



Doc ID: BRN_POL_Community & Social	Issue Date: February 2014	Revision Date: November 2021	Status Active
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Community and Social

I. PURPOSE

This policy provides a framework to assure that Brazilian Nickel (BRN) Group creates strong and sustainable economic and social opportunities, and respects, protects, and strengthens the host communities where it operates.

II. SCOPE

This policy is endorsed by 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 interactions with local communities potentially affected by our operations, during the life, and at the end, of our projects. Interactions include, but are not limited to: The employment of local workers, the use and/or engagement of local companies and services, impacts on local land and resources caused by our mining and other associated activities, use of local infrastructure such as road and rail networks, impacts on local health and healthcare services, the establishment of local community and social projects etc.

III. POLICY STATEMENTS

The successful integration of BRN with the local communities in which it operates is fundamental to the continued growth and success of the group.

BRN will uphold ethical business practices, respect, and protect the fundamental human rights of its employees, host communities and other stakeholders. We will respect the rights of indigenous and tribal peoples and communities and value cultural heritage, and will work to the protection and sustainable enhancement of the host communities and local economies in which we operate.

Our stewardship of and relations with local communities should be such that they consider BRN to be a good neighbour and a responsible business.

We 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. Where these cover the same subjects we will comply with the more stringent requirements.

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 Community and Social Policy will be communicated, understood, and applied throughout BRN;
- The Directors 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 and will build a relationship of trust and co-ownership, and work in partnership towards the sustainable development of the local community;

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- All locally developed Community and Social management systems and projects will comply with this BRN corporate policy;
- The corporate and local management teams will develop positive relationships with local communities through transparent and honest behaviour, effective communication, and regular consultation about project impacts;
- The community and social impacts of all projects and activities will be considered at all stages of their development (from inception, design, implementation scale up and decommissioning) to effectively eliminate, mitigate and/or compensate the negative community and social impacts and, where possible, build on and create positive opportunities through the development of appropriate policies and practices;
- As a minimum BRN will ensure that none of its projects contribute towards local conflicts or human rights violations;
- The community and social performance of our partners, contractors and sub-contractors will be managed to standards equivalent to our own. Community and social 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 throughout each project cycle;
- BRN will establish and publicise a Grievance Mechanism and a point of contact for community and social grievances. All community and social incidents, grievances and issues will be recorded, communicated, and investigated to identify root causes and prevent a recurrence. All deficiencies will be corrected within an appropriate timeframe;
- BRN will regularly assess, monitor, audit and enforce our community and social 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 and social performance and encourage dialogue with local communities and other stakeholders to promote community and social awareness.

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