



ESG Policy

Summary

This Policy sets out the guiding principles that **Bedrock-Service** follows with respect to environmental protection, social responsibility, and excellence in corporate governance.

Bedrock-Service is committed to embedding the principles of environmental protection, social responsibility, and strong governance throughout its operations. This Policy sets out the Corporation's guiding principles in a clear and systematic manner to inform stakeholders, including employees, vendors, suppliers, communities, investors, and other interested parties, and to support the Corporation's decision-making and public reporting. The principles, commitments, and standard operating procedures described in this ESG Policy will continue to evolve as the Project advances and as the Project moves through its various phases, including pre-construction, construction, remediation and restoration of historical mining operations, operations, final restoration, reclamation and closure, and monitoring.

Guiding Principles

We are guided by the following principles in our approach to responsible mineral development:

- Bedrock-Service's objective is to leave the Project site in better condition than it was found and to create a lasting legacy of economic benefit for the surrounding region.
- Bedrock-Service recognizes that responsible corporate conduct with respect to environmental, social, and governance matters can contribute positively to long-term financial performance.
- Transparent disclosure enables stakeholders and other interested parties to better understand, evaluate, and assess risk and return, including the potential impact of ESG factors on the Corporation's performance.
- The Corporation's investment analysis should incorporate ESG factors to the extent that they affect risk and return.
- Bedrock-Service recognizes the respective roles and responsibilities of shareholders, directors, and management in corporate governance.

ESG Policy

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Bedrock-Service's commitment to ESG is reflected in the policies and commitments set out below.

GOVERNANCE

Corporate Board Structure

As a publicly traded company, Bedrock-Service is committed to maintaining the highest standards of corporate governance. The Corporation's Board of Directors fulfills its mandate through its four committees, which meet regularly or as required.

The following committees support the Board in carrying out its responsibilities:

- Audit Committee
- Compensation Committee
- Corporate Governance and Nominating Committee
- Technical Committee

Code of Conduct & Ethics Policy

Bedrock-Service's commitment to ethical and honest business conduct is grounded in its core values, which define who we are as a Corporation and guide how we behave.

Our values include compliance with environmental, health, and safety laws and regulations; dignity and respect at both the individual and corporate level; sustainable growth; strong social responsibility to the communities in which we operate; transparency through open and honest communication; accountability at all levels; and continuous improvement of operational practices.

To live up to these principles, Bedrock-Service has established core values that are integral to the Corporation's objectives, decision-making, and success:

- **Safety** – The health and safety of our employees, contractors, and the public is of the utmost importance.
- **Environmental Responsibility** – We comply with all environmental laws applicable to our operations and seek to exceed minimum requirements where practicable; we strive to identify practical solutions that support growth while protecting and enhancing the natural environment.
- **Community Involvement** – As an active member of the community, we strive to serve community needs and contribute to shared prosperity and well-being.
- **Transparency** – We fulfill our commitments openly and transparently. We aim to be accurate, consistent, and straightforward in all information provided to our stakeholders.
- **Accountability** – Our governance framework is designed to support accountability in our actions, decisions, conduct, and reporting.
- **Integrity & Performance** – We hold ourselves to high standards and strive to fulfill our commitments in an effective and sustainable manner.

All employees, as well as the Board of Directors, are required to know and follow the Code of Conduct and Ethics Policy (the “Code”).

All employees must carefully review and become familiar with the Code and confirm, either electronically or by signed acknowledgement, that they understand and agree to comply with it. Employees may be required from time to time to participate in mandatory training on the Code and reaffirm their understanding of it.

Bedrock-Service holds its managers and supervisors to the highest ethical standards and expects them to lead by example and help create a culture of trust that encourages questions and concerns.

Managers and supervisors are expected to promote understanding of the Code among the employees who report to them, as well as their understanding of all other rules, regulations, laws, and internal policies applicable to their roles.

Anti-Bribery, Anti-Corruption

In keeping with its commitment to conducting business transparently, honestly, and with integrity, Bedrock-Service will conduct its business in accordance with applicable laws, including Canadian and U.S. anti-bribery and anti-corruption laws. The Anti-Bribery and Anti-Corruption Policy applies to all directors, officers, employees, consultants, agents, and any other person acting on behalf of the Corporation.

Bribery is the most common form of corruption and may be broadly defined as the offering, promising, giving, accepting, or soliciting of an advantage as an inducement or reward for

an action that is illegal or constitutes a breach of trust. Bribery and corruption can take many forms, and the policy outlines what is and is not permitted.

