



**DYNACOR GROUP INC.**  
**SUSTAINABILITY POLICY**  
(UPDATED OCTOBER 2024)

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## **1. INTRODUCTION**

At Dynacor Group, hereinafter referred to as Dynacor, and its subsidiaries, we are committed to meeting international environmental, social and governance standards as well as the standards of all countries in which we operate. We recognize that to become leaders in the sustainable processing of gold ore, we must establish concrete, measurable commitments that are integrated into the decision-making process. As a result, we will generate greater value for our stakeholders, maintain our social license to operate and contribute positively to our local communities while strengthening ethical business management and respect for the environment.

For these reasons, we have adopted a Sustainability Policy that is aligned with the United Nations Sustainable Development Goals and which, since January 1, 2023, has been in the process of being developed and implemented. This policy also supports the commitments made in our Sustainability Statement, which requires us to adhere to environmental, social and corporate governance (“ESG”) practices throughout our entire operations.

In this policy, we have established 11 commitments, which will be managed through action plans:

## **2. OBJECTIVE AND SCOPE**

To formalize our commitments and areas of focus in the management of our business to ensure the processing of gold ore according to responsible governance, environmental and social standards, while maintaining trustworthy and transparent relationships with our stakeholders.

This policy applies to all relationships between Dynacor and its subsidiaries with its employees, suppliers of inputs and services, mineral suppliers (ASM), local communities, customers, national, regional, and local governments, civil society, and other internal and external stakeholders. It is also applicable to all sites where we operate and covers all stages of our production process, including design, construction, operation and closure.

## **3. INTERNATIONAL REFERENCES**

This policy includes adherence to internationally recognized initiatives and standards:

- United Nations Global Compact<sup>1</sup>
- Sustainable Development Goals (SDGs)
- Global Reporting Initiative (GRI) International Standards
- International Cyanide Management Code
- Universal Declaration of Human Rights
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

## **4. INTERNAL REFERENCES**

- Code of Conduct
- Dynacor Sustainability Statement
- Human Rights Policy

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<sup>1</sup> Dynacor is not a direct participant in the Global Compact, but we still consider it important to reference this global UN initiative.

- Occupational Health and Safety Policy
- Environmental Policy
- Manual for the Prevention of Money Laundering and Terrorism Financing

## **5. FUNDAMENTAL PRINCIPLES AND COMMITMENTS**

We have established 11 commitments that will guide our sustainability actions in all our activities and relationships with stakeholders.

Our intention is to promote a transparent and accessible dialogue with the aim of understanding the needs of our stakeholders and ensuring that these are considered in the development of our activities, thus establishing long-term sustainable relationships based on mutual understanding, effective collaboration and language suited to each stakeholder group.

These commitments are the result of a due diligence process and should be applied to promote the positive impacts of our operations and to prevent their negative impacts.

### **1. Ethics and Compliance**

We are committed to maintaining ethical behaviour as outlined by our Code of Conduct in all our operations and interactions with our stakeholders, as well as complying with applicable national and international legislation.

### **2. Human Rights**

We recognize and respect the dignity, welfare and human rights of all interest groups who are impacted by our operations, including suppliers of mineral ore and services, ASM suppliers, workers, local communities and other interest groups.

### **3. Health and Safety**

We are committed to implementing measures aimed at preventing and, when necessary, mitigating the exposure of our employees and contractors to health and safety risks. This commitment includes promoting ongoing training, access to healthcare services, and providing psychological and social support to preserve well-being and work capacity.

### **4. Responsible Environmental Management**

We are committed to promoting environmental preservation, managing our environmental impacts and the responsible use of natural resources through environmental management plans. We encourage good environmental practices among our suppliers including our ASMs, communities and business partners to develop a culture of responsibility.

### **5. Responsible Supply Chain**

We are committed to fostering environmental, social and human rights as well as safety practices by managing our relationships with suppliers including ASMs, customers and business partners in a way that ensures responsible sourcing and management practices for minerals, goods and services.

Our commitment involves being recognized as a responsible gold processor that promotes strong operational performance throughout the value chain.

### **6. Responsible Artisanal and Small-Scale Mining**

As part of our management of ASM suppliers, we consider it essential to commit to ensuring the supply of traceable gold ores and to positively influence formal and transitioning miners to improve in their operations.

## **7. Positive Relationships with Communities**

We are committed to creating value for our local communities by integrating social components into decision-making. Our goal is to foster a collaborative environment among government, communities and civil society. We aim to significantly improve the quality of life, reduce inequality and enhance the well-being of people in the areas where we operate, thus ensuring the sustainable development of our current and future activities.

We are committed to allocating an average of 1% of our annual profits after taxes to finance initiatives that benefit the countries and communities within our areas of influence, thereby promoting infrastructure development and educational opportunities. This will help improve the quality of life in these communities and build productive, healthy and transparent relationships based on mutual respect and trust.

## **8. Partnerships**

We firmly believe in collaborating with multiple stakeholders and work with them to towards the goals of sustainable development. For this reason, we are committed to seeking opportunities to establish partnerships that will allow us to carry out sustainability projects and ensure their long-term viability.

## **9. Transparency and Disclosure**

We constantly strive to act with transparency and accountability by reporting on our actions and commitments to our stakeholders through our annual ESG report.

## **10. Active and Responsible Communication**

We are committed to maintaining active communications with our employees, suppliers, ASM suppliers, business partners, communities and any other stakeholder groups, keeping channels of communication open at all times.

## **11. Continuous Improvement**

We continuously seek to improve sustainability management indicators of our processes, due diligence, monitoring of set objectives, measurement of results and implementation of necessary improvement measures.

## **6. RESPONSIBILITY AND ACCOUNTABILITY**

### **CEO of Dynacor Group**

- Recognizes, respects and adheres to the sustainability commitments of Dynacor and its subsidiaries through the signing of the Sustainability Policy.
- Communicates the importance of the Sustainability Policy to Dynacor and all its subsidiaries.

### **Environmental and Social Responsibility Committee**

- Oversees sustainability strategies, policies and practices to achieve Dynacor's objectives as well as those of its subsidiaries.
- Provides advice on the implementation of the commitments set out in the Sustainability Policy.
- Reports to the Board of Directors on the environmental and social performance of Dynacor and its subsidiaries.

### **ESG Technical Committee**

- Leads the preparation of the annual ESG Report published by Dynacor.

- Provides advice on environmental and social actions and projects for Dynacor and its subsidiaries.

#### **Sustainability Department**

- Conducts ongoing monitoring and evaluation of compliance with the Sustainability Policy and commitments contained therein through advising and training various departments within the company.
- The supervision of this policy will be the responsibility of the Sustainability Department.

### **7. COMMUNICATION AND DISCLOSURE**

We are committed to providing this policy to all internal and external stakeholders of Dynacor and its subsidiaries.

We are dedicated to including this policy in the training and orientation processes for all employees at the beginning of their employment. Additionally, the policy will be specifically mentioned when necessary in particular cases.

**Jean Martineau**

**President and Chief Executive Officer of Dynacor Group Inc.**