

HUMAN RIGHTS POLICY

| REVISION NUMBER | ORIGINAL ISSUE DATE | EFFECTIVE DATE |
|-----------------|---------------------|----------------|
| 1 | May 24, 2019 | May 19, 2021 |

SCOPE:

This Human Rights Policy (the "**Policy**") applies to Bluestone, its subsidiaries, and affiliates worldwide. All Bluestone board members, officers, employees, contractors, or any third-party service provider conducting work or acting on Bluestone's behalf ("**Subject Persons**") will behave in a manner that respects human rights and avoids infringing upon them. In addition, our subcontractors working at our sites are expected to comply with this Policy.

This Policy is intended to supplement all applicable laws, rules, and other corporate policies. It is not intended to supplant any local laws.

| APPROVED BY: | Board Chair | SIGNATURE: "William Lamb" | |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|--|
| ADMINISTERED BY: | Corporate Governance Committee | | |
| RELATED DOCUMENTS: | Code of Business Conduct and Ethics Anti-Corruption and Anti-Bribery Policy Conflict of Interest Policy Diversity and Inclusion Policy Sustainability Policy Elevar Resources Grievance Procedure Whistleblower Policy | | |

PURPOSE OF THE POLICY

The recognition and protection of human rights are fundamental values for Bluestone Resources Inc. ("Bluestone" or the "Company") and an inherent part of our commitment to ethical business conduct and corporate social responsibility. Our commitment to respect, promote, and support human rights and labour standards is based on the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We pursue opportunities to collaboratively support human rights where we can make a positive impact.

Our approach to Human Rights:

We recognize the important responsibility we have to respect human rights and we are guided by several principles that help define our approach:

- We are committed to meeting our responsibility to respect and promote human rights as defined by the UN Guiding Principles on Business and Human Rights.
- We do not tolerate violations of human rights committed by our employees, affiliates, or any third parties acting on our behalf or related to any aspect of our operations.
- We do not tolerate threats, intimidation, or attacks against human rights defenders.
- We condemn all forms of exploitation of children, forced labour, or any form of modern-day slavery.
- We value the occupational health and safety of our workforce and aim to cultivate a systematic culture of safe work at all times.

- We believe in a workplace culture free of all forms of discrimination and harassment where our employees are treated with dignity and respect. We do not tolerate discrimination against individuals based on gender, identity, age, nationality, ethnic origin, religion, education, sexual orientation, political belief, disability, appearance, family status, or union membership.
- We respect the right to freedom of association and collective bargaining and the right to equal remuneration for equal work.
- We are committed to understanding and respecting the cultural heritage, rights, and norms of our local communities; we work to obtain free, prior, and informed consent of Indigenous Peoples and we recognize their individual and collective rights and interests in line with ILO Convention 169 and UN Declaration on Rights of Indigenous Peoples.
- We consider the Voluntary Principles on Security and Human Rights (VPSHR) an essential component of our commitment to social responsibility and will ensure that the security of our employees, assets, and facilities is undertaken in compliance with the law and meets the requirements of the VPSHR.
- We seek to contribute to public discussion about human rights issues and identify opportunities to
 engage government constructively on human rights issues relevant to our business in the host
 country.

To meet our responsibilities to respect human rights, we take the following actions:

- We have embedded human rights principles in a number of our internal policy documents and standards, including those related to employment practices, supply chain, environmental practices, social performance, and security.
- We assess potential human rights issues related to our business and projects. We conduct human rights due diligence for our project, including design modifications, and develop action plans to mitigate those impacts.
- We perform reasonable due diligence for consultants, contractors, and other third-party service
 providers, require that human rights terms and conditions be included in contracts, and require
 periodic human rights reporting and certifications.
- We communicate this Policy to our employees, partners, contractors, and any third party acting on our behalf. We provide training on human rights and codes of conduct annually for our employees and contractors.
- We provide a safe and healthy workplace for our employees, contractors, and subcontractors.
- We have integrated the VPSHR into our security-related policies and procedures.
- We establish ongoing engagement with our communities and other stakeholders affected by our operations and develop and maintain meaningful relationships based on transparency, trust, and mutual respect.
- We have established a grievance mechanism where human rights complaints can be reported and addressed without any prejudice to the grievant.
- We monitor and try to continuously improve our human rights performance and we report on human rights in various instruments, including through our annual Sustainability Report and our corporate website.

 In instances in which we determine that our employees, affiliates, or third parties acting on our behalf have caused adverse human rights impacts, we will consider appropriate mechanisms to mitigate such impacts and remediation, and where violations by employees are proven, Bluestone will consider appropriate sanctions and remedies to victims.

RESPONSIBILITIES

The Executive Committee of Bluestone is responsible for ensuring adherence to the commitments presented in this Policy and is responsible for conducting an annual review through the Board of Director's Health, Safety, Environment, and Sustainability Committee to ensure that it is achieving its purpose.

The Health, Safety, Environment, and Sustainability Committee also has oversight of the implementation of this Human Rights Policy and addressing human rights issues raised through the Whistleblower Policy. Senior management has responsibility for overseeing its implementation and ensuring that any allegations of violations of human rights and non-compliance with this Policy are investigated.

POLICY REVIEW

The Company will review this Policy annually to ensure that it is achieving its purpose. Based on the results of the review, the Policy may be revised accordingly.