

# Sherritt International Corporation

2021 Annual Report

to

The Voluntary Principles on Security and Human Rights

**sherritt**

Submitted May 2022

## Executive Summary

Sherritt International Corporation (Sherritt or the Company) is committed upholding and implementing the Voluntary Principles on Security and Human Rights (the Voluntary Principles or the VPSHR). This commitment is widely reflected across the company's policies, management systems, and improvement plans.

Since 2014, Sherritt has been developing a management system to assist its operations in the identification and mitigation of potential security and human rights related risks, in alignment with the expectations of the Voluntary Principles.

Sherritt endeavors to apply the Voluntary Principles at all of its sites; however, the pace and breadth of implementation is based on the individual site's risk profile and operating context. Specifically, application of the Voluntary Principles at the Company's operations in Cuba requires a longer-term approach to familiarize Sherritt's joint-venture partners – which are state-owned enterprises – and other government stakeholders with the VPSHR. In Canada, Sherritt recognizes that security and human rights-related risks are relatively low and good governance practices are relatively mature; therefore, few additional measures need to be put in place to ensure compliance with the Voluntary Principles.

This report is the Company's sixth to the VPSHR Plenary and focuses primarily on initiatives carried out over the past year at Sherritt's sites in Canada and Cuba. Sherritt no longer operates nor does it have any ownership or other interests in any operation in Madagascar.

*Highlights from 2021 include:*

- Continued use of UNICEF's Canada's Child Rights and Security Checklist as a guide in the development of new programs;
- Third-party verification audit of the Mining Association of Canada (MAC), Towards Sustainable Mining protocols, which align with the Voluntary Principles at the COREFCO Site;
- Engagement with officials in Cuba on the VPs and potential implementation at Sherritt's sites in the country was delayed due to COVID-19 restrictions;
- No human rights incidents or allegations of a human rights incident were recorded; and
- Continued to embed VPs requirements at the company's COREFCO refinery in Canada.

## Reporting Content

### A. Commitment to the Voluntary Principles

#### 1. *Public Statement of Commitment or Endorsement of the Voluntary Principles*

Sherritt's public commitments to the VPSHR are reflected in its [Human Rights Policy](#). Sherritt also has a Security and Human Rights Standard and additional procedures and guidance developed to operationalize specific elements of the Voluntary Principles into Sherritt's internal security practices.

This public commitment was updated in 2020. It aligns with declarations and guiding principles from the United Nations and includes clear commitments to Rights of the Child. The Human Rights Policy applies to all Sherritt operations in Canada and Cuba and is frequently communicated to all employees, contractors, consultants, suppliers, and joint venture partners. It is also included in applicable contractor and supplier contracts and agreements. Senior management and the Board of Directors understand and endorse these commitments. VPSHR performance updates are provided to senior management and Board of Directors on a quarterly basis.

Additional public information on Sherritt's approach to security and human rights, performance highlights, and a case study from the COREFCO refinery are available [here](#).

#### 2. *Engagement in the Voluntary Principles Initiative (VPI)*

Sherritt has been unable to meaningfully engage in VPI initiatives due to staffing constraints caused by resignations during 2020 – 2021.

Nonetheless the company strives to abide by the governance rules and engage in Corporate pillar meetings, Canada working group meetings, verification presentations, and other special reviews.

At Sherritt's COREFCO refinery, additions to the security guard training curriculum include: respectful work place, verbal judo de-escalation, and requirements of the Voluntary Principles on Security and Human Rights (introduction and intermediate levels).

Sherritt's COREFCO refinery informs all relevant stakeholders, including contractors and suppliers of the Human Rights Policy, expectations and requirements, and undertakes due diligence of their practices, policies, and reputation, as appropriate.

In 2021 as part of its responsible sourcing efforts Sherritt developed a mineral feed policy and mineral supplier code of conduct that requires mineral feed suppliers 'to align security management practices with the Voluntary Principles on Security and Human Rights'. These were communicated to mineral feed suppliers in 2021 and supplier due diligence was conducted to ensure endorsement of the commitments.

Sherritt's collaboration with its Cuban joint venture (JV) partners involved partnering with the Canadian, Cuban, and Bahamian marketing and sales team outside Canada to develop mineral feed supplier policies and due diligence practices.

Sherritt's direct engagement with the Cuban state enterprise responsible for the provision of security at Sherritt's JV Cuban operations was impacted by COVID-19 travel restrictions.

