



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

**ENVIRONMENTAL 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 good stewardship of the environments in which we operate.

**PRINCIPLES**

Winshear is committed to discovering and developing potentially economic new mineral resources, with minimal lasting negative impact on the environment. Winshear aims to achieve this by employing the following principles:

1. In pre-permitting and pre-drilling mode, treading softly on the ground we are exploring, leaving minimal traces of our activities.
2. Obtaining all required permits to drill and/or perform other advanced development activities and managing our projects consistent with the requirements of those permits.
3. Formulating, communicating, and auditing performance of Standard Operating Procedures (SOP's) to complete key tasks or processes in an environmentally responsible manner while achieving the Company's development goals.
4. Complying with applicable environmental laws and regulations, and considering compliance with the law to be the Company's minimum standard. Our Personnel are responsible and accountable for compliance and have an obligation to bring issues forward to management for resolution.
5. Reclaiming surface exploration disturbances in alignment with local regulations and permits such that if no minable resource is established, the lasting impact of our exploration activities is minimized.
6. Should a potentially minable resource be established, planning the further development, permitting, construction, and operation of a potential mine using environmental best practices, consistent with local laws and regulations.

**ACCOUNTABILITIES**

The Project Manager has overall responsibility for establishing clear environmental

standards, processes and expectations for employees, contractors and visitors working at the site. In particular, all managers will ensure that the Company:

- Obtains relevant permits for activities at the project and operates according to those permits and other environmental regulations;
- Ensures that reclamation required by permits is performed;
- Reports all legally reportable environmental spills and other incidents during operations to both the local authorities and to the Board of Directors of Winshear;
- Manages environmental risk through the identification, elimination, monitoring and control of risk hazards while reviewing performance;
- Formulates and monitors Standard Operating Procedures for the environmentally correct use, handling, storage and transport of equipment and materials;
- Ensures that all employees, including employees of contractors, suppliers and consultants, are fully instructed, trained and assessed in the tasks each will be required to perform and in the operation of all plant and equipment each will be required to operate;
- Ensures that all visitors to the project site receive an environmental briefing program;
- Clearly defines, communicates and consults with employees — including employees of contractors, consultants, and suppliers — and where appropriate, involves them in the development of practices and procedures aimed at improvement of environmental performance;
- Collects data recording the occurrence of, investigation of, and response to environmental incidents and reports them to the Company;
- Complies with all laws and standards established by appropriate federal, state, regional and local governments and agencies in the jurisdictions within which it operates respecting the environmental performance of our projects;
- Cooperates with government and community stakeholders on environmental issues and contributes to the development of relevant environmental policy, legislation, standards; and
- Informs 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 or unnecessary environmental damage;
- Are fully engaged in the Company's environmental management process. Engagement includes communicating with all the parties involved about environmental-related behaviours and conditions and bringing to management's attention those issues which require their involvement and support.
- Report all known or observed environmental issues to their immediate Manager or Supervisor.
- Report all environmental incidents, including reportable events, spills, lost time injuries, medical treatment injuries, property damage, and near-misses to the Project Manager.

## **MEASURING ENVIRONMENTAL PERFORMANCE**

Winshear measures its environmental performance by tracking the incidence of significant

spills or discharges related to Company activities together with the root cause analysis underlying each incident and the remedial action taking to prevent recurrence. In addition, the Company will track the incidence of government reportable environmental occurrences, which may be a subset of all the incidents, together with the regulatory response.

All incidents as defined above will trigger an investigation of the root cause and identification and performance of remedial action to prevent occurrence of another incident with the same root cause. The Project Manager is accountable for conducting and archiving the root cause investigation reports.

The Company will communicate information related to the environmental performance to the Board of Directors at the end of each quarter or as determined by the Board of Directors. The number of incidents will be tracked. In addition, the Project Managers will report to executive management what happened, the root cause, and remedial actions to mitigate the root cause for each incident.

## **COMPLIANCE**

Winshear will comply with all environmental laws and regulations in the jurisdictions in which we work, and shall consider compliance with the law to be the minimum standards.

## **REPORTING**

Personnel are to report observed environmental hazards and environmental incidents to the Project Manager. The Project Manager will report all environmental incidents to the Company in monthly reports.

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

## **CONSEQUENCES**

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

*End*