

Human Rights Policy

1. Introduction & Objective

Our goal is to be recognised as a global leader in developing greenfield nickel projects in a sustainable manner. As a socially responsible company, operating in Brazil with headquarters in London, we are committed to observing and respecting all human rights, as articulated in: the United Nations (UN) Guiding Principles on Business and Human Rights; the UN declaration on Human Rights; International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work; the UN Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

2. Applicability

This Policy applies to the Horizonte Minerals Group and its subsidiaries and must be disclosed in its companies, always respecting the constitutive documents and applicable legislation.

All Employees must know and be committed to the rules established in this Policy and are responsible for disseminating and practicing the guidelines contained herein.

All Customers and Suppliers, including other Group Partners, must know and observe this Policy to guide their conduct and avoid conflicts and violations.

3. Context & Principles

We operate in accordance with:

- the Voluntary Principles on Security and Human Rights (Voluntary Principles);
- International Finance Corporation's Performance Standard & EHS Guidelines for Mining (2007);
- Equator Principles (IV);
- The World Bank Group (WBG) Environmental Health and Safety (EHS) Guidelines (2007);
- IFC / EBRD Workers Accommodation: Processes and Standards (2009); and
- Good International Industry Practice (GIIP) Guidance.

4. Human Rights Policy

Horizonte Minerals Plc recognizes the United Nations Universal Declaration of Human Rights and integrates these principles into our organizational practices via our Business Integrity policy; our Company Values and Zero Tolerance guideline. Our commitment and support for human rights is made publicly to all relevant stakeholders, including our employees and contractors, as well as the local communities and government agencies where the Company operates.

The Company performs its activities to high standards of sustainability and good industry practices in pursuit of social and economic development environmental conservation, human dignity and social justice.

The Company respects and practices diversity among its workers, as demonstrated by our Zero Tolerance guideline for all employees and contractors, prohibiting any discrimination by employees or contractors in relation to race, sex, religion, political opinion, nationality, social status or any other minority group. The Company guarantees safe, satisfactory and equitable working conditions for all its employees, assuring them all legal labour rights and the free right of association and protection of their interests. The Company applies a strict Zero Tolerance policy to any child or slave labour both internally and externally through supply chain.

The Company has adopted IFC Performance Standard 5 in relation to land acquisition and involuntary resettlement for both of its nickel projects in Brazil and has a Resettlement Action Plan in place for its Araguaia project. Additionally, Horizonte has made specific commitments to meeting IFC Performance Standard 2 requirements and to be aligned with the 'Core Conventions' of ILO including workers' representation, collective bargaining, wages, non-discrimination, child and forced labour. The Araguaia Project will generate employment for up to 2,200 temporary workers (contractors) during construction most of whom will be accommodated at the Project; HZM recently developed the Workers' Accommodation Plan (November 2020) and a set of procedures outlining Human Resources Policies and Human Rights management (according to Brazilian legislation) as part of the Contractor Management Package. It is expected that around 500 permanent jobs will be created during Araguaia's operations.

The Company operates open and transparent communication channels with its stakeholders, including anonymous complaints handling and whistle-blower policies. Strong community engagement mechanisms are in place to capture feedback from rural communities and potentially vulnerable groups about the Project's operations.

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We recognise that mining activities, from exploration to construction, operation and closure, pose potential risks to Human Rights and we are working to implement stringent policies and procedures to reduce those risks. In particular, Horizonte seeks to engage with vulnerable groups and ensure that their views are heard and incorporated into our business practices.

Horizonte adheres to the UN Guiding Principles Reporting Framework to report on how we respect Human Rights, and we use our annual Sustainability Report to disclose our human rights performance.

This Policy was established to promote awareness and respect for Human Rights both internally and externally to Horizonte stakeholders and is administered by our Corporate Environment, Social and Governance Team.



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Approved in September 2021