Sherritt is committed to provide timely responses to reasonable requests for information from other participants. In 2021 no such requests were manifested. Sherritt remains committed to facilitating greater shared understanding of issues related to the implementation of the Voluntary Principles.

### *3. Transparency*

All MAC members that rely on private and public security forces are expected to implement a human rights and security approach aligned with the Voluntary Principles and report on their implementation annually in MAC's Towards Sustainable Mining Progress Reports. While MAC is not requiring members with Canadian operations to implement the VPs due to Canada being a low-risk jurisdiction, Sherritt continues to implement the principles at our COREFCO refinery. Sherritt's first TSM report for the COREFCO refinery will be available in 2022 on MAC's company performance [website](#).

As noted, Sherritt's public Sustainability Report includes a section on site security and human rights. Sherritt elects to report Core Option against the Global Reporting Initiative (GRI), which includes indicators on grievances and human rights. This information is available at [sustainability.sherritt.com](https://sustainability.sherritt.com).

### *4. Examples of promoting awareness of the Voluntary Principles throughout the organization or government, including within the value chain.*

Sherritt's COREFCO refinery requires contractor, sub-contractor, and suppliers to review Sherritt's Environment, Health, Safety & Sustainability, and Human Rights Policies, including its commitments to Voluntary Principles. To qualify as an approved contractor or subcontractor, organizations must acknowledge and endorse these commitments. Sherritt undertakes due diligence of their practices, policies, and reputation on a risk basis.

In 2021, the COREFCO refinery updated its mandatory site safety orientation for all new employees and visitors, including the elements specifying commitments to the VPs and applicable site security and human rights practices.

In 2021 as part of its responsible sourcing efforts Sherritt developed a mineral feed policy and mineral supplier code of conduct that require mineral feed suppliers 'to align security management practices with the Voluntary Principles on Security and Human Rights'. These were communicated to mineral feed suppliers in 2021 and supplier due diligence was conducted to ensure endorsement of the commitments.

Sherritt's collaboration with its Cuban joint venture (JV) partners involved partnering with the Canadian, Cuban, and Bahamian mineral procurement and marketing team outside Canada to develop mineral feed supplier policies and due diligence practices.

Sherritt's direct engagement on the principles with the Cuban state enterprise responsible for the provision of security at Sherritt's JV operations in Cuba was impacted by COVID-19 restrictions in 2021, but it is our intention to resume this engagement in 2022.

*5. Examples of promoting and advancing implementation of the Voluntary Principles internationally.*

Efforts to work with directly with civil society organizations, local NGOs and partners to promote and understand the Voluntary Principles and to engage with local communities to promote and understand the Voluntary Principles were impacted by COVID-19 restrictions in 2021. However, as noted above, Sherritt does report on its commitments to the principles and its site security and human rights risks in its Annual Sustainability Report, which is made available to the public and publicized through Sherritt's communication platforms (i.e. Sherritt website, twitter, LinkedIn, investor presentations, etc). This report is also shared with organizations or other stakeholders (i.e. NGOs, academia) at their request.

Sherritt's COREFCO refinery is a member of the Alberta Northeast Region Community Awareness Emergency Response Organization (NRCAER). This is a non-profit mutual aid organization composed of industry and municipal government entities who provide and promote safety and emergency response support initiatives. Through regular interactions and special presentations Sherritt management promotes the adoption of the Voluntary Principles and shares best practices with other members of NRCAER.

Sherritt is a participant in the Canada Working Group (CWG) on the VPs, which includes members from industry, NGOs, and government (GAC), MAC and a representative from the Mining Security Working Group. This collective met once in

2021. Most or all of the industry participants have international operations that are promoting and / or implementing the VPs.

As mentioned above, in 2021 as part of its responsible sourcing efforts Sherritt developed a mineral feed policy and mineral supplier code of conduct that require mineral feed suppliers ‘to align security management practices with the Voluntary Principles on Security and Human Rights’. These were communicated to mineral feed suppliers in 2021, including those that provided mineral feed from outside of Canada in places such as Cuba and Australia.

In 2021 Sherritt referenced its commitment to the VPs and experience implementing them when responding to customer and industry association responsible sourcing surveys and questionnaires.

As mentioned above, Sherritt’s collaboration with its Cuban joint venture (JV) partners involved partnering with the Canadian, Cuban, and Bahamian mineral procurement and marketing team outside Canada to develop mineral feed supplier policies and due diligence practices.

