

Human rights policy

BUSINESS DIVISION OWNER

People and Workplace

OWNER

CEO, People Culture

FIRST CREATED

March 15, 2024

LAST UPDATED

July 4, 2024

BACKGROUND

Construction of the Human Rights Policy

Summit is comprised of a diverse set of people who bring our own experiences and identities and share the vision that the lithium industry needs leadership and innovative thinking. Based on this approach, Summit has been committed, since its foundation in 2018, in an integral way with the life cycle of its projects, especially considering its collaborators, and the people and communities where they materialize, to co-construct together a cleaner and more sustainable energy future for all.

In support of this commitment, in January of 2024, we began the process of consolidating the incorporation of the human rights approach in our sustainability strategy, through a concrete milestone: **the participatory construction of Summit Lithium Technologies' Human Rights Policy**. Following international standards in this area, with the encouragement of the founder and CEO of our company, we moved forward on this path with the development of a baseline regarding our human rights risks, especially considering those specific to the mining industry.

We also carried out a participatory process within the company to gather the concerns and expectations of our employees and some contractors regarding the management of these risks.

These processes informed and supported the construction of Summit's first Human Rights Policy, with a sense of belonging and specific adaptation to the development of our company. The Policy was approved by the company's highest governance body, the Executive Management Team, in early 2024.



Scope of policy

Our commitment to respect human rights, as well as the actions derived for their implementation, involves all the people who work in and for Summit, in all the company's facilities and places of operation, including our contractors, as well as our supply chain, customers and business partners, while complying with the national and local regulations of the states and territories in which Summit develops its projects and operations.

In the event that the host country's legislation does not recognize any of the international human rights standards, Summit Lithium Technologies will take all actions within its power to comply with the company's own standards. In such situations, Summit does not a priori rule out the possibility of no longer operating or investing in those locations.

This statement is further complemented by the provisions of our Code of Ethics and Conduct, as well as all our policies and procedures related to the matters addressed herein. These include the Health and Safety, Drugs and Alcohol, Staff Accommodation, Risk Management, Workplace Harassment Prevention and Workplace Violence Prevention Policies; the Contractor and Supplier Hiring Guidelines, and the Community Relations Policy.

Human rights policy

LAST UPDATED JULY 4, 2024

Summit Lithium Technologies is a people-centered company. We are inspired and driven by our commitment to respect the dignity of every human being, without exception, which is reflected in our HEARTS pillars – humility, empathy, adaptability, relentlessness, transparency, and safety.

At Summit Lithium Technologies we adhere to international human rights principles and standards, and we are committed to respecting all internationally recognized human rights, in particular those enshrined in the Bill of Human Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights); and the core conventions of the Labor Organization, in accordance with the ILO Declaration on Fundamental Principles and Rights at Work.

We embrace the United Nations Guiding Principles on Business and Human Rights, taking responsibility for respecting the human rights of those who work at Summit Lithium Technologies, our contractors and workers in the supply chain, local communities, and Indigenous Peoples, as well as all those potentially affected by our operations.

**Within this framework, we are committed to:**

- 01 **Avoid infringing, directly or through complicity, the human rights** of our collaborators, contractors, workers in the supply chain, and members of the communities in which we operate.
- 02 **Prevent and mitigate the negative impact** of our activities on the human rights of third parties and address the consequences by actively seeking redress.
- 03 **Establish an effective human rights risk management system**, including processes for the identification, evaluation, and prioritization of risks, the establishment of a compliance plan, and its permanent monitoring and follow-up.
- 04 **Establish an adequate and effective grievance and consultation mechanism**, associated with a reliable and transparent investigation process, allowing for appropriate redress where appropriate.

The responsibility to respect human rights is deployed and developed in our day-to-day activities through five main axes:





These are built and oriented based on internationally recognized human rights principles and standards, as well as those enshrined in other international instruments and guidelines applicable to the extractive mining sector to which Summit Lithium Technologies adheres and is committed:

- United Nations Sustainable Development Goals (SDGs).
- Global Compact Principles (2000).
- International Council on Mining and Metals (ICMM, 2023).
- ICMM Statement on Indigenous Peoples and Mining (2013).
- Performance Standards on Environmental and Social Sustainability (IFC Performance Standards).
- OECD Guidelines for Multinational Enterprises for Responsible Conduct (2023).
- TRM Standards (Towards Responsible Mining) of the Mining Association of Canada.

