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|  BRAZILIAN NICKEL | Security Policy | | |
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Security

I. PURPOSE

This policy provides a framework to ensure that Brazilian Nickel (BRN) Group maintains an effective security function and manages the security of its operations in a consistent manner to protect our people, operations, products, assets, and reputation, as well as the communities in which we operate.

II. SCOPE

This policy is endorsed by the BRN Board and Executive Management, and applies to:

- BRN and all areas of Group operations including all Local Operating Companies, and other projects and offices where BRN has a controlling influence.
- All employees of BRN or any of its subsidiary companies, including temporary staff and any personnel included in agreements with partners, suppliers, contractors, subcontractors, consultants and other third parties
- All aspects of our business (where we have control &/or influence) associated with our normal, abnormal and emergency activities including, but not limited to: exploration activities, project development and operations, management of assets, supply of raw materials and services, delivery to customers, transport of personnel, emergency response, and project decommissioning.

III. POLICY STATEMENTS

The effective Security of BRN operations, assets, activities, and personnel is fundamental to the continued growth and success of the Group.

BRN will comply with or exceed all applicable laws, regulations, and standards of the countries in which we operate and will comply with all other requirements and standards to which we subscribe including the Voluntary Principles on Security and Human Rights¹. Where these cover the same subjects we will comply with the more stringent requirements.

We will assess and document the security risks associated with each project and operating environment and evaluate likely impacts on our company and the local community (including the risks of our security arrangements on the local community). We will regularly consult with governments, security firms, other companies, multilateral institutions, and local communities regarding security risks and issues including the impact of our security arrangements.

¹ <https://www.voluntaryprinciples.org/>

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We will establish gender and culturally appropriate preventive and defensive security strategies, plans, standards, policies, and procedures to manage security risks effectively and protect our employees, assets, and shareholders from loss from theft, fraud, and other inappropriate activity. We will be prepared to respond to security incidents with appropriate and tested response plans that are proportional to the threat and will use proven technology to increase the reliability and effectiveness of our security operations.

BRN will engage appropriate security expertise (private or public in compliance with local laws) and provide the resources necessary to develop and maintain a safe and secure working environment. We will maintain a high degree of professionalism, knowledge, and integrity, among security staff with appropriate recruiting, human rights and security training, resources, and contracting procedures. Organisations or individuals implicated in human rights abuses will not be permitted to provide security services. The use of force will only be permitted in a preventive and defensive context and will always be proportionate in nature, and security personnel will be trained in the proportionate use of force, and will be unarmed.

BRN will document, investigate, analyse and if appropriate report all security incidents and any allegations of human rights abuses by our security staff and will take appropriate action to prevent re-occurrence and continuously improve.

This Policy will never be compromised for the sake of operational convenience, productivity, costs, or profitability.

IV. POLICY REQUIREMENTS

The following requirements will be met:

- This Security Policy will be communicated, understood, and applied throughout BRN;
- The Board and Executive Management of BRN as well as other top and local management teams will make a personal commitment to ensure the implementation of this policy;
- All locally developed security management systems and operations will comply with this BRN policy;
- The security risks of all projects and activities will be considered at all stages of their development (from inception, design, implementation, expansion, and decommissioning) and policies and plans developed to effectively eliminate, mitigate and/or compensate the identified risks.
- BRN will ensure that none of its security activities contribute towards local conflicts or human rights violations;
- The security performance of our partners, contractors and sub-contractors will be managed to standards equivalent to our own. Security performance will be considered when selecting contractors and suppliers;
- BRN will engage and consult with local communities in a fair, timely and culturally appropriate way and will investigate and address and all security related issues within an appropriate timeframe. BRN will establish and publicise a Grievance Mechanism for the reporting and investigation of community related complaints. All community and social incidents, grievances and issues will be and investigated to identify root causes and prevent a recurrence. All deficiencies will be corrected within an appropriate timeframe;
- We will regularly assess, monitor, audit and enforce our security performance and policies and will provide the technical and financial resources and capabilities necessary for their successful implementation and improvement;
- We will report externally on our security performance and encourage dialogue with local communities and other stakeholders to promote community and social awareness.

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