## **B. Policies, Procedures, and Related Activities**

### *6. Relevant policies, procedures, and/or guidelines (or any changes thereto from the previous reporting year) to implement the Voluntary Principles.*

Sherritt’s public commitments to the VPs are reflected in its [Human Rights Policy](#). The policy states that “Sherritt will ensure that the security arrangements for the company’s operations respect human rights and are consistent with the Voluntary Principles on Security and Human Rights” and “Sherritt expects contractors, consultants, suppliers, and joint venture partners to share the company’s human rights commitments”.

This public commitment was updated in 2020. It aligns with declarations and guiding principles from the United Nations and includes clear commitments to children’s rights. The Human Rights Policy applies to all Sherritt operations in Canada and Cuba and it was communicated to all employees, contractors, consultants, suppliers, and joint venture partners. It is also included in applicable contractor and supplier contracts and agreements.

Sherritt also has a Security and Human Rights Standard and additional procedures and guidance developed to operationalize specific elements of the Voluntary Principles into Sherritt’s internal security practices.

Sherritt’s operations strive to comply with the corporate policy and standard requirements. The standard is supported at the COREFCO refinery by a series of

Security and Human Rights procedures and work instructions, including:

- Entering Agreements with Private Security Service Providers
- Entering Agreements with Public Security
- Reporting and Investigation of Security Related Incidents
- Use of Force
- Protection of Providers of Confidential Information
- Apprehension and Transfer of Suspects to Public Custody
- Security Post Order documents
- Security Guard training and on-going review.

In 2021, the COREFCO refinery updated its mandatory site safety orientation for all new employees and visitors, including the elements specifying commitments to the VPs and applicable site security and human rights practices. This training is further supplemented by training-training modules and the provision of resources on internal information platforms such as Share Point.

Sherritt's Senior Vice-President of the Metals Enterprise JV is accountable for providing the necessary management systems and resources to ensure full compliance with these requirements. Sherritt's Vice-President, Sustainability, is responsible for the maintenance and regular review of the policy and procedures. Human rights and security specific key performance indicators include implementation and promotion of the VPs, which are tracked and reported quarterly to Sherritt's senior management and Board of Directors.

#### *7. Company procedure to conduct security and human rights risk assessments.*

Security and human rights risk assessments are conducted according to the risk profile of all sites. The risk profile of a site is determined using a set of criteria including, but not limited to: the host country's control of corruption, rule of law, political stability, and conflict situation. Cuba-based operations fall into the moderate-risk category and Sherritt's refinery in Alberta, Canada, is in the low-risk category. Sherritt's Security and Human Rights Standard stipulates that all high-risk sites must complete a risk assessment on an annual basis and all low- to moderate-risk sites must complete a risk assessment on a triennial basis. As part of the security and human rights risk assessment, the sites must analyze both security risks to the Company (e.g. the level of crime and violence in the area of operation), as well as human rights risks to the rights holders (e.g. the history of abuse of human rights by security forces).

At the COREFCO refinery in Canada all security staff must be licensed to function in that role by the Alberta Solicitor General, which outlines all encompassing expectations, that are based on the rule of law, inclusive to respect Human Rights, and the VPs.

The COREFCO risk assessment is reviewed at four levels. The Security guard staff, the Security Supervisor, Manager of Emergency Services and Security and the Director of Loss Prevention.

A security audit completed at the refinery in 2020 examined all aspects of security risk identification, which has resulted in an update to the risk assessment and revision to security post orders to address newly considered scenarios. Historically, the potential for violence on site has been minimal, with no incidents on record. Externally, protests or other demonstrations have not occurred. Security guard certification and progressive on-the-job and on-going training, focus on risk awareness and risk assessment.

Similarly, risk assessments for Sherritt's Cuban operations identify a low potential for violence, low to moderate potential for human rights violations, a strong rule of law, and no conflict. Only incidents of minor theft were recorded in 2021. There were no incidents of violence or protest or human rights violations in or around the Cuban sites. Local security guard are provided by a state-run public security provider. All guards are trained and certified by the Cuban state.

