



**ACLARA RESOURCES INC.  
HUMAN RIGHTS POLICY**

Aclara Resources Inc. (“**Aclara**” or the “**Company**”) is committed to the protection universal human rights through the promotion and compliance with the laws, regulations and social codes of the countries and jurisdictions in which we operate. Aclara respects the rights, cultures, customs and values of the people and communities who live near our projects, our employees, and any other person impacted by our corporate actions.

This Policy is applicable to the entire workforce of the Company and its subsidiaries, including senior management and officers, contractors, consultants and the board of directors of the Company.

**GUIDING PRINCIPLES OF OUR POLICY**

Aclara believes upholding universal human rights and strongly condemning any violation of the such is imperative to the sustainable development of resource-based projects. Through a comprehensive set of operational policies and procedures, Aclara seeks to deliver economic, social and environmental benefits to all its stakeholders, including those who live and work in the communities in which we operate. The Policy is based on the following objectives:

1. Zero toleration of any violation of human rights by our employees, affiliates or any third parties contractually or otherwise acting on our behalf or related to any aspect of our business operations;
2. Belief in equitable employment practices and a workplace which respects and promotes diversity and inclusion, including zero toleration of any discrimination against individuals on the basis of race, colour, gender, religion, sexual orientation, age, nationality or social origin, or union membership;
3. Denunciation of any and all forms of forced, compulsory and child labour and shall actively work to seek, identify and prevent them in any of our spheres of influence or value chain;
4. Respect for freedom of expression and association, including the right to establish and join organizations such as unions or other groups which bargain collectively and advance group occupational interests without any unreasonable interference; and
5. Participation in international industry human rights initiatives.

**COMMITMENT TO OUR HUMAN RIGHTS POLICY**

To fulfill and exceed our commitment to our Policy and the broader promotion of universal human rights, Aclara will:

1. Regularly evaluating and monitoring our human rights performance and taking active steps to mitigate any potential violations at all levels of the Company;

2. Develop and implement supporting policies, procedures, training and internal reporting structures to embed this Policy throughout our company;
3. Measuring and reporting our performance transparently against objective targets and goals;
4. Maintain a robust, confidential reporting system for the reporting and investigation of allegations of human rights abuses through our Whistleblower Policy;
5. Respect the history, culture and traditional ways of indigenous peoples, their standing as distinct, self-determining peoples with collective rights, and their interests in land, waters and the environment;
6. Integrate human rights into our risk management assessment tools and due diligence processes; and
7. Communicate this policy to our employees, partners, contractors, sub-contractors, local communities and other stakeholders affected by our operations, and make it available to the public.

This Policy should be read in conjunction with more complete policy statements and codes, such as our Code of Business Conduct and Ethics, and such other guidance notes which Aclara may issue from time to time.

Dated: January 31, 2022

Approved by: Board of Directors of the Company