

**Subject:** Human Rights Policy

**Identification:** POL-002

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## Executive Summary

The companies of Lithium Ionic Group (including MGLIT Empreendimentos Ltda., Neolit Minerals Participações Ltda., Salit Mineração Ltda., among others) (hereinafter referred to, jointly, simply as “LI Companies”) are firmly committed to ensuring respect for human rights is integrated across all aspects of our business. Our Human Rights Policy outlines strategic guidelines and commitments to promote inclusion, equity and dignity.

We respect all internationally recognized human rights standards and prohibit practices like forced labor, child labor and discrimination. Fair employment, health and safety are top priorities. Robust processes ensure risks are identified, mitigated and remediated through engagement.

Our commitments extend to security personnel, suppliers and local communities. Continuous monitoring includes annual reviews and stakeholder feedback to strengthen performance over time. Employees must comply with our Codes of Conduct.

Areas of focus include non-discrimination, living wages, freedom of association, and addressing grievances. Extensive training further cultivates a rights-respecting culture. Senior leadership endorsement demonstrates our commitment from the highest levels.

### 1. Goal

Lithium Ionic Group is committed to upholding and respecting human rights across all operations, partnerships, and supply chains. Our dedication to inclusion, equity, and respect extends to our employees, contractors, workers in our value chain, local communities, and all others affected by our activities.

We maintain human rights standards throughout our value chain by ensuring legal and ethical compliance and requiring our suppliers to partner with entities that align with our Human Rights Policy and Code of Conduct and Ethics.

We actively engage with communities to manage socio-cultural, economic, and environmental impacts. In Minas Gerais, we specifically recognize and respect the rights of Quilombola communities, ensuring our operations align and respect their social structures and land rights, in alignment with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

Additionally, we adhere to local laws and regulations and collaborate with authorities to promote internationally recognized human rights.

## 2. Scope and Application

The Human Rights Policy applies to all Administrators, Board members, Directors, Employees, Service Providers, Subsidiaries, Contractors, and Supply Chain partners. The policy, owned by Lithium Ionic Group, is intended for both internal and external use and is accessible on the corporate website. To ensure the most current version is used, dissemination will be exclusively digital, and the policy will be updated as needed. The normative instruments within this policy are designed to be a dynamic and ongoing source of guidance for the execution of LI Companies' work processes.

## 3. References

1. UN International Bill of Human Rights - Universal Declaration of Human Rights (1948);
2. International Covenant on Civil and Political Rights (1976);
3. International Covenant on Economic, Social and Cultural Rights (1976);
4. UN – Guiding Principles on Business and Human Rights (2011);
5. Voluntary Principles for Human Rights and Security; Human Rights Policy (2000);
6. ILO -Fundamental Conventions of the International Labor Organization (Conventions 29, 87, 98, 100, 105, 111, 138 and 182) (1930-1999);
7. IFC (International Finance Corporation) Performance Standards (2012);
8. GRI – Global Reporting Initiative (GRI Standards Guidelines) (2016);
9. Canadian Human Rights Act (1977, amended 2017);
10. Canadian Charter of Rights and Freedoms (1982);
11. ILO Occupational Safety and Health Convention (1981);
12. UN Basic Principles on the Use of Force and Firearms (1990);
13. IRMA Standard for Responsible Mining (2018);
14. UN Declaration on the Rights of Indigenous Peoples (2007).

## 4. Guidelines

### 4.1 Strategic Guidelines

LI Companies are committed to promoting a business culture that embraces inclusion, diversity, innovation, and growth, respects all internationally recognized human rights, and maintains the highest ethical standards in both internal and external operations.

LI Companies are committed to creating equal employment opportunities and cultivating a diverse, inclusive work environment. To support this commitment, employees must comply with the LTH Code of Business Conduct and Ethics and the MGLIT Code of Conduct, which outline our human rights expectations and requirements. LI Companies prohibit physical punishment, child labour, and forced labour, ensure compliance with living wage standards, and guarantee that wages, benefits, and work hours align with legal agreements. Additionally, we are dedicated to upholding equal pay, non-discrimination, freedom of collective association, and anti-harassment measures.

