Troilus Mining Corp. - Sustainable Development Policy

At Troilus we are committed to creating value for our shareholders while operating in a safe, socially and environmentally responsible manner, contributing to the prosperity of our employees & their families, our service providers and our local communities while respecting human rights, cultures, customs and values of those impacted by our activities.

Accordingly, through our actions we endeavour to demonstrate a responsible approach to social, economic and environmental performance in all aspects of business strategy, planning and management that is aligned with the evolving priorities of our communities of interest. Our actions will reflect a broad spectrum of values that we share with our employees and communities of interest, including honesty, transparency and integrity.

Through this policy we are committed to:

- Identify and evaluate impacts in all aspects of our operation and ensure that effective controls, technologies and resources are in place to minimize, mitigate and eliminate risks;
- Promote leadership, personal commitment and accountability to this policy from all employees, and contractors;
- Comply with our internal governance policies, with our Code of Business Conduct and Ethics, with the laws and regulations in the jurisdictions in which we operate as well as other industry and sustainability standards to which our company subscribes;
- Uphold fundamental human rights as defined in the United Nations Universal Declaration of Human Rights, the United Nations Declaration on Rights of Indigenous Peoples and in the Voluntary Principles on Security and Human Rights;
- Maintain emergency and crisis response plans to address possible impacts of unforeseen events;
- Monitor the evolving ESG landscape and technological advances in mining to ensure continuous improvement and forward looking design to minimize and mitigate the impact of our activities over the life cycle of our projects;
- Build relationships with our stakeholders and rights-holders based on trust through open and transparent communication; and
- Ensure sufficient resources are allocated to implement and manage these commitments throughout the lifecycle of our projects and operation.

Our Employees & Contractors

We aim to maintain a productive and supportive work environment that is based on mutual respect, fairness and integrity.

Our commitments:

- No tolerance for discriminatory conduct or any type of harassment or abuse in the workplace;
- Value diversity and treat all employees and contractors fairly, providing equal opportunity at all levels of the organization without bias;
- Employ and promote employees on the basis of merit and provide appropriate and meaningful training and career opportunities to encourage employees to achieve their full potential;

- Provide fair and competitive compensation;
- Respect the rights of employees and contractors and not engage in practices of forced or child labour nor use suppliers that engage in such practices;
- Respect employees and contractors right to freedom of association and freedom to engage in collective bargaining;
- Provide a confidential reporting mechanism to report unethical, illegal or irresponsible behaviour by maintaining a Worker Grievance Mechanism that is publicly accessible through multiple channels and languages, has clearly defined procedures and response times, provides for anonymous reporting and non-retaliation and includes escalation to third party external mediation if needed;Maintain the confidentiality of collected personal and private information about employees; and
- Consult, communicate and provide appropriate support to employees so they can perform their work.

Environmental Stewardship

We aim to eliminate, minimize and mitigate impacts of our operations on the environment and maintain its viability and diversity.

Our Commitments:

- Integrate environmental considerations into all aspects of the Company's activities;
- Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation;
- Promote and implement the efficient use of resources, and practice conservation, waste minimization, safe disposal, reuse and recycling;
- Minimize risks associated with managing tailings, mine waste and water by employing best practices and rehabilitate sites to ensure long term physical and chemical stability in a consultative manner;
- Practice water conservation and management to reduce cumulative impacts on the surrounding environment and other land users;
- Implement measures to reduce the use of fossil fuels and greenhouse gas emissions to minimize the carbon footprint of our operations;
- Assess climate change risks and consider how these may impact our operating activities and plans for development;
- Integrate biodiversity conservation and land use planning considerations through all stages of our activities taking due care to prevent, manage and mitigate the impact of the Company's operations on surrounding habitat and minimize the impact on flora and fauna;
- Ensure that all employees, consultants and contractors understand the Company's commitment and fulfill their responsibilities for environment protection; and,
- Collaborate with local, national and international individuals, institutions, organizations and governments on measures to protect the environment.

Operating a Safe and Healthy Workplace

We aim to operate a safe and healthy workplace that is injury and fatality free. Our objective is to achieve zero accidents in the workplace and protect and enhance the well-being of employees, contractors and communities.

