



DYNACOR GROUP INC.
HUMAN RIGHTS POLICY
(UPDATED JANUARY 2022)

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1. INTRODUCTION

Since 2022, Dynacor Gold Mines, hereinafter referred to as Dynacor, and its subsidiaries, have adopted a policy dedicated to the respect of human rights, which strengthens and deepens the commitments already established by the Code of Conduct.

We respect the human rights of all stakeholders affected by our operations, including suppliers of inputs and services, mineral suppliers (ASMs), employees, local communities and other stakeholders.

We have adopted the “Protect, Respect and Remedy” approach of the United Nations Guiding Principles on Business and Human Rights, as well as the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. We are also committed to adopting a human rights due diligence approach across our entire value chain.

This policy identifies 12 human rights commitments and we are committed to defining action plans for each of them. In addition, all external and internal stakeholders can report any violation or alleged violation of our human rights policy through the channels indicated in this policy.

2. OBJECTIVE

To establish the commitments to be followed by Dynacor and its subsidiaries regarding respect for human rights, seeking to act in such a way that we do not generate situations that put human rights at risk, either through our operations or because of our relationships with suppliers of inputs and services, contractors, mineral suppliers (ASMs), employees, local communities or other people that may be impacted by our activities.

3. SCOPE

Dynacor’s employees and subsidiaries, including strategic partners such as suppliers of inputs and services, contractors and mineral suppliers (ASMs).

4. INTERNATIONAL REFERENCES

This policy includes respect for internationally recognized instruments and standards:

- The International Bill of Human Rights of the United Nations (UN):
 - Universal Declaration of Human Rights.
 - International Covenant on Civil and Political Rights.
 - International Covenant on Economic, Social and Cultural Rights.
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.
- The “United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations Framework to Protect, Respect and Remedy”.
- The Declaration on Fundamental Principles and Rights at Work of the International Labor Organization.
- The United Nations Convention on the Rights of the Child.

5. INTERNAL REFERENCES

- Code of conduct.
- Internal work regulations.
- Internal occupational health and safety regulations.
- Occupational health and safety policy.
- Environmental policy.
- Handbook for the prevention and detection of money laundering and financing of terrorism.

6. COMMITMENTS TO HUMAN RIGHTS

Based on international human rights standards, our materiality process and dialogue with our stakeholders, we have established the following 11 human rights commitments related to our operations and relationships with our business partners:

1. **Rejection of forced or compulsory labour:** We do not tolerate the use of any form of forced or compulsory labour, and we reject any form of slavery and human trafficking. We recognize the right of every person to work and to freely choose their own employment. Likewise, we do not retain money or documents of any kind that may infringe on employees' freedom of movement.
2. **Zero tolerance for child labour:** We reject the use of child labour. Therefore, the minimum age to work at Dynacor and its subsidiaries is 18 years old, in compliance with current legislation. Likewise, considering that children and adolescents are vulnerable groups, no person under 18 years of age may join our operations.
3. **Equal opportunities and rejection of any type of discrimination:** We are committed to promoting equal opportunities and maintaining a workplace where people are treated fairly, respecting their individuality and the right to receive equal pay for work of equal value. No person shall be discriminated against in relation to age, nationality, gender, disability, religion, sexual orientation, political choice or any other status.

We reject any type of verbal, physical, sexual or psychological harassment.

4. **Freedom of association and collective bargaining:** We respect the right of our employees to form or participate in organizations that seek to defend and promote their interests. Likewise, we respect the legitimate option to be represented by unions or other legally established forms of representation.
5. **Freedom of thought and political participation:** We respect the right of every person to freedom of thought, being able to freely express their ideas, beliefs or religion, individually or collectively. Likewise, we respect the right of people to participate in the government of their country directly or indirectly through their representatives.
6. **Health, safety and welfare:** We are committed to providing a safe working environment for our employees, suppliers and contractors. Through our occupational health and safety program, we identify, assess, and control occupational health and safety risks to achieve a safe workplace, as well as ongoing training. We also seek to

provide adequate living and recreational conditions for our personnel, suppliers, and contractors during their work at our facilities.

