
HUMAN RIGHTS POLICY

1. INTRODUCTION

As a socially responsible global company, Capstone Copper Corp. and its subsidiaries (together, “**Capstone**”) are committed to respecting and promoting human rights of all individuals. In our business activities, we comply with applicable laws and respect international human rights standards, including without limitation the *United Nations Guiding Principles on Business and Human Rights*, the *United Nations’ Universal Declaration of Human Rights*, and the *Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises* in the extractive sector. Capstone recognizes and upholds the inherent right to dignity and worth of the human person and its responsibility to respect the human rights of all people impacted by our business.

2. PURPOSE

The objective of this global policy is to outline Capstone’s guiding principles and standards with respect to human rights and to articulate Capstone’s expectations to its employees, directors, and Suppliers.

3. DEFINITIONS

“**Human Rights**” are internationally defined and recognized rights inherent to all human beings, regardless of race, gender, nationality, ethnicity, language, sexual orientation, religion, or any other status.

“**Suppliers**” means any person, corporation or other legal entity that provides goods or services to or on behalf of Capstone, and all of their parent and affiliated companies (including subsidiary) and their respective employees, contractors and agents. Supplier includes consultants, vendors, contractors, and agents.

4. SCOPE

This policy applies to all Capstone employees, directors, and Suppliers.

5. INTERACTION WITH OTHER POLICIES

This policy supplements and should be read in conjunction with Capstone’s other policies applicable to our employees, directors, and Suppliers, including without limitation Our Values and Ethics – Code of Conduct, Respectful Workplace Policy, Diversity and Inclusion Policy, Anti-Bribery Policy, Fraud Reporting and Investigation (Whistleblower) Policy, Integrated Environmental, Health, Safety and Sustainability (EHSS) Policy, and any other site-specific policies.

6. GUIDING PRINCIPLES AND STANDARDS

Capstone will:

- adhere to all applicable human rights law and regulations of countries where we operate;
- respect the principles of internationally recognized human rights;
- reflect internationally recognized human rights laws and standards in our global policies and procedures;
- apply the same standards set out in this policy to all of our sites and Suppliers, and expect compliance of this policy;
- commit to fair labour practices at all of our workplaces and respect the rights to freedom of association, freedom of speech and collective bargaining;

- provide equal opportunities to people without regard to race, colour, gender, sexual orientation, nationality, religion, ethnic affiliation, family/friend relationships or any other characteristic protected by local law as applicable, as reflected in our Values and Ethics (Code of Conduct);
- provide a safe work environment that is free from violence, threats, harassment, and bullying by prohibiting all acts of unwelcome conduct or comments, verbal or written, which detrimentally affect an employee's safety and work environment, as reflected in our Values and Ethics (Code of Conduct) and our Respectful Workplace Policy;
- confirm that child and forced labour are not present in our operations, and apply appropriate due diligence to minimize the risk of child and forced labour in our supply chain;
- recognize and respect the cultural values, beliefs and traditions of people in the countries and regions in which we operate in including the rights of indigenous peoples;
- engage in dialogue and promote the participation with affected internal and external stakeholders on human rights matters, prioritizing engagement with the most affected stakeholders with emphasis on the rights of vulnerable groups;
- recognize access to water as a fundamental human right, commit to use it efficiently and responsibly and engage collaboratively with stakeholders to address water challenges¹; and
- Identify security-related human rights risks and operate in a manner consistent with the Voluntary Principles on Security and Human Rights;

Capstone actively strives to avoid or mitigate any adverse impact of our activities on our employees and external stakeholders, and to engage in communications and processes to address such impacts if they occur. External stakeholders include shareholders, investors, customers, Suppliers and local communities.

7. ONGOING COMMITMENT, MONITORING, ASSESSMENT, AND DISCLOSURE

Capstone will strive to formalize our process and procedures to assess and audit for human rights compliance, including a process to conduct appropriate due diligence, ongoing monitoring and assessment on our Suppliers in their human rights compliance (including compliance with this policy), and procedures to evaluate and track the effectiveness of our human rights response.

These measures will allow us to identify areas for improvement and continuously enhance our human rights practices.

We recognize the importance of transparent reporting and accountability in promoting human rights. As part of our commitment to transparency and compliance, we will report the steps we have taken to uphold human rights at Capstone, including in our supply chains.

We provide periodic training on Capstone's human rights guiding principles and standards set out in this policy to all new employees and existing employees, directors and Suppliers.

¹ For more information on our approach to water management and commitment to sustainable practices, please refer to our Integrated EHSS Policy.



8. INVESTIGATION AND REPORTING

If a concern exists regarding human rights matters and violations, employees, directors, and Suppliers should follow the Complaints Procedure outlined in the Code of Conduct and report their concern in person or anonymously via Capstone's whistleblower hotline.

Employees are encouraged to raise concerns regarding ethical, policy, or human rights issues and they are assured protection from any potential adverse personal impacts associated with filing a complaint and is to be free from any concern about retaliatory consequences. Reprisals or intimidation of employees who draw attention to problems or violations will not be tolerated.

In conducting any investigation, all reasonable efforts will be made to protect an employee's anonymity. Furthermore, no employee will be adversely impacted for reasonably refusing to carry out a directive which they consider to be in violation of this policy.

All human rights breaches are collected quarterly and reported to the President & COO, SVP, Risk, ESG & General Counsel, and SVP, Corporate Development. Significant breaches to the Code of Conduct (including human right violations) as defined in the Oversight of Code of Conduct Framework are reported to the Governance, Nominating and Sustainability (GNS) Committee on a quarterly basis.

9. NON-COMPLIANCE WITH POLICY

Capstone respects the human rights of all individuals impacted by our operations and we treat human rights violations or other related criminal acts seriously wherever we operate.

In the case of employees, failure to comply with this policy, including without limitation omission to report human rights violations of other employees or Suppliers, may result in severe consequences, which could include disciplinary action up to and including termination of employment. Violation of this policy may also violate applicable laws and if it appears that an employee may have violated such laws, Capstone may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

In the case of Suppliers, violation of this policy may result in termination of a contract without notice, or such other measures that are available at law.

10. QUESTIONS

Should you have any questions or require any further information concerning this policy, please contact Capstone's SVP, Legal, Risk and Governance or your local HR leader.

11. AMENDMENT

This Policy may be translated into other languages. In the event of any discrepancy between the original English version and any translation, the English version will prevail.

Issue Date: March 23, 2022
Review: Annually
Revised Date: August 1, 2023

Authorized By: Board of Directors