

PEOPLE POLICY

OBJECTIVE

The success of our business comes from the accomplishment and well-being of our employees and contractors. Our goal is to build a workplace culture that fosters leadership and allows everyone to thrive, contribute to the company success, and grow.

This People Policy (the "Policy") reflects the commitments of Aya Gold & Silver Inc. ("Aya" or the "Company") to our employees and to those with whom we work. It outlines the commitments we make to select and develop our employees, and to establish and maintain a work environment where everyone can take an active part in reaching our strategic goals while being proud of working at Aya.

SCOPE

This Policy applies to all officers, directors and employees of the Company or any entity that is controlled or managed by Aya. It also applies to the Company's contingent workers, vendors, service providers, contractors, sub-contractors and other types of business partners.

It is applicable to all sites and in all phases of the mine life cycle, including exploration, design, construction, operation, and closure.

CONTENT

- 1. We are committed to the success of all our employees. We believe our talents are a competitive advantage, and our investment in our employees is consistent with that philosophy. We focus on training and development, performance management, succession planning, and talent management. We develop and implement training programs to support capacity building of our employees, including the local workforce. As needed, the Company may deploy international assignees for individual development and to satisfy business needs.
- 2. We treat all people with respect. We are committed to create an environment where employees engage to collaborate and respect each other. We do not adversely discriminate based on nationality, ethnicity, race, religion, gender, gender identity, gender expression, sexual orientation, disability, age, or any other attribute that is protected by local laws. All forms of harassment are prohibited including sexual harassment or harassment in the form of bullying, rude, disrespectful behaviour, or harassment upon legally protected categories. Aya prohibits any threats or acts of violence while conducting business, on the Company's premises or outside.
- 3. We make employment decisions fairly. Our capability to operate and grow our business requires a skilled workforce. We seek to recruit, place, promote, compensate, and retain employees based on their qualifications for the work to be performed, including experience, merit, and other work-related criteria. We develop and communicate procedures, in consultation with stakeholders, that promote fair and transparent recruitment practices.
- 4. We promote an inclusive work environment where diversity is valued. We welcome employees from a wide range of cultures and races. We seek to promote local employment and to increase diversity in our workforce to better reflect the communities where we operate. We desire a work environment where all employees feel valued and are encouraged to contribute to their fullest potential (see the Diversity, Equity and Inclusion Directive).
- 5. We adhere to strict policy of non-discrimination and equal treatment through the employment process. We ensure that all employment decisions are made without regard to race, color, religion, gender, gender identity or expression, sexual orientation, national origin, genetics, disability, age, or any other protected characteristic. We are committed to providing equal employment opportunities, promoting fair treatment, and actively discouraging discrimination or bias at every stage of the employment process. (see Employment Conduct, Non-Discriminatory Treatment and Equal Opportunity Policy).

- 6. We provide a grievance mechanism for workers and contractors and investigate workplace complaints. Aya is committed to open and honest communication at all levels of the organization. Employees are expected to raise questions and concerns and are encouraged to do so through their chain of command. We also have a formal process for anonymously raising workplace complaints whether raised by workers or contractors. All allegations raised through this process are appropriately investigated and corrective actions are taken when merited. We prohibit retaliation toward an employee bringing forward a complaint, grievance, or question (see Whistleblowing Policy Handling of Complaints).
- 7. We compensate in a fair and equitable manner. We realize that to recruit, engage, and retain the best people, we must provide the vision of Aya and make the Company as a compelling place to develop a meaningful and robust career with both financial and growth opportunities. A core component of this is our compensation program, which is based on a compensation philosophy that ensures a competitive and consistent compensation position in all locations.
- 8. We comply with all local laws in order to protect our workforce. We comply with all local laws, including the laws of Morocco, and the Performance Requirements 2 (PR2) as enacted by the European Bank for Reconstruction and Development (EBRD), pertaining to child labour, work hours, leaves and overtime. We do not engage in, or condone, any form of child, forced or compulsory labour at any of our sites.
- 9. Health and safety of our employees are part of our core values. We are committed to provide a safe and healthy workplace for our employees and contractors. Our ultimate goal is zero accident, which we strive to achieve through effective health and safety management in all our operations and projects (see the Health, Safety, Environment and Community Policy).
- 10. We expect our business partners to comply with this Policy and all applicable laws. the Company's contingent workers, suppliers, service providers, contractors, sub-contractors and other types of business partners are expected to comply in all respects to this Policy and applicable laws, including the laws of Morocco (see the Suppliers Code of Conduct).
- 11. We safeguard workers' organizations by fostering an inclusive culture that values open communication and upholds employees' rights. This includes upholding the freedom for workers to organize, join labor unions, or establish collective groups without fear of reprisal. We are committed to establishing transparent policies and procedures to address labor-related concerns, engaging in constructive discussions with worker representatives, and adhering to fair labor practices that prioritize the well-being and rights of all employees.
- 12. We emphasize positive relationships, safe working conditions, and fair and transparent employment terms. We believe in fostering a harmonious workplace environment and adhere to all regulatory standards for all our workers. Our commitment extends to providing competitive compensation and comprehensive benefits that promote the well-being and professional development of our employees.
- 13. We are resolute in our commitment to ethical retrenchment practices and unwavering legal compliance. This duty extends to every member of our workforce. Our dedication to lawful and responsible employment practices emphasizes our core values.

REFERENCES

- Diversity, Equity and Inclusion Directive
- Whistleblowing Policy Handling of Complaints
- European Bank for Reconstruction and Development (EBRD) Performance Requirements
- Employment Conduct, Non-Discriminatory Treatment and Equal Opportunity Policy
- Health, Safety, Environment and Community Policy
- International Labour Organization (ILO) requirements.
- Labour regulations in force in the countries where we operate
- Suppliers Code of Conduct