*8. Company procedure or mechanism to report security-related incidents with human rights implications by public/private security forces relating to the company's activities*

All Sherritt sites are required to adopt the Company's Procedure for Reporting and Investigation of Security Related Incidents. The Procedure includes a classification of security incident levels (from levels 1-5, with 5 being the most critical). Allegations of human rights-related violations fall into incident levels 4 and 5 and require immediate notification to Security Management, the Site General Manager, Divisional Vice President, and corporate Legal Counsel and the Executive Leadership team. Host government authorities must be notified immediately in the case of a fatality, an injury and/or property damage. Similarly, any allegation of a security and human rights violation involving public security on site must be documented and reported to authorities. All on-site incidents result in the generation of a report that serves as a formal record of the incident, the investigation, and corrective or preventive actions.

Employees may report security-related incidents or allegations with human rights implications to their immediate supervisor, to Human Resources, or through the anonymous telephone or electronic reporting mechanisms available [here](#). External stakeholders can report security-related incidents or allegations with human rights implications through Sherritt's local grievance mechanisms or through the same anonymous mechanism listed above. In 2021, there were no incident or allegations of security-related incidents with human rights implications by public or private security forces.



At Sherritt's Cuban operations, there is a formal state-run system where citizens can file complaints against an entity, organization or enterprise whose activities they feel are adversely affecting their well-being. Commissions are set up to investigate grievances and develop action plans to address them.

In Cuba, investigations of incidents or allegations are handled by the police. Management actively monitors the status of public security investigations by liaising directly with the local police authorities. This includes, pressing for their proper resolution and identifying actions that may improve site security operations.

Interactions with Cuba's state security agency has been respectful of Cuban laws, Cuba's support for the U.N. declaration of human rights and other human rights standards. The engagement has sought to incrementally improve the alignment of state institutions with the VPs to ensure accountability and respect for human rights as part of the operation.

*9. Company procedure to consider the Voluntary Principles in entering into relations with private security providers.*

Sherritt contracts security officials and/or private or public security providers at its sites in Canada and Cuba. In Canada, the COREFCO site is licensed by the Alberta Solicitor General to operate a private security force, comprised of Sherritt employees whom hold security licenses, and contracts a private third-party security provider. In Cuba, security is provided by a state-owned security company, with management oversight.

Due to the various security arrangements of its sites, Sherritt has established procedures for entering into agreements with both private and public security. These procedures include specific contractual requirements, such as compliance with Company policies and procedures, relevant host country laws and regulations, international codes of conduct for law enforcement officials and the VPSHR.

Sites with private security (either in-house or contractor) are required to demonstrate that security personnel have been screened (to the extent possible) for past human rights' abuses and criminal records, and trained on security and human rights and the use of force. Sites must also take measures to ensure the proper handling and storage of security equipment. To ensure compliance in these areas, sites are required to measure and report on contractor performance on an annual basis, using a set of agreed-upon key performance indicators.

Sites with public security providers must take measures to ensure that public security administration does not assign public security officers who have been subject to credible allegations or violations of human rights to the sites. Such measures include

contractual requirements and the tracking of personnel assigned to the site. Sites must also seek proof of human rights and use of force training completed by personnel assigned to the site. Where training is viewed as inadequate, the sites must provide support for training in these areas. Under no circumstances are sites to transfer lethal equipment to public security and the transfer of non-lethal equipment must be made under an explicit set of conditions regarding how the equipment should be stored, handled and used.

At the Sherritt's COREFCO refinery all contract security guards must complete a training program to achieve provincial security guard licence. Additional training is provided to contract security guards by Sherritt International, which includes site and company specific requirements including the VPs-related ones.

*10. Company procedure or mechanism to address security-related incidents with human rights implications by public/private security forces relating to the company's activities.*

Sherritt has a grievance standard that all operations must follow in the design of their site-specific grievance mechanisms. All grievance mechanisms must be anonymous, consider local customs, have clear definitions, and include processes for tracking, investigation and resolution.

All grievances or allegations of a human rights violation involving public or private security personnel are reported to the Corporate Legal Counsel who will assign an external investigator to understand what occurred, what controls are in place and what additional controls are needed to prevent a similar incident from occurring in the future. The outcomes are reported to the Board of Directors and appropriate corrective action is taken as required.

Employees may report grievances to their immediate supervisor, to Human Resources, or through the anonymous telephone or electronic reporting mechanisms available [here](#). External stakeholders can report grievances through Sherritt's local grievance mechanisms or through the same anonymous mechanism listed above. All Sherritt employees and contractors are made aware of how to report grievances as part of their immediate onboarding, with regular reminders during employee and contractor engagement sessions and internal information sharing platforms (i.e. Employee Townhalls, employee portals - SharePoint, etc).