This policy applies to all directors, officers, employees, consultants, agents, and any other person acting on behalf of the Corporation.

As part of this commitment, the Corporation's Compliance Officer is responsible for monitoring the effectiveness of this policy and may establish a management Compliance Committee. Internal control policies are established by the Compliance Officer, and a review is submitted to the Corporate Governance Committee of the Board of Directors on an annual basis.

Workforce Growth and Retention Policy

Our human capital is our most valuable asset. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees contribute represents a significant part of both our culture and our reputation.

Bedrock-Service is committed to attracting and retaining a talented workforce from all backgrounds and to fostering, cultivating, and preserving a culture that respects all individuals and values the variety of talents, perspectives, and experiences they bring to the Corporation, its Board, and its Executive Officers or Senior Management. This commitment includes non-discrimination based on protected traits.

For purposes of this policy, protected traits include, but are not limited to, age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, race, religion, sexual orientation, veteran status, and other characteristics protected by applicable law.

Bedrock-Service is committed to non-discrimination in all aspects of employment, including recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on mutual respect. This includes:

- respectful communication and cooperation among all employees;
- teamwork and employee participation, allowing for the representation of all groups and employee perspectives;
- work/life balance through flexible work schedules to accommodate employees' varying needs; and

- employer and employee contributions to the communities we serve to promote a workforce with the skills and experience needed to successfully operate a modern mine.

Political Contributions

Bedrock-Service supports corporate citizenship initiatives in the communities in which it operates. We encourage employees to be active in civic and community activities, including participation in the political and democratic process. As a company, Bedrock-Service encourages sound public policy that supports our mission and values.

All political lobbying and civic activity by the Corporation and its employees must comply with applicable laws and regulations. Any support for candidates by the Corporation is overseen by Bedrock-Service's Anti-Bribery and Anti-Corruption Policy and must comply with applicable law, including the Idaho Sunshine Law governing lobbying and political giving. Political giving by Bedrock-Service is made publicly available through the Idaho Sunshine Law. U.S. federal law prohibits corporations from making political contributions to federal candidates or party committees, but corporations may establish political action committees funded solely through voluntary employee contributions.

Political contributions are subject to regular review under Bedrock-Service's Anti-Bribery and Anti-Corruption Policy, and an annual report is submitted to the Board of Directors.

Supplier Standard

We recognize the important role suppliers and contractors play in achieving our environmental, social, and governance goals. Accordingly, prior to the commencement of construction and operations of the Project, Bedrock-Service will develop and implement a Supplier Code of Conduct ("Supplier Code") to set out the standards expected of all suppliers that wish to do business with, or on behalf of, the Corporation.

Bedrock-Service will apply a purchasing preference that favors suppliers with strong policies. Purchasing preferences will vary depending on the specific circumstances of each purchasing scenario.

Bedrock-Service defines "Suppliers" as businesses or individuals that provide goods or services to Bedrock-Service under the terms specified in a contract.

The Supplier Code will include expectations relating to:

- **Business Integrity and Ethics** – including anti-corruption and anti-bribery requirements;
- **Environmental Management** – including requirements for environmental responsibility and compliance with all applicable Bedrock-Service environmental standards and legal and regulatory requirements;

- **Health & Safety** – including compliance with all applicable Bedrock-Service, legal, and regulatory requirements for site and workplace policies, standards, and procedures related to health and safety;
- **Human Rights and Labor** – including respect for fundamental human rights, respect for the labor rights of all employees, non-discrimination in employment, and prohibition of forced labor, compulsory labor, child labor, and discrimination; and
- **Social Responsibility** – including the expectation that suppliers maintain positive relationships with stakeholders and local communities.

This policy applies to all contractors, vendors, and suppliers engaged by Bedrock-Service at the commencement of construction.

Transparency & Reporting

As awareness of environmental, social, and governance matters has grown among investors and other stakeholders, a number of internationally recognized reporting standards have been developed. As global acceptance and standardization of reporting continue to evolve, Bedrock-Service will align its primary ESG reporting with internationally recognized standards to improve transparency and accountability while preserving the integrity of its performance reporting.

As the Project moves through the various phases of initial site cleanup, construction, operations, reclamation, and closure, different elements of reporting standards will be used to track the Project's performance against our core values.