### 4.2 Monitoring and Management of Risks to Human Rights

Even when our ability to influence is limited, LI Companies commit to collaborating with interested parties, including employees, suppliers, contractors, partners, communities, governments and society, to contribute to actions that raise awareness and promote human rights.

Lithium Ionic Group commits to annual monitoring of performance and collecting stakeholder feedback. As outlined in the IRMA standards for responsible mining, we pledge that if internal efforts fall short in addressing any human rights issues, we will engage an external company to manage these actions, ensuring alignment with industry best practices. Furthermore, we will periodically disclose details of our due diligence activities, including major issues, risks, and actions taken, through our corporate sustainability reporting initiatives.

While Lithium Ionic Group will maintain ongoing monitoring of human rights risks and adhere to the objectives of this policy, we will also develop a Human Rights Management Plan aligned with IRMA standards. This plan will specifically address the prevention, mitigation, and resolution of human rights risks identified in the future completion of a Security Risk Assessment. We are unwavering in our commitment to uphold the policy's objectives and values, ensuring that our practices consistently reflect our dedication to

human rights. This entails prioritizing actions grounded in accountability and engagement, fostering collaboration and mediation as needed, and ensuring concerned parties' access to grievances. Moreover, LI Companies are committed to continually assessing the effectiveness of mitigation strategies.

### **4.3 Collaborators**

LI Companies provide fair and safe working conditions and seek to promote educational activities that enable employees' professional and personal growth. LI Companies maintain a safe and healthy work environment, respect and value diversity, promote inclusion, and do not tolerate discrimination or harassment.

LI Companies prohibit the use of child labour or any employment practices that could be interpreted as equivalent to forced or compulsory labour.

### **4.4 Safety at Work**

LI Companies prioritize the health and safety of workers above economic considerations. We closely monitor employees and contractors, taking into account past experience and technical proficiency. This monitoring process is reviewed annually to ensure compliance with human rights and security requirements and allow for the implementation of proactive measures, with the objective of cultivating a safe working environment for all.

This monitoring process will include record-keeping for workplace surveillance, health monitoring, and incident tracking. The company will annually review key security metrics to evaluate the effectiveness of our security measures. Furthermore, our future Security Risk Assessment will include evaluating potential human rights risks.

### **4.5 Hiring Practices**

LI Companies uphold fair recruitment practices by providing contracts written in local languages for review prior to employment, refraining from imposing fees, and not withholding workers' official identity documents. LI Companies will also ensure there are no unreasonable restrictions on worker movement and access to fundamental freedoms.

### **4.6 Security**

LI Companies are committed to ensuring safety, respecting human rights, and avoiding the use of force. To align with industry best practices and IRMA mining

standards, contracted companies and security personnel must have a proven track record of adhering to human rights requirements and must uphold all human rights standards throughout their engagement with Lithium Ionic Group.

LI Companies will assess security risks and consider stakeholder perspectives to create culturally appropriate mitigation strategies. To align with industry standards and IRMA requirements, all security personnel must comply with the United Nations Basic Principles on the Use of Force and Firearms, which outline the appropriate use of force. Comprehensive training will be provided to ensure that all security personnel understand and fulfill their obligations as contractors to Lithium Ionic Group. Any security incidents will be documented, investigated, and summarized in a security report detailing the specifics of the incident. These reports will contribute to transparency in our security endeavours.

## 5. Management Commitment

Senior Management is responsible for upholding the values and principles set forth in this policy, while also guiding the development of projects and initiatives that align with these commitments.

## 6. Disclosure, Revision, and Implementation

This Policy will be disseminated, archived, and published on the website, coming into effect on the date of its publication and replacing any previous versions. It will be reviewed within a maximum of two years, or as needed, to ensure its content remains current.

## 7. Version Histories

Date	Elaborate	Version
19/08/2024	Idalia S. Rodrigues & Katrina Diez	01