



# Health, Safety, Environmental, Sustainability and Social Responsibility Policy

Approved: March 24, 2022

## INTRODUCTION

The Board of Directors (the “**Board**”) of Giyani Metals Corp. and all its subsidiaries (the “**Company**”) has determined that the Company should formalize its policy on matters relating to Health, Safety, Environmental, Sustainability and Social Responsibility (the “**Policy**”).

## OBJECTIVE OF THE POLICY

The objective of this Policy is to outline how the Company, together with its directors, officers, employees, consultants and contractors (and their sub-contractors), will conduct its business in a safe and environmentally friendly manner and to the highest standards of corporate social responsibility.

## APPLICATION OF THE POLICY

This Policy is applicable to all directors, officers, employees, consultants and contractors (and their sub-contractors) of the Company.

## COMMUNICATION OF THE POLICY

To ensure that all directors, officers, employees, consultants and contractors (and their sub-contractors) of the Company are aware of its contents, a copy of this Policy will be provided to each of them upon their appointment and periodically thereafter. Alternatively, they will be advised that this Policy is available on the Company’s website for their review. Each such person will (i) agree, in writing, to be bound by this Policy upon such provision or notification; (ii) be informed whenever significant changes are made to this Policy; and (iii) as appropriate, be educated about its importance.

## COMPLIANCE

All directors, officers, employees, consultants and contractors (and their sub-contractors), in discharging their duties on behalf of the Company, will comply with the laws, regulations and rules of the location in which the Company is performing business activities. In particular, this refers to safety and environmental laws, rules, regulations and standards. Where uncertainty or ambiguity exists, competent professional advice must be obtained (e.g., from the authorities or legal counsel).

All directors, officers, employees, consultants and contractors (and their sub-contractors) of the Company, as the Board or its delegates may decide, will provide certification of compliance with this Policy on request by, and in a form acceptable to, the Company.

## VISION FOR SUSTAINABLE DEVELOPMENT

The Company aims at sustainable<sup>1</sup> development through:

---

<sup>1</sup> Sustainability means meeting the Company’s own needs without compromising the ability of future generations to meet theirs (United Nations Brundtland Commission, 1987). Sustainability comprises three pillars (i.e., social, economic and environmental).

- a) ingraining the Company's vision for a safe, environmentally-friendly and socially responsible culture into the organisation and that of the Company's consultants and contractors (and their sub-contractors);
- b) effective management of the Company's activities to minimize environmental impacts and enhance positive impacts while striving for sustainability and carbon neutrality;
- c) support for local employment and entrepreneurship; and
- d) support for the development of infrastructure, health, education, training and cultural activities in collaboration with the community.

The Company will strive to contribute to a healthier, safer, sustainable and more prosperous community in the areas where it operates.

### **SUSTAINABLE DEVELOPMENT POLICY**

The Company is committed to responsible mining, carbon neutrality and sustainable development.

The Company strives to achieve or exceed leading industry practice whilst operating in compliance with host-country legislation and conformance with international standards in terms of the social, biophysical and economic environments.

Every effort will be made to make this Policy a reality, embraced by each director, officer, employee, consultant and contractor (and their sub-contractors) of the Company.

To achieve this, the Company commits to transparency, honesty, accountability, integrity and legality in all aspects of the Company's corporate governance and in the Company's dealings with all stakeholders, including government, the community, employees, consultants, contractors (and their sub-contractors), service providers and shareholders. Should active development of any of the Company's projects come to fruition, the Company will:

- a) adhere to, and, where applicable, adopt good international industry practice for social responsibility; this includes taking responsibility for the impact of the Company's activities on society and the environment, and behaving in a responsible and ethical manner at all times;
- b) respect the human rights, culture, customs and values of the Company's host communities;
- c) identify, assess, manage and mitigate risks to the Company's host communities and the environment;
- d) seek to improve the Company's environmental performance on a continual basis, that exceeds legal requirements;
- e) strive to achieve a carbon neutral footprint;
- f) develop and implement an environmental and social management system as an umbrella tool that integrates health, safety, environmental and social plans, procedures, reporting structures, and roles/responsibilities;
- g) conduct comprehensive monitoring programmes and audits to assess performance, compliance with all relevant legislation, and conformance with guidelines, and standards;
- h) promote and implement the efficient use of resources, and implement the waste hierarchy (avoid, minimise, reuse and recycle);
- i) develop an employment policy that gives priority to local workers who are qualified for roles and provide training and education to candidates in line with the needs of the Company;

- j) facilitate capacity building of local small and medium enterprises (SMEs) for the provision of goods and services to the Company's projects;
- k) allocate sufficient financial resources to meet all the Company's commitments, including those extending beyond mine closure; and
- l) participate proactively with local authorities and host communities for post-mining planning.

## **ENVIRONMENTAL POLICY**

The Company acknowledges that sustainability of its activities depends on good management in terms of environmental protection.

Should the Company engage in the active development of any of its projects (present and future), the Company will:

- a) integrate environmental considerations into all aspects of the Company's activities;
- b) establish and maintain management systems that can identify, monitor, control and improve the environmental performance of the Company;
- c) implement periodic independent evaluation of its environmental performances compared to the Company's objectives and goals;
- d) once in receipt of any environmental permit, draft a yearly report on environment performance, which will be produced in addition to, and at the time of, the annual financial statements of the Company;
- e) observe all the laws and applicable regulations in host countries, and other standards that the Company adopts;
- f) adopt good international industry practices for all the Company's activities;
- g) ensure the existence of sufficient financial resources, or access to them, to fulfill all of the Company's environmental obligations and commitments, including rehabilitation;
- h) ensure that all directors, officers, employees, consultants and contractors (and their sub-contractors) understand the Company's policies and fulfill their responsibilities for environment protection; and
- i) implement efficient and transparent communication strategies in order to encourage dialogue with interested and affected parties regarding the environmental aspects of the Company's activities.

## **OCCUPATIONAL HEALTH AND SAFETY POLICY**

The Company is committed to providing and maintaining a safe and healthy working environment where all directors, officers, employees, consultants and contractors (and their sub-contractors) conduct themselves in a responsible and safe manner.

The Company is committed to working to a high standard of Occupational Health and Safety ("OHS") through implementation of policies, procedures, standards, setting targets and monitoring performance.

The Company's philosophy is that all accidents and injuries are preventable. To achieve a zero-accident culture the Company will:

- a) identify and manage the Company's key health and safety risks;
- b) comply with all applicable laws, regulations and align with OHS good international industry practice;

- c) integrate management of health and safety strategies into the Company's key business and planning processes;
- d) provide employees with the training and resources required to minimize the OHS risks of their work activities;
- e) require that contractors (and their sub-contractors) provide their employees and service providers with the training and resources required to minimize the OHS risks of their work activities;
- f) encourage and support employees and contractors (and their sub-contractors) to promote initiatives to reduce OHS risks associated with their activities for the Company;
- g) provide adequate emergency response resources, emergency exercises and related training;
- h) ensure that work / access permit systems are diligently and correctly used by all staff and contractors;
- i) ensure that all new employees, contractors and their sub-contractors, and visitors are appropriately informed of the Company's OHS policies, procedures and requirements through induction prior to access to the Company's sites;
- j) achieve and maintain high levels of workplace hygiene at all times; and
- k) review, as appropriate, Company's health and safety management systems and performance.