



HUMAN RIGHTS POLICY

1. INTRODUCTION

Lundin Gold Inc., including its subsidiaries (collectively, “Lundin Gold” or the “Company”), is committed to respecting and observing all human rights, including the rights of our employees, contractors, workers in our value chain, members of communities where we work, and others potentially affected by our activities. Fundamental to our commitment to responsible mining, we seek to prevent or mitigate any negative impacts of our activities and to maximize our positive impacts, including in relation to human rights.

Our approach to human rights is guided by:

- The Universal Declaration of Human Rights
- The United Nations Guiding Principles (UNGP) on Business and Human Rights
- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
- The United Nations Global Compact
- The International Covenant on Economic, Social and Cultural Rights
- International Labour Organization Convention 169
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

2. APPLICATION OF THIS POLICY

This Policy applies to all Lundin Gold directors, employees and contractors. We expect our suppliers to respect human rights and to agree to our supplier code of conduct which outlines our expectations of them.

3. OUR COMMITMENT TO RESPECT HUMAN RIGHTS

As a company committed to respecting and observing all human rights, we will:

- seek to avoid infringing, directly or complicitly, on the human rights of our employees, contractors, workers in our supply chain, and members of communities where we work.
- not tolerate the use of modern slavery, including forced labour, child labour or human trafficking of any kind, in our operations or supply chain and support the elimination of all forms of modern slavery.
- communicate our expectations to suppliers, business partners, and customers that they have processes that respect human rights and that they remedy their offending practice or policy if they are in violation of human rights.
- strive to conduct on-going human rights due diligence, including human rights risk

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assessments at our operations and other workplaces and in our supply chain, put in place processes to prevent, mitigate and remedy human rights impacts, and investigate potential human rights issues, as appropriate.

- provide employees, contractors, workers in our supply chain and community members with accessible feedback and grievance mechanisms, including an anonymous whistleblower hotline available to all.
- involve rightsholders in the due diligence process, including vulnerable or historically disadvantaged groups such as Indigenous Peoples and women, and communicate results as needed.
- respect the collective and customary rights, interests, culture and connection to the land of directly affected Indigenous Peoples in our area of influence, including the rights provided by UNDRIP.
- respect the right to a clean, healthy and sustainable environment of our employees and members of communities where we work.
- adopt fair employment practices and foster a workplace that is equitable and in which all individuals are treated with dignity and respect, including not tolerating discrimination against individuals on the basis of race, colour, gender, religion, political opinion, ethnicity, age, nationality or social origin, sexual orientation, or union membership.
- aim to pay all employees and contractors fairly, including enforcing working hours to the best of our ability aligned with ILO standards and providing fairly compensated overtime and pay for periodic holidays and time off.
- respect the freedom of expression and right to associate of our employees and contractors, including their right to bargain collectively.
- avoid resettlement and, where unavoidable, follow procedures aligned with international standards to minimize impacts and act responsibly and with respect for those affected.
- not tolerate threats, intimidation or attacks against human rights defenders in relation to our activities and relationships.
- commit to security arrangements for our business that respect human rights in line with the Voluntary Principles on Security and Human Rights and also commit to promoting their awareness and adoption.
- ensure human rights training has been provided to employees and contractors in relevant roles.

4. MONITORING AND REPORTING

Collectively, we are each responsible for ensuring that we meet our commitments. The Company will regularly evaluate the implementation of this Policy through periodic internal and external assessments and will report on our performance annually in our sustainability-related disclosures.

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We expect our employees, contractors and suppliers to speak openly about any human rights concerns to their supervisors or to raise them using one of the Company's grievance mechanisms.

Human rights concerns may be reported on a confidential and anonymous basis as directed under Lundin Gold's Whistleblower Policy or through Lundin Gold's Whistleblower website at www.integritycounts.ca/org/lundingold.

5. REVIEW

The Vice President, Legal and Sustainability will review this Policy on an annual basis, or as required, and will recommend modifications to the Board of Directors, as needed.

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