

HEALTH AND SAFETY POLICY

Effective date: January 01, 2022

1. Overview

- Penfold World Trade AG (“Penfold”) aims to conduct all business activities in a manner that protects the environment and the health and safety of our employees, contractors, customers, and communities.
- Health and Safety is a core value of our company and we believe all workplace incidents that could cause serious harm to our employees, contractors, and other persons in our workplaces are preventable. Everyone has the right to healthy and safe workplace.
- Penfold will comply with all applicable environmental requirements, prevent pollution, and continually improve performance on criteria relevant to its businesses and operations.
- Penfold will comply with all applicable occupational health and safety, process safety, and product safety requirements, continually improve performance on criteria relevant to its businesses and operations, and insist that all work, however urgent, be done safely.
- We will identify hazards, risks and unsafe conditions and behaviours. Where these cannot be eliminated, they will be appropriately mitigated.

2. Specific Precautions Regarding Mined Materials

Penfold engages in the physical trade of mineral bearing ores and concentrates and related upstream and downstream activities. As such our employees, consultants and third-party visitors may in the course of your work come into contact with dust and with materials containing elements such as lead, arsenic, mercury, and cadmium that may be dangerous to your health. We shall provide all such employees, consultants and third-party visitors with appropriate personal protective equipment (PPE) at no cost to the individuals and ensure individuals are trained in their use. Penfold requires that facial respirators or masks are used throughout visits to mines, mills, warehouses, storage sheds/areas and ports.

Penfold will require that all employees, consultants and third-party visitors (those who will visit mines, mills, warehouses, storage sheds/areas and ports) read and adhere to the principles in the “*Working Safely with Lead*” [Appendix 1] brochure attached herein and adhere to its principles. Further, employees, consultants and third-party visitors will be instructed in taking basic precautions such as washing hands prior to and after being in the vicinity of such materials. At risk individuals, such as those pregnant or expecting to become pregnant, shall take extra precautions. Individuals may not bring any minerals, ores, concentrates, or other products into the office without first understanding the content of any such dangerous materials and advising the local manager of that office.

3. Personal Safety

Penfold’s primary concern at all times is for the personal safety of all persons we interact with. Penfold will never ask any employee, consultant or third-party to undertake any travel, meetings, or activities that may endanger personal safety beyond normal life risks.

If any person feels their safety is in threat or feels that proposed travel will be unsafe, such persons are encouraged to raise your concerns prior to travel even if the change in plans would be disruptive, incur

additional cost, or result in lost business. At a minimum the following principles must be adhered to in planning and carrying out work travel:

- Do not schedule any road travel greater than 30 minutes after dark or before sunrise.
- Do not undertake any road or air travel in foggy, heavy rain or winter weather conditions.
- Do not meet any travel to a location or meet a customer or work contact if you feel such travel or meeting would be dangerous.
- Travel in only licensed taxis or known private cars and wear seatbelts at all times.
- Require drivers who are driving over the speed limit to slow down or stop.
- Switch drivers or terminate travel immediately if a driver is found to be over tired or intoxicated.
- Travel with at least one other trusted person when travelling to remote locations and undertake thorough risk assessment prior to travelling to remote, unfamiliar, or wild areas.
- Do not drink alcohol to excessive no matter customer or peer pressure to do so, and take care to limit or abstain from drinking alcohol completely when travelling at elevations above 1500m.
- Never consume alcohol within 3 hours prior to driving, operating machinery, or visiting mine/factory facilities.
- Do not undertake travel by foot outside of cities unaccompanied and without specific directions, appropriate footwear and inclement weather survival gear including compass, current map, flashlight, extra phone and other batteries, and rain/cold-weather clothing. Plan to complete any such foot travel well in advance of sundown.
- Do not visit any mines or processing facilities without adequate safety gear including hard hats and high-visibility clothing. Exercise extreme caution in entering any underground mining operations. Refuse to enter any underground mining operation if you feel safety conditions are inadequate.
- Alert someone immediately if you are feeling unwell at high altitude locations and arrange to immediately descend to lower altitudes.

4. “See Something, Say Something”

An informed and alert team plays a critical role in keeping the workplace safe. All Penfold employees and visitors shall be encouraged to “if you see something, say something” and should be made to feel comfortable enough to speak up to Penfold management about safety violations they think may be occurring.

This requirement to be aware of health and safety issues extends to interactions with and visits to suppliers, potential suppliers, and third-parties such as logistics providers and warehouse operators. Activities witnessed that potentially endanger health and safety or otherwise not in line with Penfold’s Code of Conduct and Ethics shall be reported in follow-up written reports to Penfold management, and in cases of possible imminent harm Penfold employees are empowered to attempt to redress the situation immediately upon recognition of the potential unsafe behaviour.

5. Commitments to Educate, Prevent, and Improve

Penfold strives for continuous improvement in all aspects of health and safety and shall at all times promote employee participation in the refinement of health and safety standards such that our employees take ownership of their health and safety responsibilities.

