



**WINSHEAR METALS CORPORATION**  
(the “Company” or “Winshear”)

**COMMUNITY POLICY**

*Adopted by the Board of Directors of  
Winshear Metals Corporation  
on February 26, 2021*

**PURPOSE**

Winshear is committed to sustainable development and recognizes that the long-term success of our business is dependent upon transparent and effective relations with the communities in which we operate. This policy describes how the Company manages to achieve and maintain such relationships.

**PRINCIPLES**

Winshear is committed to discovering and developing potentially economic new mineral resources, the development of which and production from which will benefit the communities within which they occur. If benefits are communicated properly, and with sensitivity to local concerns, this should lead to community support for Company operations.

We aim to establish sustained, transparent and meaningful engagement with the communities in which the Company operates. Such engagement requires open conversations about Company activities and community concerns that are managed to be proactive, monitored, two-way (speaking AND listening) and documented. Effective actions to mitigate issues of concern result.

**ACCOUNTABILITIES**

The Project Manager has overall responsibility for establishing an annual Community Action Plan appropriate to the stage of exploration and development of the project. In particular, managers will ensure that:

- Each project has an annual Community Action Plan formulated in consultation with the project staff and reviewed with the President of Winshear. The plan will specify at least:
  - The periodic community forums at which Company intent, plans and progress will be reviewed with the local community, and at which the Company will listen to and respond to community questions, complaints, and requests;

- The level of local hiring, payroll, and purchasing the Company will be making to execute the year's exploration/development plan;
- Specific key sustainable development needs of the community that the Company will consider for support at a level appropriate to the stage of the project.
- All employees, including employees of contractors, suppliers and consultants, treat our communities with respect, and communicate with our communities in a supportive manner;
- All visitors to the project site receive a community briefing upon arrival;
- They clearly define, communicate and consult with employees — including employees of contractors, consultants, and suppliers — and where appropriate, involve them in the development of practices and procedures aimed at improvement of Winshear's community presence;
- They collect data recording the occurrence of, investigation of, and response to community incidents and complaints and report them to the Company;
- They comply with all laws and standards established by appropriate federal, state, regional and local governments and agencies in the jurisdictions within which Winshear operates, respecting the community impact of our projects;
- They cooperate with government and community stakeholders on community issues and contribute to the development of relevant community policy, legislation, standards; and
- They inform contractors and visitors of this policy by posting it on the Company's website and at all project sites, requiring compliance from contractors and visitors to our projects and when performing work for us.

All employees are accountable to ensure that they:

- Do not start work until they understand what work is to be done and how to do it without causing unacceptable community impact;
- Are fully engaged in the Company's community engagement process. Engagement includes communicating with all the parties involved about community-related behaviours and conditions and bringing to management's attention those issues which require their involvement and support.
- Report all known or observed community issues to their immediate Manager or Supervisor.
- Report all community incidents, including such concerns as: injuries to community members arising from Project activities; significant impacts on community air and water quality arising from Project activities; or community action including protests and/or operational interruptions.

## **MEASURING COMMUNITY VALUE-ADDED**

Winshear measures the positive and negative impacts it has on the communities in which it operates by tracking:

- The number of national and local employees and contractors working on the project;
- Total payroll paid in-country and locally;

- Total goods and services purchased in-country and locally;
- Total taxes paid in-country and locally;
- Contributions made to local needs;
- Events planned in the Community Action Plan vs. those actually held;
- Number of safety incidents involving community residents, root cause investigation, and remedial action;
- Number of environmental incidents impacting air and water quality arising from Company activities, root cause investigation and remedial action undertaken.

All community safety or environmental incidents as defined above will trigger an investigation of the root cause, performance of remedial action, and the identification and implementation of an improvement to procedures to prevent occurrence of another incident with the same root cause. The Project Manager is accountable for conducting and documenting the investigation report.

The Company will communicate the facts related to community contribution to the Board of Directors at the end of each quarter. In addition, the Project Managers will notify executive management of serious incidents immediately and will provide their complete investigation report to executive management within 48 hours of discovering the incident.

## **COMPLIANCE**

Winshear will comply with all community impact laws and regulations in the jurisdictions in which we work, and shall consider compliance with the law to be the minimum standard by which the Company operates.

## **REPORTING**

Personnel are to report any observed negative community impacts and incidents to the Project Manager. The Project Manager will report all significant community incidents to the Company in monthly reports.

If any Personnel is uncomfortable with community conditions at any site, they are expected to advise the Project Manager. After bringing their concerns to the Project Manager, if the person remains unsatisfied with the response, they are encouraged to contact the President of Winshear and/or submit a Whistleblower complaint as described in the Winshear Whistleblower policy.

**Under no circumstances** will Personnel be disciplined for bringing concerns forward regarding community conditions.

## **CONSEQUENCES**

Failure to comply with this policy may lead to disciplinary action, up to and including termination of employment.

*End*