



Hycroft Mining Holding Corporation
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HYCROFT MINING HOLDING CORPORATION ("Hycroft" or the "Company")

Sustainability Policy

Introduction

The Company is unconditionally committed to the highest standard of environmental, social and governance ("ESG") compliance. Hycroft has a corporate responsibility to operate in a responsible manner and the obligation to ensure the integration of ESG disciplines in our daily business planning and decision making.

Health and safety, environmental stewardship, human rights, fair labor practices, good governance and respect for our communities are the foundation of Hycroft's ESG program. Transparent demonstration of these disciplines is the catalyst to the Hycroft culture and our corporate values.

1. Objective and Scope

On recommendation of the Sustainability Committee, the Board has adopted this Policy to:

- Define Hycroft's commitment towards sustainability and responsible mining;
- Educate and inform Hycroft's employees, contractors, business partners and other stakeholders on environmental, social and governance (ESG) considerations and support their accountability and participation on those topics; and
- Ensure that sustainability processes are integrated into all activities within Hycroft.

2. General Principles

Successful ESG performance requires that we are conscientiously aware of how our business operations may have a potential impact on society and the environment. Recognizing the potential impacts and appreciating the associated risks, Hycroft endeavors to eliminate any potential impact through transparent, collaborative, and civil engagement with the community in which we operate and with all stakeholders.

(a) *Health & Safety practices* are integral to the protection of our team and sustainable operational success. Health & safety management standards that we adhere to every day are critical to ensure the wellbeing of our team and our success. Hycroft will operate compliantly while applying the highest standards; we expect the unconditional cooperation from every Hycroft employee and contractor to:

- Maintain a work environment that is healthy & safe, assessing and eliminating potential risks.

- Unconditionally embrace and demonstrate the Hycroft Health & Safety disciplines and standards.
- Maintain transparent engagement with the enforcement community and stakeholder communities.
- Practice Responsible Mining through effective management of health & safety.
- Operate at the highest level of health & safety integrity.
- Transparent communication to Hycroft employees and our community.
- Training and continuous engagement with the team to ensure our health & safety objectives and goals are exceeded every day.

(b) ***Environmental practices*** are a fundamental component to our operational success and sustainability goals. The environmental management standards that we adhere to every day are critical to ensure we operate compliantly while applying the highest standards. We expect the unconditional cooperation from every Hycroft employee and contractor to:

- Maintain compliance with all State and Federal regulatory and statutory requirements.
- Maintain transparent engagement with the regulatory community and stakeholder communities.
- Practice Responsible Mining through effective management of our environmental impacts.
- Report all environmental hazards and incidents immediately.
- Compliance with Hycroft operational policies, procedures and management standards.
- Transparent communication to Hycroft employees and our community.
- Operate at the highest level of environmental integrity.

(c) ***Human Rights*** are essential to our engagement of our employees and business partners. Hycroft endeavors to avoid infringement on human rights either directly or indirectly through our business relationships by strict adherence to:

- Recognizing and avoiding human rights risks.
- Implementing Hycroft human rights performance standards consistent with internationally accepted standards.
- Ensuring all employees and contractors of Hycroft are provided appropriate human rights training and guidance.
- Operate in compliance with all laws associated with human rights and meet the underlying principles of the human rights standards.
- Ensure appropriate access to effectively satisfy any adverse impact.
- Establishing effective grievance avenues for Hycroft employees, contractors and for the community in which we operate.

- Managing and reporting on Hycroft’s performance in implementing the Human Rights Policy.

Hycroft will ensure that all employees, contractors, and associated personnel understand their obligation and responsibility to:

- Unconditionally comply with all Hycroft policies and procedures related to the respect and protection of human rights.
- Report immediately any adverse incident related to human rights.
- Strictly adhere to our cultural behavior, respecting our employees, the community, and the human rights of all.

(d) ***Governance practices*** will ensure our people are appropriately protected, informed, trained and aligned to achieving our Sustainability objectives. The Hycroft Sustainability Policy is supported by our value-based culture and social performance principles including:

- Ensure the health & safety of all Hycroft’s employees and site visitors.
- Responsibly operating to the highest standard.
- Strict adherence to business ethics compliance and governance.
- Unconditional commitment to Hycroft’s human rights policy and performance standards, consistent with internationally accepted standards.
- Recognition and appreciation for diversity and ensuring that all groups have open access to information and ability to communicate concerns.
- Respect the community of which we employ and the community in which we operate through a transparent, collaborative and fully engaged process.

3. Authority & Compliance

The Company’s Chief Executive Officer and the Company’s environmental and sustainability manager shall be responsible for the implementation and adherence to this Sustainability Policy both within its corporate endeavors and at its operating locations.

Hycroft expects that all its employees, contractors and business partners apply the same principles and duty of care and comply with this policy, our Code of Business Conduct and Ethics, and other corporate policies complementing our engagement towards our sustainability principles.

Failure to comply with any aspect of this policy may result in disciplinary actions in accordance with relevant Hycroft policies and procedures.

4. Review of Policy

The Committee shall review annually this Policy and recommend appropriate changes to the Board.

5. Queries

If you have any questions about how this Policy should be followed in a particular case, please contact the Chief Executive Officer, the Vice President, General Manager or a member of the Committee.

Dated: February 19, 2023

Approved by: Nominating and Governance Committee
Board of Directors