



HUMAN RIGHTS POLICY

INTRODUCTION

Aya Gold & Silver Inc. ("Aya") is committed to upholding human rights and ensuring compliance with applicable laws and regulations in all countries where we operate. This Human Rights Policy outlines our commitment to respecting and promoting human rights within our organization and in our interactions with stakeholders. It applies to our directors, officers, and employees, as well as third parties acting on behalf of or representing Aya, including contractors, sub-contractors, consultants, suppliers, intermediaries, agents, and other business partners. Adherence to human rights is an essential obligation for all individuals affiliated with our organization. We expect our partners to demonstrate a strong commitment to upholding human rights and responsible practices.

COMMITMENTS & APPLICABLE STANDARDS

We are guided by the following commitments and standards of conduct:

- 1. Compliance:** Aya is committed to complying with all applicable national and international laws, rules, and regulations regarding human rights. We uphold internationally recognized human rights laws and standards, including the United Nations' Guiding Principles on Business and Human Rights (UNGPs), the Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development, and the Voluntary Principles on Security and Human Rights.
- 2. Integration of Human Rights:** We integrate human rights laws and standards into our operational policies and procedures to ensure that our activities promote and protect human rights.
- 3. Human Rights Due Diligence:** We conduct ongoing human rights due diligence to identify, prevent, mitigate, and account for actual or potential adverse impacts or risks on human rights. This includes comprehensive assessments of the human rights implications of our operations and supply chain. We take appropriate actions to address identified issues, ensuring our commitment to upholding human rights.
- 4. Avoidance of Adverse Impacts:** We strive to avoid or minimize causing or contributing to adverse human rights impacts through our activities. If such impacts occur, we take prompt action to address them and engage in processes to mitigate their effects.
- 5. Grievance Mechanisms:** We have established and maintain operational-level grievance mechanisms that provide affected individuals and communities with a transparent and

accessible process to raise concerns and seek redress related to any adverse impacts on human rights. These mechanisms operate in accordance with our Whistleblowing Policy, ensuring that grievances are handled promptly and effectively.

- 6. Safe and Healthy Workplace:** We are dedicated to fostering a safe and healthy workplace environment that prioritizes the well-being of all individuals within our organization. This commitment extends to ensuring equal opportunities and treatment for all employees, irrespective of factors such as race, color, creed, age, gender, language, national or social origin, marital status, sexual orientation, disability, religious, political, or other opinion, or union affiliation.
- 7. Violence and Conflict Policy:** We are committed to maintaining a workplace free from all forms of violence, harassment, intimidation, and conflict. We strictly prohibit any behaviors that compromise the safety, dignity, or well-being of our employees, contractors, or stakeholders. Any instances of violence or conflict will be investigated promptly, and appropriate actions will be taken in accordance with our policies and applicable laws.
- 8. No Forced or Child Labor:** We strictly prohibit the use of forced, indentured, or child labor in any aspect of our operations or supply chain.
- 9. Freedom of Association and Collective Bargaining:** We respect the rights to freedom of association and collective bargaining, and we do not interfere with employees' rights to join workers' organizations or engage in collective bargaining.
- 10. Environmental Responsibility:** We are committed to protecting the environment, using water responsibly, and adopting technologies that reduce emissions contributing to climate change.
- 11. Addressing Industry-Specific Human Rights Exposure:** As part of our commitment to human rights, we are undertaking to develop industry-specific programs and initiatives tailored to the unique challenges present in the mining sector. These programs aim to proactively address human rights challenges associated with our industry.
- 12. Respect for Indigenous Peoples and Local Communities:** We recognize and respect the cultural values, beliefs, and traditions of the indigenous peoples and local communities where we operate. We engage in meaningful dialogue, promote participation, and foster inclusion with potentially affected groups and stakeholders.
- 13. Transparency and Non-Complicity:** Aya acts with transparency, and we do not knowingly engage in activities that cause or are likely to cause adverse human rights impacts.
- 14. Communication of the Policy:** We ensure communication of this Policy to all personnel, including employees, contractors, consultants, and external stakeholders. We recognize the importance of ensuring awareness and understanding of our human rights commitments among all parties involved in our operations.
- 15. Employee Training on Human Rights Protection:** We are dedicated to providing regular training to all employees on the principles and practices of human rights protection. We

believe that a well-informed workforce is essential for upholding our commitment to human rights across our operations.

- 16. Expectations for Contractors and Third Parties:** We expect contractors, consultants, suppliers, intermediaries, agents, and other business partners acting on behalf of or representing Aya to uphold the principles and standards outlined in this Human Rights Policy.
- 17. Protection of Human Rights Defenders:** We respect and do not interfere with individuals who peacefully and lawfully promote or protect human rights.
- 18. Monitoring and Reporting:** We actively monitor and report on human rights impacts resulting from our operations. We are committed to identifying, addressing, and mitigating any adverse human rights effects. Our reporting mechanisms ensure transparency and accountability in line with our commitment to upholding human rights.
- 19. Providing Remedy:** We are dedicated to providing remedies to individuals or communities affected by negative human rights impacts arising from our activities. We take prompt action to address any identified issues and engage in processes to mitigate the effects, thereby demonstrating our commitment to responsible and ethical practices.

This Human Rights Policy has been reviewed and approved at the highest executive level within Aya Gold & Silver Inc. By adopting this Human Rights Policy, we affirm our commitment to upholding human rights and ensuring responsible practices throughout our operations.