01 **Respect for human rights of workers**

Safe and healthy work environment

At Summit Lithium Technologies we believe that the only acceptable level is the complete and total protection of the health and safety of all our employees.

Eliminating discrimination in employment and occupation

People are at the heart of our company. We value diversity and promote inclusion. We believe in the unique value that each person brings to our organization, and we are committed to maximizing the capabilities and opportunities of each of them, based solely on the merit of our employees, their performance, contributions and experience. We are also committed to understanding and addressing any pay equity gaps we may have.

Freedom of association and the effective recognition of the right to collective bargaining

Our commitment to freedom of association, trade union freedom, and effective recognition of the right to bargain collectively is part of its adherence to the ILO's Decent Work Principles.

Elimination of all forms of forced or compulsory labor and effective abolition of child labor

At Summit Lithium Technologies, the fight against these abusive forms of employer power is a conviction. We follow industry best practices in ethical procurement in the conscious selection of our suppliers based on factors such as, but not limited to, the adherence to laws around applicable human rights (e.g. child labor laws, human trafficking, workplace health and safety, non-discrimination, treatment of employees, etc.).



02 Rights of people and communities in the territory

We have a particular commitment to human rights associated with mining activities.

Within this framework, we assume respect for the rights of the communities that inhabit the territory where our projects are developed, including their health, safety, right to water and the ownership or use of land and natural resources, in accordance with the Environmental and Social Sustainability Performance Standards (IFC Performance Standards).

As well as a commitment to the rights of Indigenous Peoples, within the framework of which we adhere to the principles and standards established in ILO Convention No. 169 and the United Nations Declaration on the Rights of Indigenous Peoples, in addition to complying with local regulations on citizen participation and community consultation, based on the principles of free, prior, and informed consent. For additional detail, please see our Community Relations Policy.

03 Supply chain

It is important to Summit Lithium Technologies that its business relationships with partners, clients, contractors, or suppliers in its supply chain are based on respect for human rights.

Every company that does business with us must adhere to the same principles that we adopt in this Human Rights Policy.

Of relevance in this area is our Procurement and Contracting Policy, as well as compliance with the Canadian “Combating Forced Labor and Child Labor in Supply Chains Act” (S-2011), also known as the Modern Slavery Act.

04 Governance of the policy

Commitment from the company’s top management

Supervision of the governance of the Policy is the responsibility of the Chief People Officer (who is part of the management team). The management of the Policy is the responsibility of the People & Culture area, which must report directly to the Executive Leadership Team every 6 months. Implementing the policy is the responsibility of all areas of the business, according to the respective actions and responsibilities.

Annual evaluation

In the framework of the annual Policy report, the Executive Management Team will review the Policy and assess the need to update or modify it, according to the risk analysis presented and discussed at the time.



05 Access to remedy

We recognize that, even with a robust human rights risk management system in place, our operations may eventually cause, or contribute to causing, an adverse impact on the rights of individuals, employees, or communities with which we interact. In such cases, Summit Lithium Technologies is committed, when made aware, to work to remedy, or contribute to remedy, the impact caused.

Grievance and consultation mechanism

We have a public and transparent mechanism for receiving complaints and inquiries – and we are committed to addressing complaints and requests in a timely manner, and to remedy them appropriately as soon as possible.

This mechanism allows us to receive complaints and queries from our own employees, as well as from third parties – in particular, customers, contractors, suppliers and communities.

Policy implementation

We commit to addressing the commitments adopted in this Policy, in a progressive manner, through:

- The communication and dissemination of the Policy and the commitments derived from it.
- The incorporation of the human rights approach into the company's culture and risk management system, through training and the review of the associated policies and procedures.
- Continuous monitoring and evaluation of the Policy, including collaborative feedback, regarding areas for continuous improvement.

We recognize that human rights risk management is a continuous work in progress, which requires not only conviction but also resources and availability to make concrete progress in the actions to which we are committed.

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