

JULY 2017

ENVIRONMENTAL POLICY

1. Purpose of this Policy

At SMHL, environmental protection is a fundamental principle in conducting our business. We are therefore committed to a policy of sustainable resource development, which embodies the protection of human health and the natural environment, over the full life cycle of mining.

We have established this Environmental Policy (this “Policy”) to outline the values and standards for our environmental programs and management systems, and to comply with all applicable environmental laws, rules and regulations.

2. Application of this Policy

This Policy applies to all of our directors, officers and employees. In this Policy, these individuals are referred to as “you” or “your,” and Vimetco and our affiliates, wherever located, are referred to as “SMHL or “us.”

You are responsible for ensuring that you comply with this Policy at all times. If you fail to comply with this Policy, SMHL will treat that failure very seriously and may take disciplinary measures against you, up to and including dismissal.

Training

SMHL will educate all new directors, officers and employees about the matters contemplated by this Policy and, on an on-going basis, will ensure that all directors, officers and employees are aware of their obligations to comply with it.

Periodic Review of this Policy

When your employment or association with SMHL begins, you must sign an acknowledgement form confirming that you have read and understand this Policy and agree to abide by its provisions. You will be asked to make similar acknowledgements and participate in training on a periodic basis.

Failure to read or understand this Policy or sign any acknowledgement form or participate in training does not excuse you from compliance with this Policy.

3. Administration of this Policy

Our General Manager, Environment Health & Safety Manager has general responsibility for the administration and interpretation of this Policy and to ensure compliance with it. The General Manger, Environment Health & Safety Manager may adopt environmental controls and procedures in addition to those set out in this Policy.

Dissemination

A copy of this Policy will be provided to all SMHL personnel. This Policy will also be maintained online on our shared network and website.

Questions and Guidance

If you have any questions about this Policy, please first raise the matter with your immediate supervisor or EHS Manager. Additional guidance may also be requested from and provided by our Community Affairs Manager.

4. General Principles

At SMHL, we all are accountable for providing environmental leadership by communicating our environmental requirements and commitments to employees, contractors, local communities, regulators, the general public and other stakeholders. We will strive to create an environment where every one of our employees commits to a culture of environmental protection. In Sierra Leone and internationally, we will comply with regulatory requirements and diligently apply appropriate methodologies to protect the environment over the full life cycle of mining, including throughout our exploration, development, mining, processing and closure activities.

Our environmental obligations include, but are not limited to, obtaining and maintaining all environmental permits and approvals required for the conduct of our operations, the proper handling, storage and disposal of regulated materials and the timely and accurate submission of required reports to the appropriate government agencies. We are committed to fulfilling each of these obligations in an effective and responsible manner. In advancing each of our environmental values, standards and commitments, we will:

- comply with all applicable environmental laws, rules and regulations, and all applicable regional and site rules and regulations;
- develop, implement and evaluate our environmental programs and management systems with a view to continually improving our environmental performance;
- develop, design and operate our facilities based upon the efficient use of energy, resources and materials;
- identify, assess and manage environmental risks;
- develop and use environmental management tools and practices to prevent and eliminate or minimize environmental impacts; and
- encourage dialogue on environmental issues, and respond to public and other stakeholders' inquiries regarding environmental matters in an open, forthright and sincere manner.

5. Reporting Policy Violations

You should be alert and sensitive to situations that could result in actions that might violate any laws, rules or regulations or the standards of conduct set out in this Policy. If you believe your own conduct or that of a fellow employee may have violated any such laws, rules or regulations or this Policy, or that such a violation will occur, you should report the matter, in as much detail as possible, to facilitate an appropriate investigation.

If you are an employee, you should raise the matter with your immediate supervisor. However, if you are genuinely not comfortable raising the matter with your immediate supervisor, or you do not believe he or she will deal with, or has dealt with, the matter properly, you should raise the matter with the Environment Health & Safety Manager.