Penfold shall implement accident prevention programs and require that employees perform their duties in the safest manner possible. We will ensure accident reporting is completed in a diligent manner and where necessary take immediate steps to mitigate the potential for a reoccurrence.

We will ensure that first aid and emergency response plans are in place at each operation.

Finally we shall provide for annual audits of all health and safety programs and with our capabilities remediate all identified health and safety findings promptly.

Appendix 1: “Working Safely with Lead” Brochure follows below.

**Working Safely With LEAD
DANGERS TO LEAD
WORKERS**

If lead enters our bodies it may cause many health problems, some serious – over long periods of exposure. So, it is important that workers protect themselves.

Health Effects of Lead

- It can affect almost every part of the body.
- Low Levels of exposure can cause joint & muscle pain, High blood pressure & memory loss.
- High lead levels can damage major organs (kidneys & liver) & cause Nerve & blood problems.
- Very High Levels can cause fits, coma, extreme cases death

BRAIN-Reduced IQ and memory loss

ORGAN DAMAGE-eg.: Kidneys, lungs

TESTES AND OVARIES-Infertility and no sex drive

BONES AND BLOOD DAMAGE

Blood Lead Results

- Action Level: > 30ug /dL
- -(>10ug/dL – females)
- Transfer level: > 35ug/dL
- -(>14ug/dL – females of reproductive capacity)
- -(>30ug/dL – females of non-reproductive capacity)

If your blood lead reaches > 30ug/dL you need to complete the following.

- Review recent exposure to lead
- Review work history & exposure history
- Review current work practices & hygiene controls
- Investigate reasons for an increase
- Measures **MUST** be taken to reduce exposure

“REMEMBER”

- Let your employer know if you pregnant
- Eat a healthy diet and eat breakfast before work
- Eat in clean areas
- Wash your hands and face before eating
- Wear protective clothing
- Wear a respirator when required
- Keep your work area clean as possible
- Don't bite your fingernails
- Shower and change into clean clothes when leaving site

What You Can Do

Maintain a healthy lifestyle

Lead is absorbed more readily on an empty stomach

- * Eat less fatty foods (they increase the amount of lead held in our bodies)
- * Eat fruit & vegetables (they help to remove lead from our bodies)
- * Drink plenty of water as this helps to cleanse our system.



How Lead Gets Into Your Body

Breathing in dust and fumes

Is the main way lead enters a workers body. Fine particles of lead can penetrate deep into the lungs and pass into the blood.

Eating Contaminated Food & Drink

Can occur if workers don't wash their hands before meals and eat in workplaces where lead dust is present. Smokers can accidentally take in lead dust if it's on their hands or cigarettes.

Absorption Through The Skin

Can happen where leaded petrol or lubricates are handled without the correct PPE. Research suggests that fine particles of lead may be able to enter the body through sweat pores in the skin.

Create a Safe Workplace

Many simple changes to plant, machinery, production processes, equipment and work practices can reduce the danger of lead. By conducting risk assessments, ISA's, contacting your supervisor or safety coordinator the dangers of lead may be engineered out of the process.

Example: Bolting and clamping walkway mesh in place rather than welding it in place.

What You Can Do

Wash Your Hands and Face before Meals and Smoking

This will help ensure you do not accidentally eat lead dust. Don't smoke or carry cigarettes where lead dust is present. Eat in clean areas.

Maintain Good Personal Hygiene

- * Keep your fingernails clean & don't bite them.
- * Shower & wash your hair at the end of each shift.
- * Be clean shaven
- * Change into clean clothes before leaving site & wear clean clothes every day.

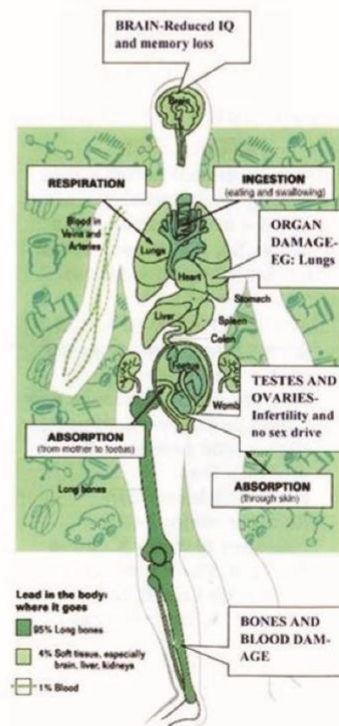
This stops taking lead dust home and will protect your family.

Wash Vehicles Before Leaving Site

Vehicles leaving site are to washed before they are permitted to leave. This stops lead being transported to town and affecting your families.

Use The Proper PPE

Using respirators and face masks, overalls, gloves and other PPE will help protect you from lead and other dangerous materials. It's your employer's responsibility to provide the correct equipment and the employee's responsibility to look after it.



Health Effects of Lead