



ENVIRONMENTAL & COMMUNITY POLICY

(JANUARY 2020)

At Lucky Minerals, we will execute our business with strong environmental and community stewardship through the development of a sustainable approach to Corporate Social Responsibility. We all are accountable for promoting leading practices in environmental protection and community relations and for communicating our environmental and community expectations to employees, contractors, local communities, regulators, the general public and other stakeholders. We will strive to create a workplace where every one of our employees commits to a culture of environmental protection, sustainable resource development and sustainable community engagement. In the jurisdictions in which we operate, we will diligently apply appropriate methodologies to protect the environment and communities over the full life cycle of mining, including throughout our exploration, development, mining, processing and closure activities.

Our environmental obligations include, but are not limited to, promoting a culture of “zero harm” to the environment and host communities in which we operate, striving for continuous improvement in our environmental performance, and obtaining permits and approvals and maintaining compliance with all applicable laws and regulations in the countries in which we operate. We are committed to fulfilling each of these obligations in an effective and responsible manner.

In advancing each of our environmental and community values, standards and commitments, we will:

- Comply with all applicable environmental laws, rules and regulations, and all applicable regional and site rules and regulations in the countries in which we operate
- Develop, implement and evaluate our environmental and community development programs and management systems with a view to continually improving our environmental and community performance
- Develop, design and operate our facilities based upon the efficient use of energy, resources and materials, encouraging biodiversity, and maximizing host community benefits
- Identify, assess and manage material environmental and community risks with a goal to minimize harm to the environment and our communities
- Develop a system to allow our communities to bring forward concerns related to all phases of our operations, commit to meaningful consultation and build respectful relationships with such communities, including indigenous peoples
- Encourage dialogue on environmental and community issues, and respond to public and other stakeholders’ inquiries in an open, timely, forthright and sincere manner
- Develop appropriate community engagement and development systems to prioritize support for sustainable development, including equitable access to jobs, training and education opportunities
- Recognize the important role and responsibility we have in respecting the human rights of our stakeholders and align this commitment with the “Protect, Respect, Remedy” framework of the United Nations Guiding Principles on Business and Human Rights

- Conduct human rights reviews and assessments at our operations to augment our existing management of human rights

This policy applies to all directors, officers, employees and work partners of Lucky Minerals Inc., our subsidiaries, affiliates and joint ventures, wherever located.