

## **People and Human Rights Policy**

### **1 INTRODUCTION**

- 1.1 The Board of Directors of Largo Inc. (the Company or Largo) has determined that Largo should formalize its policy on matters relating to People and Human Rights.

### **2 OBJECTIVE OF THE POLICY**

- 2.1 This Policy affirms our commitment to operate in a way that respects human rights, as described in the UN Guiding Principles on Business and Human Rights (the UNGPs). This Policy is informed by:

- The International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and its two Optional Protocols;
- The United Nations Declaration on the Rights of Indigenous Peoples; The International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at Work; and
- The United Nations Global Compact.

Together, for the purposes of this Policy, the above documents are called the "International Human Rights Declarations."

This Policy is the overarching statement for other policies and procedures such as the Code of Business Conduct, Supplier Code of Conduct and the Safety, Environment and Social Responsibility Policy.

Where our Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with our standards.

### **3 APPLICATION OF THE POLICY**

- 3.1 The Policy applies to Largo's operations, its subsidiaries and, where deemed relevant, its suppliers and contractors. Compliance with this Policy constitutes a term of service for each director, condition of employment of each officer and employee and a contractual condition of applicable service and supply contracts as part of the Company's Code of Business Ethics and Conduct.
- 3.2 All persons covered by this Policy in discharging their duties on behalf of Largo will be required to comply with the laws, rules and regulations of the location in which Largo is performing business activities, and in particular with respect to anti-bribery and corruption laws, rules and regulations. Where uncertainty or ambiguity exists, please contact the Compliance Officer who may seek further legal advice.

### **4 SPECIFIC COMMITMENTS AND PROVISIONS**

#### **4.1 Commitments to Stakeholders**

We are committed to a due diligence process including conducting human rights risk assessments of our operations, to identify any actual or potential human rights impacts, and to implement programs and measures to prevent and mitigate any such impacts. We commit to adopting grievance mechanisms and provide remedies to correct any negative impacts. We commit to monitoring and reporting on actual and potential human rights impacts on a yearly basis.

**Employees:** We are committed to respect the human rights of our employees. We develop our human resources or personnel policies and practices at our operations to include the respect of fundamental rights of employees, as set out by the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, including, amongst other things: freedom of association and the effective recognition of the right to collective bargaining; the establishment of constructive mechanism where employees can seek redress for violations of these rights without recrimination; the effective abolition of child labour and the elimination of all forms of forced or compulsory labour, including servitude, human trafficking and exploitation.

**Business partners:** We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. Largo expects contractors, consultants and suppliers to share our commitment to human rights

**Local communities:** We seek to respect the human rights of local potentially affected peoples and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue and formal consultations where required, with the people affected by our operations.

## 4.2 Specific Provisions

### **Health and Safety: Promoting Health and Safety**

Largo is committed to work towards a goal of zero harm and general well-being in the workplace. This is endorsed by our Health and Safety Policies and Procedures.

### **Labour: Promoting Freedom of Association**

Largo upholds freedom of association and the effective recognition of the right to collective bargaining.

### **Labour: Eliminating Forced or Compulsory Labour, Human Trafficking and all Forms of Modern Slavery**

Largo opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery both within its own operations and through its supply chain. [

Largo will ensure that operational grievance mechanisms allow for cases of forced labour to be submitted and addressed.

### **Labour: Abolishing Child Labour**

Largo opposes the use of child labour. We will work in collaboration with subcontractors and suppliers to prevent and remove any instances of child labour in a manner that is consistent with the best interests of the child.

**Labour: Eliminating Discrimination in the Workplace**

Largo is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated. Largo seeks to provide each employee with equal opportunity for advancement without discrimination.

**Labour: Eliminating Harassment and Violence**

Largo is committed to promote a work environment free of any form of harassment, including sexual harassment, exploitation, abuse or violence as defined by the laws of each country in which we operate.

**Labour: Providing Competitive Compensation and Remuneration**

Largo aims to pay competitive wages based on local market assessments and at a minimum seeks to provide a commensurate compensation for each employee.

**Labour: Providing Training and Career Management**

Largo is committed to develop its workforce through mandatory and development training, performance reviews and career management.

**Labour: Upholding Conditions of Employment**

Largo complies with all laws regarding conditions of employment including basic and over-time working hours and will abide by agreements negotiated with our employee representatives.

**Local Communities: Avoiding Involuntary Resettlements**

Largo opposes involuntary resettlements.

**Local Communities: Respecting Indigenous Peoples' Rights**

Largo respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards such as Free, Prior and Informed Consent (FPIC).

#### **Local Communities: Adopting Proportionate Security Arrangements**

Largo aims to ensure that the provision of security to our operations and our engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines. We will adapt our security arrangements to balance the need for safety while respecting human rights.

