



AURA MINERALS INC.
(together with its subsidiaries, the “**Company**” or “**Aura**”)

POLICY NAME:	Human Rights Policy (the “ Policy ”)
SCOPE:	This Policy is applicable to: (i) the Board of Directors; (ii) all employees of the Company; (iii) business and joint venture partners of the Company; and (iv) consultants, contractors and suppliers of the Company (collectively, “ Aura Personnel ”).
POLICY CUSTODIAN:	Corporate Governance, Compensation and Nominating Committee of Aura Minerals Inc.
AUTHORISED BY:	Board of Directors of Aura Minerals Inc.
DATE:	June 7 th , 2021
REVISIONS:	

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1. SCOPE OF THE POLICY

This Policy is applicable to all Aura Personnel. It is applicable to all sites and in every phase of the mine life cycle, including exploration, development, construction, operation and closure.

Accountability for implementation of this Policy lies with Aura's Chief Executive Officer and with the General Managers of Aura's operations.

Any Aura Personnel implicated in human rights violations may face penalties ranging from disciplinary sanctions to termination of employment or contractual agreements, as the case may be. Any Aura Personnel who have direct knowledge of, but fails to report human rights violations of employees, suppliers or contractors may face penalties. Any employee who misleads or hinders investigators inquiring into human rights violations may face penalties.

2. POLICY STATEMENT

Respect for human rights of Aura's employees, residents of communities where the Company operates, employees of contractors, suppliers and other stakeholders whose human rights may be directly impacted by the Company's operations, is an essential part of the Company's vision and values.

We are committed to conducting our operations in a manner consistent with the Universal Declaration of Human Rights ("UDHR"), the laws of home and host countries, the United Nations Guiding Principles on Business and Human Rights, the UN Declaration on the Rights of Indigenous People and the World Gold Council's Responsible Gold Mining Principles and Conflict-Free Gold Standard.

The Company:

- (a) respects human rights and is committed to treating individuals with dignity and respect, creating a healthy working environment.
- (b) identifies, prevents and mitigates adverse human rights impacts that are directly linked to the Company's operations, products or services by its business partners.
- (c) engages with external stakeholders to identify the most salient challenges for its projects and, in particular, in locations where exploration, development, construction and reclamation operations are taking place or are being planned and potential human rights concerns may exist.
- (d) seeks to consult and cooperate with communities and indigenous people about projects that affect their lands, resources and territories, in accordance with the United Nations Declaration of Indigenous Peoples and the principle of Free, Prior and Informed Consent.
- (e) incorporates human rights-related demands in contracts with business partners and host governments as appropriate.

- (f) recognizes that human rights risks are even greater in areas of weak governance, high conflict and endemic corruption; thus requiring heightened diligence in regard to stakeholder engagement and strategic social investment.

3. DEFINITION OF HUMAN RIGHTS AND FREE, PRIOR AND INFORMED CONSENT

Human Rights are defined as the fundamental rights that humans have by the fact of being human, and that are neither created nor can be abrogated by any government, company or other entity.

Supported by several international conventions and treaties (such as the United Nation's Universal Declaration of Human rights in 1948), these include cultural, economic, and political rights, such as right to life, liberty, education and equality before law, and right of association, belief, free speech, information, religion, movement, and nationality.

Recognition of this right includes respect for the rights of traditional communities and indigenous peoples expressed in the *UN Declaration on the Rights of Indigenous Peoples*; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; migrant workers and their families and other groups in a society whose situation may render them particularly vulnerable to adverse impacts on their rights.

For the purposes of the Policy, human rights are:

- (a) those internationally defined, recognized and identified in international conventions.
- (b) recognized by the: (i) *International Bill of Human Rights* (which includes the Universal Declaration of Human Rights); and (ii) the *International Labour Organisation Declaration on Fundamental Principles and Rights at Work*, in particular freedom from forced labour, the abolition of child labour, freedom to associate and organise and the right to collective bargaining, and the elimination of discrimination in employment and occupation.

In addition to the above definitions, the Company affirms and abides by the concept of Free, Prior and Informed Consent (FPIC). Aura endorses the UN High Commissioner for Human Rights concept of FPIC for all indigenous, local and traditional communities who live in the vicinity of mining projects.

4. RIGHTS TO BE RESPECTED

In carrying out this Policy, the Company is committed to:

- (a) securing fair working conditions and fair treatment for all our employees, which includes rights to freedom of association and collective bargaining, and forbidding forced, compulsory or child labor and human trafficking;

- (b) forbidding harassment and discrimination in all our activities;
- (c) respecting the resources, values, traditions and cultures of local and indigenous communities;
- (d) minimizing environmental impacts related to the Company's operations, including access to clean water, land and air, especially as it impacts health and livelihood.
- (e) avoiding damaging the right to livelihoods, including those whose livelihood has historically been reliant on artisanal mining or other local economies including agriculture;
- (f) operating with respect for human rights in post-conflict and weak governance zones;
- (g) ensuring that the Company does not engage in actions complicit with those of host governments, contractors, suppliers or partners that violate human rights.

5. RULE OF LAW AND CONFLICTING REQUIREMENTS

In all situations and contexts, and in all jurisdictions, the Company will comply with applicable laws, respect the rule of law and strive to respect internationally recognised human rights, especially when operating in countries where host governments are either unwilling or unable to effectively regulate business consistent with human rights principles. The Company will seek ways to honour the principles of internationally recognised human rights when facing conflicting or unclear requirements.

6. IMPLEMENTATION STANDARD

To implement and uphold this Policy, the Company will be guided by the *UN Guiding Principles on Business and Human Rights*. In addition, the Company will, in good faith:

- (a) integrate human rights due diligence into significant business processes as appropriate.
- (b) involve multi-stakeholder consultation from both internal and external stakeholders - including civil society groups and NGOs - to assist the Company in identifying negative impacts of its operations on the human rights of external stakeholders.
- (c) work to set up implementation protocols for this Policy and training tools consistent with the goals sought in this Policy (including, but not limited to, conveying the consequences for failure to comply with this Policy);
- (d) create grievance mechanisms that are accessible directly to individuals and communities who may be adversely impacted by the Company's business.
- (e) support appropriate remediation for proven adverse impacts caused by Company's actions.

- (f) regularly monitor (including conducting due diligence reviews), objectively report and transparently communicate human rights performance.
- (g) make this Policy publicly available, communicate the Policy effectively to all relevant parties and update it as necessary.

7. INTERACTION WITH OTHER CORPORATE POLICIES

Respect for human rights in accordance with this Policy requires adherence to other relevant Aura policies, including, but not limited to Code of Business Conduct and Ethics.

8. APPROVAL AND OVERSIGHT

This Policy has been approved by the Board of Directors of Aura Minerals Inc. and shall be overseen at the Board level by the Corporate Governance, Compensation and Nominating Committee.

Reporting on this Policy will be made annually in accordance with the Company's continuous disclosure obligations.