



## **HUMAN RIGHTS POLICY**

**EFFECTIVE: JANUARY 1, 2023**

**LAST REVIEWED: FEBRUARY 12, 2026**

### **I. Statement of Purpose**

The purpose of this document (the “**Policy**”) is to define the policy of Sun Peak Metals Corp. and its affiliates (collectively “**Sun Peak**”) with regards to human rights.

Sun Peak’s approach to human rights, as set out in this Policy is guided by the principles articulated through instruments of international law, such as the United Nations’ International Bill of Human Rights, as well as industry standards and best practices, such as the OECD Guidelines for Multinational Enterprises.

This Policy may be supplemented by other sector-specific policies.

### **II. Scope**

This Policy applies to Sun Peak and all of its affiliates. It applies to all Sun Peak personnel, including senior management, directors and officers. It is intended to apply to all Sun Peak operations and business relationships.

### **III. Definition**

“**Human rights**” refers to fundamental rights and freedoms to which all human beings are entitled, as identified in the International Bill of Human Rights and other generally recognized instruments of international law.

Significant human rights include:

- Life, health and safety;
- Liberty and protection from slavery;
- Equality and protection from discrimination;
- Freedom of association;
- Free choice of employment; and
- Adequate standard of living.

### **IV. Human Rights Standards**

Sun Peak respects the human rights of all persons involved in or impacted by its operations. This includes Sun Peak employees, third party business partners, and members of local communities where Sun Peak conducts its operations.

Without limiting the generality of the foregoing, in order to achieve this goal, Sun Peak shall :



- Conduct thorough human rights due diligence to assess, minimize and manage potential human rights impact of its activities;
- Have in place procedures and mechanisms for the monitoring of human rights impacts and the reporting of human rights violations by anyone without fear of retaliation;
- Ensure that, if adverse human rights impacts are identified, they are promptly minimized and remedied;
- Ensure that all worker rights are respected, and that no forms of modern slavery, forced or child labour are tolerated within the scope of its activities;
- Engage with local stakeholders in order to identify potential human rights issues, as well as , gain and maintain support for its activities whenever such activities have local impacts;
- Ensure that its activities are conducted with respect for local cultures, traditions and customs; and
- Support social and economic development initiatives through engagement with local communities and local employment or sourcing.

Sun Peak does not tolerate violations of human rights in any way, shape, or form, whether these violations are committed by Sun Peak personnel or third parties.

Without limiting the generality of the foregoing, Sun Peak shall not engage in, be complicit in, or tolerate:

- Any form of forced labour, child labour, or servitude;
- Discrimination or harassment on any basis; or
- Violence, threats, or intimidation in any form.

When this Policy and local law conflict on matters of human rights, the stricter standard shall prevail.

## **V. Business Partners**

Sun Peak’s commitment to human rights extends to all third party partners with whom it chooses to do business. Sun Peak expects all third party business partners to adhere to the same high standards, and will not initiate or maintain relationships with those who do not share this commitment.

To achieve this, Sun Peak will:

- Engage in thorough vetting of its business partners to identify any potential human rights issues;
- Refuse to contract with potential partners with a history of human rights violations;
- Provide business partners with training and guidance on human rights as needed; and
- Include in all contracts with third party partners strict provisions requiring adherence to the same human right standards as Sun Peak.

## **VI. Deviations**



No deviations or exceptions to this Policy are permitted.

## **VII. Expectations**

Sun Peak personnel, regardless of position or seniority, is expected to fully familiarize themselves with this Policy, undergo all mandatory training in relation thereto, and act in accordance with the principles stated therein at all times.

In accordance with Sun Peak's policy of zero-tolerance, employees are also required to report any incident of human rights violations or any similar behavior of which they become aware.

Failure to act in accordance with this Policy or to report a human rights violation will result in severe disciplinary measures, up to and including termination.

Adopted by the Board of Directors of Sun Peak Metals Corp. on March 2, 2023.