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Health Safety & Environment

I. PURPOSE

To provide a policy framework to assure that the Brazilian Nickel (BRN) Group will provide a safe and healthy working environment and ultimately attain the goal of zero harm to our employees, their families, our business partners and customers, and the communities, and environment in which we operate .

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 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, supply of raw materials and services, delivery to customers, emergency response, and project decommissioning.

III. POLICY STATEMENTS

This Health, Safety and Environmental Policy is the foundation on which BRN will build and sustain world-class Health, Safety and Environmental performance. This is fundamental to the success of our Company. The Board and Executive Management are fully committed to this Policy and will exercise effective leadership through their personal example. We require all those covered by this policy to fully and enthusiastically implement and comply with the policy requirements.

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

BRN will afford the highest priority to Health, Safety and Environmental protection with the goal of zero harm to, and the avoidance of loss and damage to the assets of, our employees, their families, the environment, and the communities in which we operate.

We will protect the health and the safety of everyone we encounter during our operations be they employees, contractors, suppliers, visitors, or members of the public. Our stewardship of Health, Safety and Environmental matters will be such that they consider BRN to be a good neighbour and a responsible business.

We will conserve and, where possible, enhance the natural environment at and in the vicinity of our operations, and incorporate best engineering practices to minimise and mitigate our environmental impacts, and conserve natural resources.

We will comply with all applicable laws, regulations, and standards of the countries in which we operate, and will also comply with all other health, safety and environmental requirements and standards to which we endorse and to which we commit to. Where these cover the same subjects we will comply with the more stringent requirements.

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We will strive for continuous improvement in all aspects of Health, Safety, and Environmental performance through the establishment of challenging health, safety and environmental objectives and targets and the implementation of our corporate Health, Safety, and Environmental (HSE) management system designed to support this Policy.

IV. POLICY REQUIREMENTS

The following requirements shall be met:

- This Health, Safety & Environmental policy will be communicated, understood, and applied throughout BRN;
- All employees, partners, suppliers, contractors, subcontractors, and other relevant third parties will make a personal commitment to ensure the implementation of this policy and we will build a relationship of trust and co-ownership to achieve this;
- We will develop and implement a risk-based HSE Management System, based on the systematic identification and control of all relevant HSE hazards and risks. This will include the development of BRN corporate HSE management Principles and Codes.
- All locally developed HSE management systems will comply with these BRN corporate requirements. We will ensure that all managers, employees, and contractors are trained and competent to implement these systems.
- Roles, responsibilities, and authorities for Health, Safety and Environmental management will be assigned and we will communicate, educate, train, and motivate our employees and require their active participation in maintaining and improving our Health, Safety and Environmental systems and standards;
- All new projects, processes, and activities will be evaluated at each stage of their development to effectively manage and where possible improve their Health, Safety and Environmental characteristics;
- The Health, Safety and Environmental performance of our partners, contractors and sub-contractors will be managed to standards equivalent to our own. Health, Safety and Environmental performance will be considered when selecting contractors and suppliers;
- All incidents, whether injury or damage occurs or not, and other excursions (e.g. environmental degradation or community loss) will be recorded, communicated, and investigated to identify root causes and prevent a recurrence. All deficiencies will be corrected within an appropriate timeframe;
- We will assess, monitor, audit and enforce our Health, Safety and Environmental management systems and provide the technical and financial resources and capabilities necessary for their successful implementation and improvement;
- Regulatory authorities will be provided with relevant information to assist them in taking well-founded Health, Safety and Environmental decisions;
- We will report externally on aspects of our health, safety, and environmental performance and encourage dialogue with employees, local communities, and other stakeholders to promote health, safety, and environmental awareness.

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