

## Indigenous Relations Policy

### Purpose

The purpose of this Policy is to ensure that Personnel pursue and develop long-term mutually beneficial relationship with Indigenous Groups in support of the Company's business and corporate social responsibility objectives across Canada. This Policy sets expectations for and guides Sublatus Incorporated and its subsidiaries and affiliates ("Sublatus Inc.", "Sublatus Environmental", or the "Company") to meaningful consultation, building respectful relationships, and obtaining the free, prior and informed consent of Indigenous Peoples/Groups aimed at achieving regulatory certainty and maintaining access to land, while supporting such Indigenous Group's capacity-building initiatives and participation in economic opportunities.

### Scope

The commitments outlined in this Policy are shared by all Sublatus officers, employees, consultants, contractors and directors. Personnel will ensure that implementation of this Policy is consistent with Sublatus' Indigenous Engagement and Inclusion Commitment Statement

### Policy

- When engaging and collaborating with Indigenous Groups, all Personnel will respect the spirit and intent of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and its guiding principles within the context of existing Canadian law and the associated commitments and roles that government have, relative to Indigenous Groups.
- All Personnel conducting business activities on behalf of Sublatus will recognize and respect that Indigenous Peoples may have a collective attachment to the land and resources associated with Sublatus business activities, and that there are often separate organizational and governance structures and political institutions from those of the jurisdictions they fall under. Personnel will ensure that they are conducting any such business activities with integrity, mutual responsibility and collaboration.
- When engaging in consultations related activities with Indigenous Groups, Personnel will engage with Indigenous Groups in a timely manner, to allow them to identify interests, understand the potential impacts of our business activities and make decisions freely and openly. Personnel must ensure meaningful and respectful Engagement and dialogue through the use of principled, transparent and adequate approach.
- Personnel who are working with Indigenous Groups are expected to take the Company's Indigenous cultural awareness training to help them work more effectively and collaboratively with indigenous groups.

### Compliance

Personnel must comply with all aspects of this Policy and support others in doing so. Personnel are responsible for promptly reporting suspected or actual violation of this Policy, applicable law, or any other concern, through available channels so that it can be appropriately investigated, addressed and handled. Personnel who fail to comply, or knowingly permit Personnel under their supervision to not comply, may be subject to appropriate corrective disciplinary action in accordance with the Company's Policies and processes.

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### Non-Retaliation

We support and encourage Personnel to report suspected incidents of non-compliance with applicable laws, regulations, and authorizations, as well as hazards, potential hazards, incidents involving health and safety or the environment and near hits. We take every report seriously, investigate each report to identify facts, and effect improvements to our practices and procedures when warranted. All Personnel making reports in good faith will be protected. Good Faith Reporting is intended to remove protection for Personnel making intentionally false or malicious reports, or who seek to exempt their own negligence or willful misconduct by the act of making a report. We ensure immunity from disciplinary action or retaliation for Personnel for the Good Faith Reporting of such concerns. Reports can be made to management.

### Definitions

*Aboriginal Peoples* means the First Nations, Metis, and Inuit peoples whose rights are recognized and affirmed in the Canada Constitution Act, 1982.

*Engagement* means the activities conducted by Sublatus to identify, understand and consider potential effects of Sublatus Business activities on Indigenous groups with the intention to substantively address them.

*Indigenous Groups* means any combination of Aboriginal, Indigenous Peoples, communities or organizations.

*Indigenous Peoples* means Aboriginal peoples of Canada.

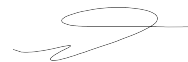
Good Faith Reporting means an open, honest, fair and reasonable report without malice or ulterior motive.

*Personnel* means full-time, temporary and part-time employees and contractors.

*Sublatus or the Company* means Sublatus Incorporated and its subsidiaries and affiliates (“Sublatus Inc.”, “Sublatus Environmental”).



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