

Human Rights Policy

Respect for human rights is core to Lundin Mining Corporation and its subsidiaries (“Lundin Mining” or the “Corporation”). Our approach to human rights is supported by the conviction that our activities have a positive impact on the lives, livelihoods and rights of individuals and communities. We acknowledge that our operations could cause, contribute or be directly linked to negative human rights impacts. We seek to prevent and mitigate adverse impacts and to contribute to the promotion of broader societal respect for and protection of human rights.

A. PURPOSE

This Human Rights Policy (“Policy”) is designed to complement and enhance our pre-existing commitment to human rights as stated in our Code of Conduct, Ethical Values and Anti-Corruption Policy, as well as related principles described in our Responsible Mining and Diversity and Inclusion Policies. It establishes guiding concepts in how we identify, prevent, mitigate, track and report on human rights risks and issues associated with our projects and operations. Implementation of this Policy will help guide us in our efforts to avoid causing or contributing to human rights impacts and to facilitate access to remedy when we do.

B. OUR APPROACH TO HUMAN RIGHTS

While governments have the primary duty to protect human rights, we recognize our responsibility to respect human rights and that opportunities will exist to promote them. Therefore, as a Corporation, our approach to human rights is guided by the following principles:

- We support and respect internationally recognized human rights as proclaimed by the International Bill for Human Rights, and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work. This means that we are committed to and always strive to align our actions with the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact and the Organization for Economic Cooperation and Development Guidelines for Multi-National Enterprises.
- We do not tolerate human rights violations committed by our employees or any third parties acting on our behalf nor will we be complicit in any human rights abuses. We do not tolerate threats, intimidation, or attacks against human rights defenders. We will take appropriate action where we identify violations of this Policy by employees or third parties acting on our behalf.
- We prohibit the use of any form of forced or compulsory labour, including child labour.
- We are committed to providing safe and healthy working conditions. This includes ensuring that everyone in our workplace is treated with dignity and respect.
- We uphold the freedom of association and recognize the right to collective bargaining.
- We respect the rights, interests, culture and traditions of all stakeholders where we operate, including Indigenous Peoples.

C. OUR ACTIONS TO ADVANCE AND PROTECT HUMAN RIGHTS

To help ensure we apply the principles in this Policy, we take the following actions:

- We integrate human rights into our business practices and processes that inform our decision-making, including standards and procedures that promote human rights due diligence and risk assessments.
- We work to comply with and demand that our suppliers and contractors comply with all national laws and we integrate our commitment to respect human rights into our commercial arrangements with our business partners.
- We have integrated the Voluntary Principles on Security and Human Rights into our security-related policies and procedures.
- We seek continuous engagement with local communities and other stakeholders affected by our operations to develop and sustain relationships of trust and transparency.
- We communicate this Policy to our employees and any third parties acting on our behalf. We provide training on our human rights expectations to relevant employees and promote human rights in our public engagement.
- We adopt effective mechanisms for reporting (including anonymously) and investigating grievances related to allegations of human rights impacts and, where substantiated, we endeavour to resolve such grievances in an expeditious and fair manner, facilitating access to remedy and without fear of retaliation.
- We conduct periodic audits or reviews of our compliance with the letter and spirit of this Policy in an effort to continuously improve our human rights performance.
- We report on human rights in various instruments, including through our annual Sustainability Report, our corporate website and in our annual United Nations Global Compact Communication on Progress.

D. SCOPE

This Policy applies to all Lundin Mining employees, whether permanent, temporary or on contract, and includes senior management and Board of Directors. It also applies to our contractors and suppliers.

A copy of this Policy will be posted to the Corporation's website.

*Approved by the Board of Directors on **October 27, 2021**.*

Board of Directors