ENVIRONMENTAL

Conservation Principles

Given the importance of environmental protection in the development, operation, and closure of natural resource projects, Bedrock-Service has adopted the following guiding conservation principles for the Project to align it with our core values:

- conduct restoration, mining, milling, and reclamation activities in a manner consistent with environmental laws and regulations;
- locate Project infrastructure on previously disturbed areas where practicable;
- design and construct facilities to reduce impacts on aquatic and terrestrial wildlife, improve habitat quality across the Project site, and provide protections for anadromous and local aquatic populations;
- seek to protect and improve local surface water and groundwater quality; and
- repair, relocate, or construct new ecologically diverse stream channels and wetlands to mitigate those disturbed by legacy and new mine development.

Environmental Policy

Since the commencement of activities at the Project, and guided by our core values, Bedrock-Service has established environmental principles reflected in robust policies and standard operating procedures on and off site to protect the natural environment.

Bedrock-Service's commitment to the environment extends beyond protection alone. We seek opportunities to enhance the ecosystem in which we operate by improving habitat and restoring the site through the remediation of legacy impacts.

As noted above, these principles and the resulting policies and standard operating procedures will continue to be refined and developed as the Project advances, reflecting the Project's phases, including pre-construction, cleanup and construction, operations, closure and reclamation, and monitoring.

Bedrock-Service's environmental policy is a commitment to maintain sound environmental practices in its activities and to use continuous improvement processes to support efficient use of resources, processes, and materials.

To support implementation of this policy, all employees are responsible for incorporating into their work the actions necessary to take all reasonable care for the protection of the environment.

As such, Bedrock-Service commits to implementing programs to:

- assess the potential environmental impact of proposed activities and take steps to minimize, mitigate, or, where practicable, eliminate impacts;
- operate in accordance with recognized industry standards while complying with, and in some instances striving to exceed, applicable federal and state regulations and laws;
- regularly assess the Corporation's environmental impact and, through continuous improvement processes, strive to achieve higher levels of environmental performance;
- reduce the generation of hazardous and non-hazardous materials and properly dispose of waste that is generated;
- apply best management practices and technologies to reduce impacts and enhance environmental quality with respect to water, air, vegetation, and wildlife;
- maintain meaningful dialogue with communities and other stakeholders within the area of influence to understand concerns, reduce negative impacts, and improve environmental quality;
- progressively rehabilitate disturbed areas, where appropriate, and develop closure plans that can continually improve and incorporate new technologies where practical;

- train and educate employees and contractors to understand their environmental responsibilities regarding the Corporation's operations and activities;
- require contractors and suppliers to operate according to the Corporation's environmental standards and procedures; and
- consider environmental and social factors when purchasing equipment and materials.

Environmental Sustainability Goals

Recognizing the importance of the natural environment to the residents of the communities in which it operates, and as a central objective of Project development and operation, Bedrock-Service has focused from an early stage on the following restoration and mitigation principles in establishing a net-benefit goal for the Project:

- remove existing barriers to fish migration and re-establish salmon and steelhead passage to the headwaters of the East Fork of the South Fork of the Salmon River (EFSFSR) and Meadow Creek;
- re-establish fish habitat and spawning areas in the newly accessible EFSFSR and Meadow Creek;
- remove and re-process legacy tailings underlying the Spent Ore Disposal Area (SODA) to eliminate potential sources of metals leaching into groundwater as an advance compensatory restoration measure;
- remove, relocate, and potentially reuse legacy development rock from adjacent to the EFSFSR to eliminate erosion and sediment sources that may affect water quality;
- re-use legacy spent ore material for construction activities to reduce the amount of fresh material required for construction and thereby reduce the Project's environmental footprint;
- remove and reuse legacy development rock for construction activities to reduce the amount of fresh material required for construction and thereby reduce the Project's environmental footprint;
- remove unconstrained and potentially contaminated materials from the legacy ore processing facility, and any other contaminated areas identified during construction and operations, and place such materials in appropriately designed, engineered, and constructed permanent storage facilities;
- reforest the Project area to reduce sediment runoff that negatively affects water quality and fish habitat, and to enhance vegetation, riparian habitat, and tree canopy that support wildlife populations and help manage water temperature;
- provide solutions to address ongoing sedimentation in the area known as Blowout Creek to improve stream habitat within Meadow Creek and the EFSFSR;
- restore stream channels and riparian habitat altered or impacted by previous mining to improve fish habitat, fish spawning, and fish passage in support of a robust population of natural migratory fish, producing a net benefit from the Project;

- enhance fish habitat, spawning beds, and passage in drainages upstream of the current blockage to fish passage in support of a robust population of natural migratory fish; and
- implement sediment control actions, such as repairing East Fork Meadow Creek (EFMC), to reduce sediment input into Meadow Creek and the EFSFSR and thereby improve fish habitat and encourage additional spawning and natural fish population growth.

