

MINA DO BARROSO - “THE SAV WAY”

PURPOSE

The Company, Savannah Resources Plc (SAV) has a Code of Conduct and this document, “the SAV Way”, highlights the matters covered by that and other Company guidelines, on matters of particular relevance to employees and contractors working at the Mina do Barroso Project, and the behaviours expected of them.

GUIDING PRINCIPLES

1. Safety

The safety and wellbeing of our employees, contractors and communities is our prime concern. Guarding the environment is an essential part of our care for future generations.

We endeavour to make safety the first part of every interaction and we will always stop work whenever health, safety or wellbeing is potentially at risk.

2. Respect for Culture

We respect diverse cultures and points of view other than our own. We treat each other and those we interact with or affect with respect, dignity and fairness. We listen to different points of view and value the contributions of others. We try to become aware of our own strengths and weaknesses and are always willing to be challenged in a respectful manner.

3. Accountability

We always try to do what is right, not what is easiest or cheapest. We focus on building trust over a long period while maintaining our ethical position and promoting transparency. We will act honestly and always accept accountability for our decisions and actions.

4. Be the Best

We aim to achieve high performance and be as close to perfection as possible. We will respond to what customers and partners expect and need from us, without compromising. We have high expectations and are always looking to improve.

EMPLOYEE AND CONTRACTOR GUIDELINES

Safety, Health, Environment, & Community

- 1) **Safety and Health:** We are all personally responsible for working safely, maintaining standards and always being aware of the health and safety of those around us.
- 2) **Environment:** We are keenly aware of environmental matters from design right through to rehabilitation and mine closure. We will collaborate with Government authorities,

international institutions, local communities and other stakeholders to mitigate the environmental impacts of our operations. This will include such simple steps such as banning the use of single use bottled water to the implementation of all aspects of Environmental Impact Assessments.

- 3) **Community Interaction:** We realise that our relationships with local and regional communities are our key to success. We recognise and respect the lifestyles of those with whom we work. We seek to work in a manner that will provide benefits for all involved. We work with communities to understand the impacts from our activities and we aim to maximize positive outcomes. We do not show favour to any political party and respect the internal elections of all countries in which we work.

Respect, Integrity, and Avoidance of Bribery & Corrupt Practices

- 1) **Local, empowerment, laws and agreements:** We adhere to labour laws and international agreements. We work within the law with regard to payment of taxes, royalties, and duties, and, where possible, we prioritise local employment and local service provision.
- 2) **Discrimination, and Intimidation:** Everyone should be treated with dignity and respect. Discrimination, intimidation, bullying, or harassment of any kind is not acceptable.
- 3) **Bribery, Corruption and Conflicts of Interest:** Under no circumstances do we ever offer, pay or accept bribes. We do not allow any third parties associated with us to offer, pay or accept bribes. All staff and service suppliers are required to sign our Anti-Corruption, Anti-Bribery agreement. We go out of our way to avoid situations where there may be, or even appear to be, a conflict of interest.
- 4) **Record keeping:** We must keep accurate and timely financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties (including, but not limited to, suppliers, customers, charities, municipalities, government departments, or other bodies).
- 5) **Purchasing of Goods and Services:** We must ensure that the procurement of goods and services must be conducted in a fair and transparent manner.
- 6) **Company Information and Intellectual Property:** We respect the intellectual property of third parties and will not use intellectual property without prior authorization. Company property will not be used for personal benefit or for any activity that causes a conflict of interest, or is inappropriate or illegal. We maintain accurate records of all financial and non-financial company assets.
- 7) **Data Protection:** We only collect personal information when needed for legitimate business purposes. We respect the rights of each employee to review and correct any incorrect data. We only share personal data with third parties when there is a legitimate business or legal need. We do our utmost to protect any data retained by the company from theft by third parties.
- 8) **Whistleblowing:** We have a whistleblowing policy exists so that suspected violations of the Code of Conduct can be anonymously reported to an external firm of lawyers.