PRINCIPLES & STANDARDS

Capstone will:

- adhere to all applicable human rights law and regulations of countries where we operate;
- respect the principles of internationally recognized human rights;
- reflect internationally recognized human rights laws and standards in our global policies and procedures;
- apply the same standards set out in this policy to all of our sites and contractors, and expect compliance of this policy;
- not tolerate any violations of human rights committed by our employees, directors, and contractors;
- commit to fair labour practices at all of our workplaces;
- provide equal opportunities to people without regard to race, colour, gender, sexual orientation, nationality, religion, ethnic affiliation, family/friend relationships or any other characteristic protected by local law as applicable, as reflected in our [Values and Ethics \(Code of Conduct\)](#);
- provide a safe work environment that is free from violence, threats, harassment, and bullying by prohibiting all acts of unwelcome conduct or comments, verbal or written, which detrimentally affect an employee's safety and work environment, as reflected in our [Values and Ethics \(Code of Conduct\)](#) and our [Respectful Workplace Policy](#);
- continue to prioritize the health and safety of employees and contractors in the workplace and enforce rigorous risk management practices for that purpose, as reflected in our Health, Safety, Environment and Community (HSEC) policies and standards;
- not engage in the use of forced or child labour;
- respect the rights to freedom of association, freedom of speech and collective bargaining;
- recognize and respect the cultural values, beliefs and traditions of people in the countries and regions in which we operate in and the rights of indigenous peoples;
- engage in dialogue and promote the participation with affected internal and external stakeholders on human rights matters, such as integrating stakeholder engagement into project planning and operations and prioritizing engagement with the most severely affected stakeholders with emphasis on the rights of vulnerable groups that may be impacted by our activities (i.e. indigenous peoples, women and children);
- recognize water as a fundamental human right and use it responsibly and encourage the use of technologies towards reducing emissions; and
- implement initiatives and programs to address potential risks on human rights



and security where necessary, such as providing security arrangements as determined necessary, and conducting corporate and site level assessments to identify, prevent, mitigate and account for our impact on human rights and processes to enable the remediation of any adverse human rights impacts caused or contributed to by Capstone.

7. ONGOING COMMITMENT AND ASSESSMENT

Capstone is committed to provide periodic training on Capstone's human rights guiding principles and standards set out in this policy to all new employees and existing employees, directors and contractors.

Capstone will work to develop appropriate procedures to evaluate and track the effectiveness of our human rights response and measures through appropriate qualitative and quantitative indicators as well as through feedback from external stakeholders. Capstone will further strive to formalize a process to assess and audit for human rights compliance, including a process to conduct appropriate due diligence on our contractors in their human rights compliance (including compliance with this policy).

8. INVESTIGATION AND REPORTING

If a concern exists regarding human rights matters and violations, employees, directors, and contractors should follow the Complaints Procedure outlined in the [Code of Conduct](#) and report their concern in person or anonymously via Capstone's whistleblower hotline.

Employees have a duty to report violations of Capstone's policies and standard. Any employee making such a report is to be free from any concern about retaliatory consequences. Reprisals or intimidation of employees who draw attention to problems or violations will not be tolerated.

In conducting any investigation, all reasonable efforts will be made to protect an employee's anonymity. Furthermore, no employee will be adversely impacted for reasonably refusing to carry out a directive which they consider to be in violation of this policy.

All human rights breaches are collected quarterly and reported to the SVP, Operations & Exploration, SVP, Legal, Risk & Governance, and SVP, Corporate Development. Significant breaches to the Code of Conduct (including human right violations) as defined in the [Oversight of Code of Conduct Framework](#) are reported to the Corporate Governance and Nominating (CG&N) Committee on a quarterly basis.

9. NON-COMPLIANCE WITH POLICY

Capstone respects the human rights of all individuals impacted by our operations and



we treat human rights violations or other related criminal acts seriously wherever we operate.

In the case of employees, failure to comply with this policy, including without limitation omission to report human rights violations of other employees or contractors, may result in severe consequences, which could include disciplinary action up to and including termination of employment. Violation of this policy may also violate applicable laws and if it appears that an employee may have violated such laws, Capstone may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

In the case of contractors, violation of this policy may result in termination of a contract without notice, or such other measures that are available at law.

10. QUESTIONS

Should you have any questions or require any further information concerning this policy, please contact Capstone's SVP, Legal, Risk and Governance or your local HR leader.

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Authorized By:
Board of Directors