In addition to site rehabilitation from legacy disturbance, Bedrock-Service will minimize the Project's footprint and related impacts by using existing roads and by locating new facilities on previously impacted ground to the maximum reasonable extent and away from riparian areas to reduce potential impacts on water quality and fish populations.

Climate Change Policy and Mitigation Strategy

Bedrock-Service recognizes that it has a role to play in addressing climate change impacts associated with its operations and in reducing greenhouse gas emissions. To that end, Bedrock-Service will evaluate opportunities to reduce its greenhouse gas emissions, set carbon reduction goals, and report annually on fuel consumption, carbon offset measures, and mitigation efforts.

To reduce climate-related impacts, Bedrock-Service has committed to third-party verified carbon accounting and mitigation. Scope 1 and Scope 2 carbon emissions have been audited from 2017 to the present and will continue to be accounted for as efforts continue to improve performance over time. Scope 3 emissions will be included in future audits as mining operations begin.

Chemical of Concern – Cyanide Management

Cyanide is a carefully managed and regulated compound, and industry experience demonstrates that it can be used safely in the production of precious metals. Responsible management and compliance with state and federal law are essential to protecting waterways, soil, and wildlife in the surrounding ecosystem.

Bedrock-Service is committed to responsible cyanide use and management. This commitment includes selecting processing methods that reduce cyanide use where exposure to the environment may occur. Bedrock-Service has committed to neutralizing cyanide concentrations in the tailings to levels considered protective of wildlife and well below the 50 parts per million level advised by the Cyanide Management Institute.

Bedrock-Service is developing a cyanide management plan that will include training for employees and contractors and operating procedures regarding the transportation, use, and storage of cyanide. The cyanide management plan will comply with the State of Idaho's law governing cyanide use and all applicable state and federal regulations.

Bedrock-Service will also comply with the policies and requirements of the International Cyanide Management Institute, including third-party audits.

Emergency Preparedness and Catastrophic Hazard Management

Bedrock-Service is committed to protecting the safety and well-being of our people, as well as the communities and environment around us. By recognizing and mitigating catastrophic hazards, we can better protect people and the environment.

A catastrophic hazard is any event that, although unlikely, could cause widespread loss of life or significant environmental harm.

By taking a precautionary approach, we aim to establish effective emergency and crisis plans that allow for a rapid and effective response in the unlikely event of a catastrophic incident.

Health & Safety Policy

Since its formation, and in order to align with our core values, Bedrock-Service has established safety principles reflected in rigorous policies and standard operating procedures on site for the protection of the health and safety of people working at the Project and the public.

These principles, and the resulting policies and standard operating procedures, will continue to be refined and developed as the Project advances, reflecting the Project's phases, including pre-construction, cleanup and construction, operations, closure and reclamation, and monitoring.

Bedrock-Service's current Health and Safety Policy is set out below and will continue to be developed and refined as the Project advances.

Bedrock-Service believes that the health and safety of its employees is fundamental to the operation of its business. The goal is to have zero lost-time accidents. Bedrock-Service is committed to operational improvements that provide superior safety and occupational health management.

To fulfill this policy, all employees must perform their work in accordance with Bedrock-Service policies to the best of their ability and take all reasonable care for their own safety and health, as well as the health and safety of their coworkers.

To achieve these objectives, Bedrock-Service is committed to:

- providing the expertise and resources needed to maintain safe and healthy work environments;
- promoting occupational health and safety awareness so that it remains a priority in daily operations;
- promoting consultation and participation of workers, and where applicable their representatives, in the development of procedures and policies, and providing opportunities to contribute to the Bedrock-Service Integrated Environmental Occupational Health and Safety (EOH&S) Management System;
- establishing clearly defined safety and occupational health programs, including implementation of an integrated EOH&S Management System;
- implementing employee and contractor training and incident management systems;
- measuring safety and health performance and making improvements where warranted;
- operating in accordance with recognized industry standards while complying with applicable local and international laws and regulations;
- promoting the involvement of employees in the investigation of accidents and incidents and encouraging participation in developing effective and timely preventive and corrective action;
- training employees to carry out their jobs safely and productively, with no employee permitted to commence work without the requisite training, including hazard recognition;
- providing necessary personal protective equipment, such as hard hats and safety glasses, and instruction in its use;
- maintaining a high degree of emergency preparedness;
- requiring contractors and vendors to comply with all Corporation health and safety standards, with no contractor permitted to commence on-site work without the requisite training, including OSHA and MSHA training, hazard recognition, and safety training; and
- promoting the Health & Safety Policy as a way of life in all aspects of our work sites and in our family and local community.