#### **Local Communities: Developing Practices for Land and Water use**

Largo works towards understanding and applying sound practices for land and water use consistent with emerging international practices while respecting human rights, and in support of our Environment Policy.

## **5 VIOLATIONS OF THIS POLICY – GRIEVANCE AND ACCESS TO REMEDY MECHANISMS**

Largo is committed to take actions to ensure observance of this Policy. Rights holders becoming victim of or witness to non-compliance with the principles laid down in this Policy may raise their concerns in a confidential manner using the Whistleblower process. This process is available both internally and externally to local communities and other stakeholders and includes remedy to correct negative impacts.

Largo's Whistleblower Policy provides a Grievance mechanism following the principles of confidentiality and non-retaliation and provides a structure to remedy any negative impacts.

- 5.1 In addition, any director, officer, employee, or applicable consultant, supplier and contractor of Largo who becomes aware of any information suggesting that a violation of this Policy has occurred or is about to occur is required to report it through the *Ethics Hotline*.

- 5.2 Persons who refuse to engage in or permit an offence, or who raise legal or ethical concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Largo aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. No directors, officers, employees, consultants and contractors of Largo will suffer demotion, penalty, or other adverse consequences for refusing to engage in or permit a bribery offence or for raising concerns or for reporting possible wrongdoing, even if it may result in the Company losing business or otherwise suffering a disadvantage.
- 5.1 Largo's Whistleblower Policy provides procedures for reporting violations of laws, rules, regulations or Largo's corporate policies, including a procedure for anonymous reporting. For completeness, the contact information for the *Ethics Hotline*, which enables matters to be reported anonymously, is provided below.

[www.clearviewconnects.com](http://www.clearviewconnects.com) (search Largo Inc.)

**North America Toll-Free** (Dedicated line): 1 866 790 3021

**Brazil** (Identify Largo Inc. when calling): 0800 591 2083

**Ireland** (Identify Largo Inc. when calling): 1800 903 368

**Postal mail:** P.O. Box 11017, Toronto, Ontario, M1E 1N0

## **6 COMMUNICATION OF THE POLICY**

- 6.1 To ensure that all directors, officers, employees and applicable consultants and contractors of Largo are aware of the Policy, a copy of the Policy will be provided to them. Each Largo location will be responsible for determining the most appropriate method of communicating this Policy. All directors, officers, employees and applicable consultants and contractors of Largo will be informed whenever significant changes are made. New directors, officers, employees and applicable consultants and contractors of Largo will be provided with a copy of this Policy.
- 6.2 Training on this Policy will form part of the induction process for all new directors, officers, employees and applicable consultants of Largo. All existing directors, officers,

employees and consultants will receive relevant training on how to implement and adhere to this Policy.

- 6.3 Largo's zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors and business partners by way of our Anti-Bribery and Corruption Policy, compliance with which is a requirement of with them and as appropriate thereafter. For advice on these communications, please contact the Compliance Officer at [compliance@largoinc.com](mailto:compliance@largoinc.com).

## **7 RESPONSIBILITY FOR THE POLICY**

- 7.1 The Company's Board of Directors has overall responsibility for ensuring this Policy complies with Largo's legal and ethical obligations, and that all those under Largo's control comply with it.

The Compliance Officer has primary and day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness. Management at all levels is responsible for ensuring those reporting to them are made aware of and understand this Policy, and implementing the necessary programs and procedures to achieve the expected outcomes.

## **8 MONITORING AND REVIEW**

- 8.1 The Compliance Officer will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.
- 8.2 Internal control systems and procedures will be subject to audits to provide assurance that they are effective in countering bribery and corruption.
- 8.3 All directors, officers and employees and, where applicable, consultants and contractors of Largo are responsible for the success of this Policy and should ensure they use it to disclose any suspected wrongdoing.

- 8.4 All directors, officers, employees, consultants and contractors of Largo are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Officer.

## **9 CONSEQUENCES OF NON-COMPLIANCE WITH THE POLICY**

- 9.1 Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action or termination of employment or consulting arrangements without notice. Violation of this Policy may also violate or constitute a criminal offence under U.S., Brazilian or Canadian laws. If it appears that any director, officer, employee, consultant or contractor of Largo may have violated such laws, then Largo may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment for Largo and/or the responsible person.

Violation of this policy will lead to serious administrative and operational action, up to and including termination of contracts for breach and/or the elimination of Supplier from Largo's suppliers and bidders lists and the cancellation of any future business relationship.

## **10 QUERIES**

- 10.1 If you have any questions about how this Code should be followed in a particular case, please contact the Compliance Officer of Largo by email at [compliance@largoinc.com](mailto:compliance@largoinc.com).

Approved: November 2022