

HUMAN RIGHTS POLICY

West Vault Mining Inc. (“**West Vault**” or the “**Company**”) is committed to promoting a culture of respect for human rights and inclusion that aligns with the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, international humanitarian law and applicable local human rights legislation. We will safeguard the promotion of human rights in the workplace and integrate human rights into our due diligence and risk assessment processes, and other policies and procedures. We will assess all human rights issues, determine their severity and act upon our findings.

The Board of Directors (the “**Board**”) of the Company is responsible for the oversight of the Human Rights Policy (the “**Policy**”) including:

- a. Reviewing the effectiveness and compliance of this Policy on a regular basis.
- b. Monitoring the Company’s performance, challenges and commitments in the prevention or mitigation of any human rights issues.
- c. Reviewing the proposed public disclosure of any Company human rights matters.

To achieve our human rights commitments, West Vault will:

- Respect the rights and dignity of our employees, directors, consultants, contractors, partners and community members affected by our business.
- Create a safe, inclusive and diverse workplace where decisions are non-discriminatory towards race, color, religion, nationality, gender, gender identity, ethnicity, age, marital status, creed, sexual orientation, political beliefs, pregnancy, disability or other basis prohibited by law.
- Respect workers’ rights, including freedom of peaceful assembly and association, and engagement in collective bargaining consistent with the relevant International Labour Organization conventions on that subject.
- Take actions to raise employee awareness of international standards and guiding principles for human rights and provide regular training on this Policy.
- Engage in constructive dialogue and partnerships with our stakeholders to better understand how our activities affect their human rights.
- Establish operations-level grievance and dispute resolution mechanisms for human rights issues.
- Maintain a zero tolerance approach to the use of forced, compulsory or child labour.
- Continuously seek improvements to this Policy and other human rights related programs and procedures to further embed respect for human rights into the Company’s culture, operations and workforce.



Compliance

This Policy applies to West Vault and its wholly-owned subsidiaries. West Vault expects that each of its wholly-owned subsidiaries that conduct mining operations will establish procedures to ensure compliance with this Policy. All West Vault board members, officers, contractors or any third-party conducting work or acting on West Vault's behalf will behave in a manner that respects human rights and avoids infringing upon them. West Vault will take appropriate measures to ensure that this policy is respected.

West Vault will clearly communicate the expectation that all employees, directors, consultants and contractors will comply with this Policy.

For Company employees, non-compliance with this Policy may be grounds for disciplinary action up to and including termination of employment. For directors, non-compliance may be grounds for case-specific disciplinary action, which may include immediate discharge or removal. For consultants and contractors, non-compliance may be grounds for contract termination.

Approved by the Board on _____, 2022.

To the extent that any joint venture is not controlled by the Company, the Company will use its influence to cause the joint venture(s) to adopt and follow policies substantially consistent with this Policy.



Policy Acknowledgement

I, (insert name) _____ hereby acknowledge, having reviewed West Vault Mining Inc.'s Human Rights Policy, that I understand its provisions and will respect and comply with the Policy and its intent.

Signature

Date