7. **Fair and favourable working conditions:** All persons working at our facilities are entitled to fair and equitable compensation that ensures a life in accordance with human dignity. The minimum compensation cannot be less than the minimum wage established in the employment contracts and the legislation in force. Each person who works with us, throughout the entire value chain has the right to conditions that respect his or her health, safety, well-being and dignity, maximum working hours and rest periods.
8. **Sustainable supply chain:** We are committed to ensuring that our suppliers and contractors adopt best practices in human rights (including working hours, child labour, discrimination, forced labour, occupational health and safety, freedom of association and collective bargaining, environmental responsibility, among others). We are also committed to safeguarding the security of our operations and personnel in an environment that promotes respect for human rights through our relationships with our private security providers.
9. **Environmental impacts:** We are committed to managing our impacts on the environment (including impacts on water, soil, air and climate change) in order to protect the lives and health of our personnel, communities, suppliers of inputs and services, mineral suppliers (ASMs) and other stakeholders.
10. **Respecting the rights of local communities:** We are committed to respecting the rights of local communities, prioritizing those potentially impacted by our operations and our business relationships, as well as contributing to their economic and social growth (including local labour, local procurement, and social investment). This commitment also extends to our mineral suppliers (ASMs), with whom we also contribute to the socioeconomic development of the communities where they operate.
11. **Protection of areas of high conservation value:** We promote the conservation of biological diversity, natural ecosystems, Natural Protected Areas and indigenous peoples in their place of origin, within the scope of our operations.
12. **Responsible communication:** As an essential part of this policy, we are committed to ensuring responsible, non-discriminatory communication that respects the different cultures of our stakeholders.

7. TRAINING

We are committed to communicating this policy to internal and external stakeholders, including general awareness and specific training on human rights challenges, when deemed necessary.

8. COMPLAINTS CHANNEL

Dynacor's and its subsidiaries' stakeholders who consider that a violation has been committed, or that it could constitute an actual or potential violation of this Human Rights Policy, should contact:

- Ethics Channel Email: linea-etica@dynacor.com.pe
- Ethics Hotline: (511) 650-0318
- Via Web: www.dynacor.com/lineaetica
- By writing to: **Dynacor Ethics Line**
 - Minera Veta Dorada:
Raymundo Morales de la Torre 144
San Isidro, Lima
Peru
 - Dynacor Gold Mines:
Head Office
625 René-Lévesque Blvd. West, Suite 1200
Montreal, Quebec H3B 1R2
Canada

Employees or other stakeholders of Dynacor or its subsidiaries who file a complaint or speak openly about conduct that violates the commitments of this Human Rights Policy are protected against any retaliation by Dynacor or its subsidiaries' officers. In particular, this includes the application of penalties, termination or dismissal, as well as acts that may be considered hostile.

9. RESPONSIBLE PARTIES

CEO of Dynacor Gold Mines

- Commits to the respect of human rights at Dynacor and its subsidiaries by signing the Human Rights Policy.
- Communicates the importance of this Human Rights policy to Dynacor and all its subsidiaries.

Ethics Committee

The Ethics Committee is a forum in which the moral issues that most affect the company are discussed. Among its functions, it will be responsible for receiving and investigating complaints of non-compliance with the Human Rights Policy. It is composed of the Compliance Officer, the Human Resources Department, Sustainable Development Management and the Director of Corporate Communications.

Compliance Officer

- Responsible for receiving reports of violations of this Human Rights Policy from the aforementioned reporting mechanisms.
- Provides periodic reports on allegations of violations of this Human Rights Policy to the Ethics Committee.

Corporate Communications Director

- Leads Ethics Committee to resolve allegations of non-compliance with this Human Rights Policy.
- Provides periodic reports on stakeholder complaints or grievances related to human rights that have been evaluated by the Ethics Committee.
- Coordinates the human rights action plan in line with the commitments of this Human Rights Policy and the ongoing human rights due diligence process.
- Promotes compliance in the management of Dynacor Gold Mines and all its subsidiaries.

Sustainable Development Management

- Ensure compliance with this policy and its commitments through human rights advice and training to the various company departments.
- Responsible for identifying, managing and advising on the control of risks associated with human rights.
- Compiles the various human rights actions of Dynacor and subsidiaries.
- Coordinates human rights training for Dynacor Gold Mines management and all its subsidiaries.
- This policy will be supervised by the Sustainable Development Management.

10. CONSEQUENCES OF NON-COMPLIANCE

The contracts of employees, ASMs, contractors and suppliers include a commitment to respect Dynacor's Human Rights Policy. While working for, or on behalf of, Dynacor or its subsidiaries, all individuals will be held accountable for their behaviour and Dynacor will take action when this Human Rights Policy is not complied with. These sanctions may range from a warning, to dismissal or cancellation of the contract for goods or services.



Jean Martineau

President and Chief Executive Officer of Dynacor Gold Mines Inc.