

Human Rights Policy

Approved: March 24, 2022

PURPOSE

Giyani Metals Corp. (the “**Company**” or “**Giyani**”) is focused on respecting human rights and delivering responsibly sourced manganese products, while supporting local governments to protect human rights and prevent human rights abuses. The purpose of this policy is to articulate Giyani’s human rights commitments, the Company’s expectation of its employees, officers, directors, consultants, contractors or any third-party consultant or contractor conducting work at its operations (“**Employees**”), and the Company’s commitment to engage with stakeholders affected by its operations.

The Company is committed to regularly reviewing and assessing the effective implementation of and compliance with this policy. To this end, the Company will ensure relevant corporate procedures, standards and guidance support the implementation of and are aligned with this policy, in particular the Company’s Health, Safety, Environmental, Sustainability and Social Responsibility Policy, as well as the Code of Business Conduct and Ethics.

SCOPE AND RESPONSIBILITY

This Human Rights Policy (the “**Policy**”) applies to the Company and its Employees. The Company and Employees will behave in a manner that respects human rights and avoids infringing upon them. The Company will take appropriate measures to ensure that this policy is respected. For employees, non-compliance with this policy may be grounds for disciplinary action up to and including termination of employment. For consultants and contractors, non-compliance may be grounds for contract termination.

To meet our responsibilities to respect human rights, the Company is committed to:

- a) Respecting human rights as defined in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. The Company will seek to conduct business in a manner that does not cause, and is not complicit in, human rights abuses either directly or through its business relationships.
- b) Respecting the rights of the Company’s workforce, local community members and all stakeholders with whom the Company interacts. Giyani expects all business partners, contractors and consultants including any needed security providers to share this commitment to rights, including those in regard to working conditions, freedom of association, freedom of speech, maximum working hours, fair wages and benefits, equal opportunity and freedom from discrimination.
- c) Regularly reviewing changing conditions in the jurisdictions where the Company operates and conducting impact assessments and due diligence to identify human rights risks associated with the Company’s activities with the intention of preventing and mitigating adverse impacts.
- d) Not discriminating against any individual based on race, gender, identity, religion, age, social status, sexual orientation, disability or any other characteristic unrelated to the individual’s work performance.
- e) Not tolerating disrespectful or inappropriate behaviour, harassment, intimidation or unfair treatment, or retaliation of any kind by Employees or those of the Company’s suppliers and business partners.
- f) Respecting the human rights of individuals who require particular attention, including women, children, Indigenous peoples and other potentially vulnerable or marginalized groups.

- g) Prohibiting child labour, forced labour and modern slavery in the Company's operations and in the Company's supply chains, and supporting the elimination of all forms of child and forced labour.
- h) Where the Company hires private security forces to protect Employees, partners, resources, and property, such contractors must comply with local and international law.
- i) Not causing, supporting, benefiting from or contributing to unlawful armed conflict, human rights abuses or breaches of international humanitarian law.
- j) The Company will identify and monitor human rights impact indicators, allowing for continual improvement of its human rights standards and practices.
- k) The Company will take actions to embed a human rights culture in the Company and ensure Employees are made aware of this Policy and understand their responsibility to comply. These measures include awareness-raising and training on the Policy and specific aspects within it, such as how to report concerns related to human rights via the Company reporting violations as defined below.
- l) The Company will take measures to avoid or minimize involuntary resettlement wherever possible. When relocation cannot be avoided, the Company will establish, in consultation with affected communities and the corresponding governmental agencies, a resettlement and relocation action plan that adheres to guidelines established by the International Council on Mining and Metals and the International Finance Corporation Performance Standards.

COMMUNICATION OF POLICY; ANNUAL CERTIFICATION

All Employees will be provided a copy of the Policy and any amendments and/or be advised that it is available on the Company's website. Explanation of this Policy will form a part of the induction process for all new Employees.

As requested by the Board, all Employees will be required to provide an annual certification of compliance with this Policy.

The CEO will be responsible for ensuring that all annual certifications requested by the Board are obtained annually and for providing written confirmation to the Board that such certifications have been obtained and summarizing the results thereof.



REPORTING VIOLATIONS OF THE POLICY

The Company has established a whistleblowing hotline to allow for the confidential reporting of discrimination or harassment. Persons wishing to make complaints or report concerns on a confidential basis are encouraged to use the following contact below:

Tel: +1 (713) 899-3399

Email: giyani.whistleblower@gmail.com

Postal Address: **Giyani Metals Corp.**
c/o Stikeman Elliott LLP
Suite 1700
666 Burrard Street
Vancouver, British Columbia V6C 2X8
Canada

Attention: Mr. John Petersen

"Private and Confidential"

 info@giyanimetals.com

 giyanimetals.com