Our Commitments:

- Integrate health and safety into all aspects of our operational decisions and activities;
- Provide appropriate training for all employees to safely perform their duties and require that contractors (and their sub-contractors) provide their employees and service providers with the training and resources required to minimize the risks of their work activities;
- Maintain occupational health and workplace hygiene programs;
- Provide appropriate tools to work safely and efficiently;
- Use sound engineering principles in the design and operation of our facilities;
- Provide adequate emergency response resources, emergency exercises and related training and maintain a high degree of emergency preparedness to effectively respond to emergencies;
- Ensure that site access/permit systems are diligently and correctly used by all staff and contractors; and,
- Promote healthy lifestyles through appropriate awareness and training, fitness for work standards (including a drug and alcohol free worksite), and occupational health programs and benefits and encourage employees and contractors to initiate and participate in initiatives to promote good health.

Respect for our Local Communities

We aim to contribute to the social and economic development of sustainable communities associated with our operations to ensure a legacy of improvement that will continue beyond the life cycle of the mine.

Our Commitments:

- Foster an open, honest, transparent and respectful dialogue with all communities of interest through formal and informal channels to incorporate their values and concerns into our business activities and ensure that activities on private and indigenous lands are performed with the free prior informed consent of the land owners or right holders;
- Support local communities and their sustainability through measures such as development programs, locally sourcing goods and services, capacity building of local small and medium enterprises and employing local people;
- Provide assurance that our operations will not support, benefit or contribute to unlawful conflict, serious human rights abuses or breeches of international humanitarian law;
- Not to explore or develop our operations in any areas designated as World Heritage Sites;
- Avoid involuntary resettlement and where resettlement is unavoidable engage in meaningful consultation and compensation with impacted parties;

- Support social, educational, environmental and recreational programs that benefit our operating communities; and,

- Welcome community feedback and monitor and track any issues raised by local citizens by maintaining a Community Grievance Mechanism that is publicly accessible through multiple channels and languages, has clearly defined procedures and response times, provides for anonymous reporting and non-retaliation and includes escalation to third party external mediation if needed.

Respect for Indigenous Peoples

We aim to foster positive and collaborative relationships with local indigenous People focused on establishing mutually beneficial, cooperative and productive relationships.

Our Commitments:

Troilus supports the United Nationals Declaration on the Rights of Indigenous Peoples (UNDRIP) and commits to applying its standards and principles.

Troilus acknowledges the past treatment of Indigenous Peoples in Canada and recognizes the importance of reconciliation between Indigenous Peoples and broader society, including the mining industry, which operates in remote regions directly a part of Indigenous communities.

Troilus acknowledges that our Project is located on the traditional Cree territory in the Eeyou-Istchee/James Bay region of Quebec, and we respect the connection of Indigenous Peoples to this land and the environmental stewardship they have provided for millennia.

Troilus' commitment with respect to engagement with Indigenous Peoples is to:

- Recognize Indigenous People are free and equal to all others, and have the right to be free from discrimination;
- Recognize their right to self-determination, the autonomy of their self-governing bodies, their political, legal, social and cultural institutions and respect them, and coordinate appropriate dealings through them;
- Recognize the right to participate in decision-making matters that affect their rights through representatives chosen by themselves;
- Never condone genocide, acts of violence, or the removing of children;
- Respect their right to live in freedom, peace and security; their right to manifest, practice, develop, teach spiritual, religious traditions, customs and ceremonies; their right to maintain, protect, and have access in privacy to religious or cultural sites;
- Consult and cooperate in good faith with Indigenous Peoples concerned through their own representative institutions in order to obtain their free, prior and informed consent (FPIC) before implementing measures that may affect them;
- Where appropriate, provide effective and special measures to ensure continuing improvement of their economic and social conditions, especially vulnerable groups including Elders, women, youth, children, persons with disabilities; also, provide special care for these groups against violence and discrimination;
- Establish conservation and protection in affected areas, and ensure no storage or disposal of hazardous materials in lands or territories without FPIC;
- Prevent and provide redress for depriving them of cultural values or identities, or the dispossession of their lands, territories, or resources.