

1. Purpose

K92 Mining Inc., together with its subsidiaries (collectively “K92, “we” or the “Company”), is committed to respecting local and internationally recognized human rights, including those set out in the International Bill of Human Rights and the International Labour Organization (“ILO”) Declaration on Fundamental Principles and Rights at Work, in line with the United Nations Guiding Principles on Business and Human Rights.

The Company has developed this human rights policy (the “Policy”) to describe the Company’s commitments to human rights, and to summarize how these commitments will be implemented and administered by K92.

2. Application of Policy

The Policy applies to all of the Company’s directors, employees, contractors and consultants (“personnel”).

3. K92’s Commitment to Human Rights Principles

Recognizing that respect for human rights is an essential part of good business practice and risk management, we are committed to:

- a) Not discriminating against any individual on the basis of race, gender, religion, age, social status, sexual orientation or any other characteristic unrelated to the individual’s job performance.
- b) Avoiding infringing the human rights of personnel, workers in our supply chain, and members of communities affected by our operations.
- c) Carrying out human rights due diligence, including risk assessments at our operations and in our supply chain.
- d) Providing an equitable, diverse and inclusive workplace, including fair pay practices.
- e) Providing regular human rights training to our employees, and communicating this policy to personnel and external stakeholders regularly.
- f) Not tolerating the use of forced labour or child labour (as those terms are defined by the ILO), including not directly employing anyone under the age of eighteen years old.
- g) Promoting our human rights expectations of suppliers through our Supplier Code of Conduct.
- h) Maintaining processes to prevent, investigate, mitigate and resolve human rights issues.
- i) Providing accessible feedback and grievance methods including anonymous means.

4. Meeting Host Government Legal Requirements

We meet the laws of the countries in which we operate, and, where conflicts exist between the Policy and applicable local laws, we meet local laws while seeking to meet the commitments in the Policy to the extent possible.

5. Questions and Reporting of Complaints

Personnel and others are encouraged to ask questions about the Policy, and to report any concerns or suspected violations of the Policy ("**Reports**"). Questions and Reports can be brought:

- a) to an immediate supervisor;
- b) through the Company's site-level grievance mechanisms; or
- c) to the Chair of the Audit Committee as described in Schedule "A."

Safeguards Against Retaliation

The Company understands and acknowledges that a decision to report can be difficult. The Company will take appropriate action to protect anyone who asks a question or makes a Report in good faith (a "**Concerned Person**") and will not tolerate any retaliation against a Concerned Person.

6. Confidentiality and Anonymity

Questions and Reports by Concerned Persons will be treated to the extent possible on an anonymous and confidential basis. In a rare case, the absence of identifying and contact information may mean action cannot be taken because to do so will identify the source of the concern or complaint. The Company may need to take action in some instances, for example, if it involves a breach of law or harm or risk.

7. Review of Policy

This Policy will be reviewed by the K92 Board of Directors on an annual basis.

EFFECTIVE DATE

This policy was adopted by the Board of Directors effective July 26, 2023 and was reviewed and updated on May 26, 2025.

Human Rights Policy

Schedule “A”

Confidential Reports can be made in writing to:

K92 Mining Inc.
c/o Audit Committee Chair – Mr. Saurabh Handa (Confidential)
1090 West Georgia Street, Suite 488
Vancouver, BC
Canada
V6E 3V7

Or by email to: report@K92whistleblower.com