

**BEAR CREEK MINING CORPORATION**  
**(the “Company” or “Bear Creek”)**

**HEALTH, SAFETY, ENVIRONMENTAL PROTECTION AND SOCIAL RESPONSIBILITY POLICY**

**1. PURPOSE**

The Company strives to execute its business practices with a goal to achieving health, safety, environmental protection and social responsibility (“**HSES**”) and believes that visible leadership and accountability in these areas is critical to promoting a culture that reduces risks and improves the health and safety performance throughout the Company’s operations.

Our HSES objectives include, but are not limited to, promoting a positive culture of safety, sustainability and well-being to Company Persons (as defined below), the environment, and the communities in which we operate, striving for continuous improvement in our safety and environmental performance, and obtaining permits and approvals and maintaining material compliance with applicable laws and regulations. We are striving to fulfill each of these objectives in an effective and responsible manner.

We believe that mineral resource development can drive local economic prosperity and be a force for positive social change. The Company aspires to excel in environmental and social performance using management best practices and open and transparent communication

**2. SCOPE**

This policy applies to all directors, officers, employees, contractors, consultants, customers/clients, visitors, or members of the public at any Company workplace or work site (“**Company Persons**”).

**3. PURPOSE AND PROCEDURES**

**3.1 *Health and Safety***

Health and safety are core values at Bear Creek. We believe that efforts must be made to eliminate significant accidents and reduce minor incidents towards zero.

To be successful in promoting the objectives of this policy, all Company Persons are expected to undertake their work in accordance with these values to the best of their ability and take all reasonable care for their own health and safety, as well as the health and safety of their work colleagues.

**We will promote safe workplace and worksite operations by:**

- a. Operating in accordance with applicable industry standards, while complying with applicable laws in the jurisdictions in which we work.
- b. Providing the expertise, training and resources to maintain safe and healthy working environments.

- c. Supporting a culture of personal and professional responsibility that reinforces responsibility and accountability for health and safety.
- d. Adopting a Safety Management Plan at mining operations that provides for safety and environmental policies and protocol training, supervision and performance measurement and monitoring to employees and contractors.
- e. Investigating the details of material incidents and developing effective corrective actions to prevent reoccurrence.
- f. Supporting the right of Company Persons to refuse work that is deemed unsafe.

### **3.2 *Environmental Protection & Social Responsibility***

#### Environmental Protection

The Company is committed to striving for excellence in the management of environmental risks so our impacts are reduced and we seek to achieve a high level of environmental performance. The Company aspires to adopt best practices to prevent and mitigate the environmental impacts of our activities. Wherever possible, we look for opportunities to contribute to environmental stewardship initiatives.

#### Social Responsibility and Community Stewardship

The Company is committed to respecting the rights of all peoples, upholding human rights and contributing to improved quality of life and sustainable development in the regions and communities where we operate. We are committed to actively integrating Indigenous values into the Company's practices and plans.

#### **To meet our goal to excel in environmental and social performance, we strive to:**

- a. Protect opportunities for future generations by working to create a positive environmental and social legacy.
- b. 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.
- c. Engage with local communities, Indigenous peoples and other rights holders in an inclusive, respectful and culturally appropriate manner, early and throughout the life cycle of our projects and operations.
- d. Understand local interests, aspirations and concerns and explore opportunities to address these concepts where they align with the Company's.
- e. Protect archaeological and heritage resources within our project areas.

- f. Support diversity and inclusion in respect of employment and occupation, in accordance with our Diversity Policy.
- g. Educate our workers, and contractors working on our behalf, on environmental and community requirements and standards for our projects.
- h. Maintain an Environmental Management System that proactively identifies environmental risks and corresponding controls and mitigations, and facilitates a process of continual improvement and compliance with relevant environmental laws, regulations, permit requirements, standards and voluntary commitments through the mining lifecycle.
- i. Encourage environmental stewardship and awareness among all Company Persons.
- j. Report, investigate and remediate material environmental incidents.

#### **4. MONITORING AND COMPLIANCE**

The Company will regularly evaluate the compliance of this policy through periodic internal and external assessments and will report on performance in its sustainability-related disclosures.

We expect Company Persons to speak openly about any concerns to their supervisors or to raise them using one of the Company's grievance mechanisms, including through the mechanisms outlined within the Company's [Whistleblower Policy](#).

#### **5. REVIEW AND ENQUIRIES**

This policy will be reviewed annually by the Operations, Safety and Sustainability Committee ("**OSS Committee**").

Approved and adopted by the Board as of April 16, 2025.