

Human Rights and Freedoms Policy

Policy #: RM HR PWP 210

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1. PURPOSE

To provide the outline of Rambler Metals and Mining Canada Limited's expectations and legal obligations in respect to human rights and freedoms. As we hold ourselves to the highest standard, so all our employees, customers and suppliers are expected to meet or exceed the policy guidelines contained herein.

2. OVERVIEW

Respect for human rights and freedom is a fundamental requirement for the sustainability and success of Rambler. We are committed to ensuring that our employees, and all people, are treated with respect and dignity throughout the entirety of our business dealings.

3. RESPONSIBILITIES

Management/Employees/Suppliers/Customers:

All parties are expected to know and abide by the information contained herein and to be knowledgeable of the principles contained within the *Canadian Human Rights Act* and the *Canadian Charter of Rights and Freedoms*.

4. PROTECTION OF RIGHTS AND FREEDOMS

Discrimination

Discrimination is defined as the unjust or prejudicial treatment of different categories of people or things based on the following grounds:

| | | | |
|------------------|--------------------|-------------------|---------------------|
| Race | Nationality | Ethnic Origin | Social Origin |
| Religion | Age | Disability | Disfigurement |
| Sex | Sexual Orientation | Marital Status | Family Status |
| Source of Income | | Political Opinion | Reproductive Status |

Discrimination is a violation of our fundamental rights and freedoms and absolutely prohibited throughout every area of the business, including but not limited to:

- The recruitment process from advertising to hiring;
- Terms of employment such as equality of wages, eligibility of benefits, promotion and dismissal;
- Day to day operations in any Rambler work area or owned, rented or used properties;
- Discriminating against employees or potential employees due to any criminal charges or conviction unrelated to employment or due to an individual's wages being subject to attachment/garnishment.

Accommodation

Sometimes it may be required to treat an employee differently to ensure discrimination does not occur. Accommodation is a legal obligation to ensure steps are taken to eliminate different or negative treatment of any individuals, or groups of individuals to ensure that all practices are fair.

Accommodation is only required if a person or person's needs have been identified under the specific allowances of possible discrimination. If proven to be a valid concern, accommodation must be made, but not at the expense of undue hardship for other employees or the Company. The health, safety and wellbeing of all people associated, directly or indirectly, is of the utmost importance to Rambler.

Equal Pay for Equal Work

People have the right to be paid equal base wages to perform the same or similar work. Increases in wage beyond base amounts due to merit or seniority may be acceptable.

Harassment

Rambler is committed to providing a work environment free from harassment for all employees. We maintain a strict *Respectful Workplace Policy* (RM HR PWP-03) that prohibits harassment of anyone in places of employment based on grounds of discrimination as described above.

We do not tolerate behaviour in any form that may be likely to undermine the dignity or self-esteem of an individual, or which creates an intimidating, hostile or offensive environment.



Harassment may take any form, such as any printed material, e-mails, jokes, comments, pictures, messages or pictures on clothing; e-mails, web pages, threats, demands, bullying, remarks about a person's appearance or personal life, unwelcome sexual advances or anything that may be deemed as unwelcome by another person.

Rambler considers every issue that may be harassment in the workplace and performs a full investigation into the matter. If someone is found in violation, action will follow appropriate to the level of violation, from informal resolution to discipline, up to and including termination of employment and/or reporting to the authorities.

5. ETHICS IN BUSINESS

Rambler's *Code of Business Conduct & Ethics* outlines general guidelines for employees who represent and conduct business on behalf of the Company. Through this code of conduct we strive to exceed and promote the highest standards of ethical behavior and support full compliance to all applicable laws & regulations.

Rambler has also outlined our expectations and standards for ethics in our business dealings with our customers and suppliers in the *Ethics in Trade Policy* (RM HR PWP 270). This policy outlines our requirement for compliance in the areas of human rights, including all the above guidelines, with the addition of our commitment to not condone or conduct business of any type involving forms of forced servitude; labour; slavery; or human suffering. One of the most fundamental rights is the right to freedom.

Our suppliers and customers have the same responsibility to uphold and champion human rights as Rambler. We review and update these commitments and expectations annually and with each new business relationship. We require this ethical view and human rights value in all our business chain, without exception.