



## HUMAN RIGHTS POLICY

This Human Rights Policy (the “**Policy**”) of District Metals Corp. (together with its subsidiaries, the “**Company**” or “**District**”) details specific principles and commitments concerning human rights and it applies to all directors, officers, employees and consultants of District (collectively, “**District Personnel**”).

While the Company recognizes that protecting human rights is primarily the responsibility of governments, it also recognizes that companies have a responsibility to respect the human rights of its stakeholders, including by conducting human rights due diligence and providing access to a remedy for potential and actual human rights violations.

This Policy sets out expectations of District Personnel in terms of upholding and respecting human rights. The Policy should be read in conjunction with the Company’s Code of Business Conduct and Ethics, which further outlines expected standards of behavior.

This Policy has been prepared in alignment with the United Nations Guiding Principles on Business and Human Rights.

### Human Rights Commitments

Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. Respecting human rights is a core value of the Company and is embedded in the way it does business. The Company upholds and respects human rights as reflected in the United Nations Universal Declaration of Human Rights, the International Labour Organization’s (“ILO”) Core Conventions, and the Canadian Charter of Rights and Freedoms.

The Company is committed to the following:

- **Compliance with laws.** The Company will comply with the laws, regulations, rules, and standards concerning respect for human rights of each country and region in which the Company conducts business.
- **Fundamental freedoms.** The Company supports the fundamental freedoms of District Personnel and of all individuals, including the freedom of thought, belief, opinion and expression, the freedom of peaceful assembly, the freedom of association and other rights and freedoms enshrined in the United Nations Universal Declaration of Human Rights and the Canadian Charter of Rights and Freedoms.
- **Labour standards.** The Company is committed to the fundamental labour standards and rights at work set out in the ILO’s Declaration on Fundamental Principles and Rights at Work. The Company will not employ any individual under the legal age of employment in any jurisdiction in which it operates or conducts business and will not use any forced, involuntary, compulsory, indentured or slave labour in any of its business activities or operations. The Company will provide wages and benefits that meet or exceed the requirements of applicable laws, rules, and regulations in the jurisdictions in which it operates and conducts business. Working hours, overtime hours, and number of working days per week will not exceed applicable legal limits. The Company recognizes freedom

of association and the right to collective bargaining in all jurisdictions of operation.

- **Safe and discrimination-free workplace.** The Company will maintain welcoming and supportive workplaces free from harassment and discrimination and otherwise managed in accordance with the Company's Anti-Discrimination, Inclusion and Diversity Policy. Such workplace environments will comply with applicable legal and regulatory health and safety standards and with the Company's Health and Safety Policy.
- **Human rights due diligence program.** When considering mergers or acquisitions, the Company will conduct appropriate due diligence, including pertaining to human rights issues. The Company will assess a company's human rights commitments, including relevant policies and whether they have been involved in human rights incidents. The Company will also consider whether projects are located on or adjacent to Indigenous Peoples' lands and whether the project is located in a jurisdiction that is subject to international sanctions and / or is considered to be in a jurisdiction with high levels of conflict as per the Conflict Barometer of the Heidelberg Institute for International Conflict Research. Human rights management programs will also be assessed, and ongoing monitoring of human rights performance will be conducted for both the Company and its business partners.
- **Engagement with stakeholders.** As specific issues relating to human rights are ever-changing due to social changes, industry trends or other factors, the Company will consult with its stakeholders regarding human rights and other social issues.
- **Continued improvement to policies and practices.** The Company will regularly review and assess its human rights policies, practices, and procedures.
- **Communications commitments.** The Company is committed to making District Personnel and other stakeholders aware of its human rights commitments and obligations.
- **Training and development.** The Company will organize appropriate training and educational programs for District Personnel to address any applicable human rights issues and to ensure proper implementation of this Policy in all of its business activities.
- **Application and responsibilities.** All District personnel are required to uphold the commitments and requirements set forth in this Policy and to support and respect the human rights of the Company's stakeholders.
- **Governance and Accountabilities.** The Board of Directors shall maintain Board-level oversight of this Policy. The CEO and CFO shall maintain senior management accountability for its implementation across the Company.

### **Review of this Policy**

The Board recognizes that Human Rights policy is an evolving area in Canada and globally and will review this policy on a regular basis, and annually at minimum, to ensure that it is effective in achieving its objectives and that the Company's practices continue to be representative of sound corporate governance practices.

### **Effective date**

This Policy was adopted by the Board of Directors on June 7, 2024.