Compliance

Currently, the Occupational Safety and Health Administration (OSHA) is the regulatory authority for the Project. Bedrock-Service has adopted OSHA training and safety standards and has voluntarily undergone Idaho-OSHCON safety audits on an alternating annual basis for the past seven years. Once the Project enters the construction and operations phases, the Mine Safety and Health Administration (MSHA) will become the regulatory authority.

The Board has formed a Technical Committee dedicated to oversight of the safety and environmental practices implemented by the Corporation. Senior management reports

quarterly to the Technical Committee and reports monthly to the Board of Directors on safety performance and training. Safety performance will be reported publicly on an annual basis.

Protected and World Heritage Site

Bedrock-Service values transparency and accountability in the protection of ecologically and culturally significant sites. This commitment includes not operating in areas of special importance for biodiversity, cultural value, or natural value, including UNESCO World Heritage Sites and UNESCO Natural World Heritage Sites.

SOCIAL RESPONSIBILITY

Transparency and Accountability

Social responsibility includes direct accountability and transparency with local communities affected by mining activities. Bedrock-Service is committed to working directly with local communities through formal and reliable channels of communication.

In 2018, Bedrock-Service signed a community agreement with eight communities. This agreement established the Stibnite Advisory Council, an independent organization made up of representatives from each community. The Council provides a forum for regular and ongoing direct communication and information sharing between senior Corporation leadership and community representatives for the life of the Project.

To support long-term and sustainable economic opportunity for the region, the agreement also established the Stibnite Foundation, a charitable organization governed by a board of community representatives and funded by Bedrock-Service through milestone payments. Once the Project is operating, Bedrock-Service will fund the foundation based on a profit-sharing formula over the life of the Project.

Compensation

Successful implementation of the Corporation's environmental, social, and governance goals requires the support and performance of senior management and staff. Accordingly, Bedrock-Service includes environmental, social responsibility, and governance objectives and goals in compensation plans and annual performance reviews.

Human Rights

Bedrock-Service is committed to ensuring that each person within the Corporation is treated fairly, equally, and respectfully, and to respecting human rights throughout the Corporation and in its dealings and relationships with stakeholders. This policy will continue to be refined and developed as the Project advances.

Bedrock-Service recognizes that human rights include the labor rights of all employees, including the right not to be discriminated against in employment and the prohibition of forced labor, compulsory labor, and child labor.

Bedrock-Service also recognizes that lands and resources in Idaho hold cultural and treaty-protected significance for tribes and tribal members across the state. We believe that by listening to tribal perspectives, incorporating their knowledge, providing an ongoing seat at the table, and implementing systems of accountability, we can create a healthier region for everyone, with improved water quality and restored salmon fisheries. This policy applies to all employees, representatives, Board members, and suppliers.

Sustainability Goals – Local Economic Impact

Bedrock-Service and its subsidiary businesses recognize that the goal of creating a financially sustainable business over the long term is consistent with the goals of the communities and countries in which it operates to create self-sustaining economies and societies.

Bedrock-Service recognizes that its goals, and those of the communities in which it operates, can be aligned to create mutual and lasting benefits. An important goal for the local communities surrounding the Project is the creation of sustainable, well-compensated employment. To support these aspirations, Bedrock-Service aims to continue encouraging local hiring, contracting, and the provision of supplies and services within the local communities and Valley County, and then expanding outward to adjacent counties, the State, and the broader United States.

In support of this goal, Bedrock-Service will:

- Maintain its Stibnite Gold Logistics Facilities (SGLF) near the community of Cascade for general administration, accounting, payroll, human resources, warehousing, transportation, and laboratory personnel. Employees assigned to this facility are expected to be, or become, residents of Valley County. Keeping as many support personnel as practical at the SGLF will reduce the number of employees transported to the Project site and housed at Stibnite Lodge, since SGLF workers will work more regular schedules and reside at home;
- Implement hiring practices that encourage the use of local contractors and local workers, and recruit outside the region only to the extent that qualified contractors and an adequate pool of candidates cannot reasonably be found locally, consistent with applicable legal requirements; and
- Implement a policy encouraging local purchasing and contracting, and work with local colleges and universities to identify training opportunities that support the hiring of qualified local workers.