



HUMAN RIGHTS POLICY

INTRODUCTION

Aya Gold & Silver Inc., its subsidiaries and affiliates (collectively, the "**Company**" or "**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 (the "**Policy**") outlines our commitment to respecting and promoting human rights within our organization and in our interactions with stakeholders. This Policy applies to the Company, its directors, officers, employees, contractors, subcontractors, consultants, vendors, service providers (including private security service providers), suppliers, intermediaries, agents, third parties acting on behalf of or representing the Company, and other business partners (collectively, the "**Stakeholders**"). Adherence to human rights is an essential obligation for all Stakeholders. We expect all Stakeholders 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.** The Company is committed to complying with all applicable local, national and international laws, rules, and regulations regarding human rights. We uphold internationally recognized human rights laws and standards, including the:
 - ✓ International Labor Organization's Declaration of Fundamental Principles and Rights at Work
 - ✓ Universal Declaration of Human Rights
 - ✓ United Nations' Guiding Principles on Business and Human Rights (UNGPs)
 - ✓ Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development
 - ✓ Voluntary Principles on Security and Human Rights
 - ✓ United Nations' Declaration on the Rights of Indigenous Peoples (UNDRIP)
 - ✓ International Labour Organization's Indigenous and Tribal Peoples Convention, 1989 (No. 169) (ILO 169)
 - ✓ International Labour Organization's Convention No. 87 – Freedom of Association and Protection of the Right to Organise (1948) (ILO 87)

- ✓ International Labour Organization's Convention No. 98 – Right to Organise and Collective Bargaining (1949) (ILO 98)

The Company also complies with the European Bank for Reconstruction and Development's Performance Requirement 2 (PR2): Labour and Working Conditions.

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, and mitigate human rights risks and impacts across our business during all stages of project development. This includes comprehensive assessments of the human rights implications in our operations and supply chain. Forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, equal remuneration, and discrimination are covered by our due diligence process. We conduct due diligence within the following areas: our own operations, our supply chain and business activities, our new business relations (mergers, acquisitions, joint ventures). Aya also performs a systematic and periodic review of the risks mapping of potential human rights issues. 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 are committed to maintain, operational-level grievance mechanisms that offer Stakeholders a transparent and accessible process to raise concerns and seek redress related to any adverse impacts on human rights. These mechanisms operate in alignment with our Whistleblowing Policy, ensuring that grievances are addressed promptly and effectively.
6. **Women's Rights.** The Company is firm in its commitment to uphold, protect and respect women's rights.
7. **Safe and Healthy Workplace.** We are dedicated to fostering a safe and healthy workplace environment that prioritizes the well-being of all Stakeholders. The Company implements rigorous safety programs with the goal of achieving zero workplace accidents. Employees and non-employee workers will be provided with safe working conditions. Compliance with health and safety laws and proactive risk management are key components of our operational framework.
8. **Equal Opportunity and Treatment.** The Company is committed to ensuring equal opportunities and treatment for all employees, irrespective of factors such as race, color, creed, age, gender, women, language, national or social origin, marital status, sexual orientation, sexual expression, persons with disability, visible minorities, religious, political or other opinion, union affiliation, Indigenous peoples or any other legally protected characteristic. Equal treatment includes Aya's commitment to equal compensation,

including equal remuneration for men and women.

- 9. Compensation and Living Wage.** The Company fosters a workplace that values fair compensation. All employees receive, at a minimum, a living wage that allows them to meet basic needs and maintain a reasonable standard of living.
- 10. Violence and Conflict.** 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 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.
- 11. 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. All employment must be voluntary, and no person shall be forced or coerced into work.
- 12. Human Trafficking.** Aya is firmly committed to the prevention of human trafficking in all its forms. The company has zero tolerance for any practices that contribute to human trafficking, forced labor, or exploitation. Aya expects all Stakeholders, particularly its employees, contractors, subcontractors, vendors, suppliers, and business partners, to uphold this commitment and to take active steps to prevent and report any suspected instances of human trafficking within their operations or supply chains.
- 13. Freedom of Association and Collective Bargaining.** We respect the rights to freedom of association and collective bargaining without the fear of retaliation or harassment, in line with standards of ILO 87 and ILO 98. We do not interfere with employees' rights to join workers' organizations. Constructive dialogue with worker representatives is encouraged, in compliance with national laws on collective bargaining.
- 14. Environmental Responsibility.** We are committed to protecting the environment, using water responsibly, and adopting technologies that reduce emissions contributing to climate change.
- 15. 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.
- 16. Respect for Indigenous Peoples and Local Communities.** Aya acknowledges and respects the rights of indigenous peoples and local communities. As such, Aya is committed to adhering to the international standards set forth in the UNDRIP and ILO 169. We respect the principle of Free, Prior and Informed Consent (FPIC) as set forth in the UNDRIP. We will assess the cultural, social, and environmental impacts of our operations and will secure free, prior, and informed consent prior to commencing operations on traditional Indigenous lands. We recognize the unique nature of Indigenous peoples 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.

- 17. Transparency and Non-Complicity.** The Company acts with transparency, and we do not knowingly engage in activities that cause or are likely to cause adverse human rights impacts.
- 18. Expectations for Contractors and Third Parties.** We expect our contractors, subcontractors, consultants, suppliers, services providers, vendors, intermediaries, agents, and other business partners acting on behalf of or representing the Company to strictly comply with the principles and standards outlined in this Policy. Where the Company engages private security forces, such security providers are expected to act in a manner consistent with this Policy and with the Voluntary Principles on Security and Human Rights. Aya is committed to ensuring that private security forces respect human rights and will require private security providers to use competent and appropriately trained personnel with an understanding of security-related human rights issues.
- 19. Protection of Human Rights Defenders.** We respect and do not interfere with individuals who peacefully and lawfully promote or protect human rights.
- 20. 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.
- 21. Employee Training on Human Rights Protection.** We believe that a well-informed workforce is essential for upholding our commitment to human rights across our operations. We provide regular training to all employees on the principles and practices of human rights protection, including on discrimination and harassment in the workplace.
- 22. 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.
- 23. Providing Remedy.** We provide 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.

REPORTING VIOLATIONS

Aya provides a formal grievance mechanism for Stakeholders to report concerns regarding human rights, workplace conditions, discrimination, or other issues covered by this Policy. Complaints may be filed confidentially, and no Stakeholder will face retaliation. If you have any questions or if you wish to report a violation or possible violations, please feel free to write an email or call the Chief Legal Officer of Aya. You may also use the confidential whistleblower mechanism detailed in the Company's Whistleblowing Policy. All reports will be treated confidentially except to the extent necessary to conduct investigations.

REVIEW AND AMENDMENT OF THIS POLICY

The Environment, Social and Governance Committee of Aya's Board of Directors is responsible for annually reviewing and evaluating this Policy. This Policy has been reviewed and approved by the Company's Board of Directors. By adopting this Policy, we affirm our commitment to upholding human rights and ensuring responsible practices throughout our operations.

Last Updated: May 2025

Approved by the Environment, Social and Governance Committee of the Board of Aya Gold & Silver Inc.