



Human Rights Policy

Dated as of October 29, 2014

1. Overview

Minera Agua Rica Alumbreira Limited, including its controlled subsidiaries (“MARA”), is committed to conducting business according to the letter and spirit of the law and the high standards of ethical business conduct reflected in our Code of Conduct and Corporate Governance Policies (the “Code”), as well as those standards reflected in our internal management, human resources and other policies (the “Internal Policies”). This Human Rights Policy (the “Policy”) consolidates the ethical principles related to human rights that MARA uses to conduct its business activities.

Many of the ethical principles set out in this Policy were previously established in: the Code; the Internal Policies; or as a matter of practice through MARA’s day-to-day business activities. Along with consolidating these principles under this Policy, MARA has also expanded upon our current practices with respect to human rights to ensure that they continue to align with MARA’s standards of ethical business conduct and recognized best practices.

While this Policy recognizes that governments have the primary responsibility to protect human rights, MARA is committed to its corporate responsibility to respect human rights of individuals affected by its business activities. This Policy applies to MARA and all individuals that represent MARA including directors, officers, employees, contractors or consultants (collectively, “MARA Personnel”).

2. Purpose

The purpose of this Policy is to ensure that MARA and all MARA Personnel: understand their obligations and responsibilities with respect to human rights by consolidating MARA’s human rights principles under this Policy; can meet these obligations over the course of MARA’s day-to-day business activities; and are provided guidance with respect to their human rights responsibilities. This Policy mandates that MARA operate in a way that respects the human rights of all MARA Personnel and the communities in which it operates.

3. Respecting Human Rights

To meet its responsibilities to respect the human rights of all individuals, MARA makes the following commitments:

1. Child and forced labour will never be part of MARA's business activities.
2. MARA does not accept any form of discrimination with regard to race, colour, creed, religion, age, gender, disability, national origin, citizenship status, marital status, sexual orientation, social class, union membership, political affiliation, or physical characteristics.
3. MARA respects the rights and dignity of all individuals and is committed to maintaining a work environment free of discriminatory practice of any kind.
4. MARA adopts fair employment practices, in respect of each region in which it operates, and is committed to complying with applicable laws pertaining to freedom of association, collective bargaining, immigration, wages, hours of work and benefits.
5. MARA is committed to protecting the health and safety of all individuals affected by its business activities.
6. MARA does not belong to any political party, and will not use MARA or its resources to influence the political choices of individuals.
7. MARA respects the communities in which it operates, prioritizes the hiring of qualified local residents for its activities and is committed to developing programs aimed at improving the quality of life and sustainability of the community.
8. MARA recognizes that non-governmental organizations have a role in improving the quality of life in communities in which it operates. MARA seeks to work with non-governmental organizations to support projects aligned with its programs in partnership with local communities.
9. MARA is committed to designing environmental programs that minimize negative impacts while maximizing the sustainability of the environment for future generations.
10. MARA respects the rights and traditions of indigenous people and seeks to protect their cultural and spiritual heritage, as well as the environment.
11. MARA will act in accordance with the Voluntary Principles on Security and Human Rights and will require the same adherence from direct hire security personnel and from private or public security providers with which it is affiliated.
12. MARA has established several human rights grievance mechanisms, including but not limited to an internal integrity helpline, that all individuals can access, which also provides MARA with information to enhance its compliance program and implement performance improvement action plans.

MARA's commitment to respect human rights is also informed by international law, standards and best practices, including those set out in the following:

- ILO Convention 29 on Forced Labour
- ILO Convention 87 on Freedom of Association and Protection of the Right to Organize
- ILO Convention 98 on Right to Organize and Collective Bargaining

- ILO Convention 100 on Equal Remuneration
- ILO Convention 105 on Abolition of Forced Labour
- ILO Convention 111 on Discrimination (Employment and Occupation)
- ILO Convention 138 on Minimum Age
- ILO Convention 169 on Indigenous and Tribal Peoples
- ILO Convention 182 on Worst Forms of Child Labour
- International Convention on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises
- Organization for Economic Co-operation and Development Principles of Corporate Governance
- Voluntary Principles on Security and Human Rights
- United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials
- United Nations Code of Conduct for Law Enforcement Officials
- United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework
- United Nations Declaration on the Rights of Indigenous Peoples
- Universal Declaration of Human Rights