



GROUP POLICY

HUMAN RIGHTS POLICY

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INTRODUCTION

1. Purpose

Trinity Metals has the highest regard for international standards supporting the dignity and human rights of all people we associate with while conducting our business activities. We believe human rights are essential to all human beings regardless of race, nationality, sex, ethnicity, language, religion, or another status. We are particularly mindful of the risks associated with Mining activities. We are, therefore, focused on ensuring we do not tolerate any human rights abuses at our operations when dealing with our business partners and or within our supply chain practices.

2. Application

This policy applies to Trinity Metals and all affiliated companies (Trinity Metals Group). It applies to all personnel of the Trinity Metals Group, whether Directors, Employees, Consultants or Contractors, and whether working part-time or full-time on Trinity Metals business ("Trinity Metals personnel").

3. Commencement

This policy applies from September 2022.

4. Authority and Management

The Board of Directors approved this policy and will review it periodically, not less than every two years or any other time deemed necessary.

POLICY

1. Guiding Principles

To accomplish the purpose of this policy, the Company is committed to the following:

- Uphold internationally and nationally recognised human rights obligations.
- Provide environmental mitigation measures and effective remedies to mitigate any environmental consequences that impact the human rights of workers, communities, and other stakeholders.
- Engage and monitor our workforce to prevent safety incidents, labour rights violations, and discriminatory practices or harassment.
- Follow the Voluntary Principles on Security and Human Rights in our dealings with local communities to ensure their human rights are respected.
- Treat our stakeholders fairly and with respect, including respecting the history, culture and traditions of local communities, and protect their interests in land, water and the environment.
- Ensure a clear operational grievance mechanism is in place to help identify the negative impacts of our operations on communities while ensuring they have a role to play in the development of projects likely to affect them and engage with them for input and feedback on an ongoing basis.
- Provide remedies, and cooperate in government-led initiatives or other third-party mechanisms.
- Identify and prioritise any potential violations in our supply chains and take action to prevent them.
- Consider human rights risks and impacts in significant investment decisions, including acquiring new assets.
- Facilitate access to remedies in the event of any possible breach.

2. Implementation

To fulfil the commitments set out above, we will:

- Provide a safe and healthy workplace for our staff.
- Foster an environment that promotes diversity and inclusion.
- Employ individuals above the minimum employment age set by the labour law in Rwanda and in line with International Labour Standards on child labour (we will not, in any circumstance, employ anyone under 18, the legal minimum employment age).
- Communicate this Policy internally and externally to help ensure our stakeholders, including the communities in which we operate, understand our human rights responsibilities and commitments.
- Provide training on Voluntary Principles on Security and Human Rights for senior corporate leadership and operations management, including first-level supervisors and others in higher-risk job functions such as security personnel.
- Establish and maintain meaningful and transparent relationships with local communities grounded in mutual respect and trust.
- Seek out opportunities to support and promote actions that ensure human rights for our stakeholders and communities are upheld.
- Regularly review our performance, and that of our key business partners, on human rights matters relative to our policies and standards to enable continuous improvement in our human rights management and performance.
- Prevent, mitigate, and, where appropriate, remedy any human rights impact that the Trinity group may have caused or contributed to. Should we be directly linked to any adverse human rights impacts because of activities in our value chain, we will work to use eliminate or mitigate those impacts.
- Take appropriate action where we identify violations of this Policy by employees or business partners, including termination of employment or contract and referral to the relevant authorities.
- Publicly communicate our human rights management approach and performance in our annual reporting.

3. Reporting

Any employee concerned regarding human rights abuse or potential abuse is encouraged to report the matter internally. Concerns must be communicated to the Human Resources Department or Legal Counsel for prompt remedy. The issue should be escalated to the Chief Executive Officer if no remedy is provided. The Company will not seek reprisal against an employee, a director, a contractor or any other person for reporting, in good faith, an abuse or potential abuse of human rights. Any person intimidating or imposing sanctions on any employee, a contractor or another person for reporting a matter in good faith will face disciplinary action under the Company Disciplinary Code.

4. Administration

The Group Legal Counsel, under the oversight of the Chief Executive Officer, is responsible for developing and administering this policy and any programs concerning Human Rights matters.