In 2021 the grievance mechanism at the COREFCO refinery was updated. The update provided better alignment of the sites grievance mechanism with Sherritt's Grievance Mechanism Standard. Training included making both internal and external stakeholders aware of its existence and promoting its use.

There were no human rights incidents, violations, or allegations at any of the Sherritt sites in 2021.

### **C. Country Implementation**

#### *11. Overview of country operations selected for reporting.*

Sherritt's Oil & Gas, and Power (OGP) operations in Cuba, the nickel and cobalt refinery in Canada (COREFCO) and mine in Cuba (Moa Nickel), are included as part of this report.

#### *12. Engagements with stakeholders on country implementation.*

Sherritt has completed a stakeholder identification and mapping exercise and prepared a stakeholder engagement plan that includes engagement with host governments, including public security agencies, and local communities about company security arrangements.

As mentioned in sections A.2 and A.3., Sherritt has conducted engagement with the Cuban state agency responsible for public security to promote the implementation of the Voluntary Principles in Cuba. Although this was limited in 2021 due to COVID-19, efforts to further engage on the VPs with the security agency and other state officials is planned for 2022.

In Canada, Sherritt's COREFCO refinery also engages regularly with the municipality of Fort Saskatchewan, local police, and the Royal Canadian Mounted Police (RCMP) regarding security arrangements. For example, in 2021 the COREFCO refinery engaged in the development of an Active Assailant security post order document with the RCMP. Local RCMP and specialized RCMP Response Team personnel were engaged in the development and review of the documents.

See section A.1 for additional information.

#### *13. Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreements with private security providers, as well as an arrangement with public security forces.*

As detailed above, Sherritt has specific procedures on entering agreements with private and public security. For information on the selection of security contractors and formulation of associated contractual agreements, please see B.7.

In Canada, Sherritt's COREFCO refinery site has an agreement in place with its private security provider, which incorporates the requirements of Sherritt's Procedure for Entering into Agreements with Private Security Providers. This includes a provision

for the ongoing identification of training programs that will meet site level needs and VPs requirements. Contracts or agreements with security providers must include: screening and training of guard force personnel with respect to Sherritt's security and human rights-related policies and procedures prior to beginning work. Annual refresher training is required as outlined in Sherritt's Security and Human Rights Guidelines Document; and compliance with Sherritt's Procedure for Entering Agreements with Private Security.

It should be noted that site security training programs are standardized in Alberta and are quite comprehensive. In Alberta, applicants for a security-workers licence (issued by the Alberta Solicitor General) must successfully complete a mandatory training course or provide proof of equivalent training in order to qualify for a security license. Training includes a module on the Canadian Charter of Rights and Freedoms, arrest, search and seizure, the Criminal Code of Canada, and the use of force.

The COREFCO site requires that all of its security guards (both employees and contractors) be licensed with the Solicitor General, as per Alberta law. The Alberta Solicitor General's licensing requirement also mandates all Security personnel have a criminal record check completed with local law enforcement. This check includes the local database, Canadian Police Information Centre and the Vulnerable Sector. In 2021, the licenses for all employee and contractor guards (including spares) were current.

The COREFCO site's Use of Force Procedure outlines how force will be used by all Security personnel in the course of their duties. It states that Security personnel should try to resolve all security incidents without the use of force. If force is used, then the use of force must comply with all relevant legislation on the matter including reporting. If Security personnel use force and that force could be described as "material force" (such as wrestling with the suspect, physical control techniques – wrist locks / arm bars etc., use of batons etc.) then that usage of force must be reported to the Province of Alberta. Section 32 of the Security Services and Investigators Act (SSIA) and section 12(5) of the Security Services and Investigators Regulations of Alberta (SSIR) outline mandatory reporting requirements to the Province of Alberta if Security personnel use "material force" in the execution of their duties.

Sherritt's Cuban operations have yet to incorporate specific VPSHR-related requirements into the contract with the security provider. The incorporation of any VPSHR-related requirements into the working arrangement with the state-owned security provider in Cuba will first require awareness building around the VPSHR with the Sherritt's state-owned joint-venture partners and the Cuban government, more broadly. Such outreach efforts were negatively impacted by COVID-19 restrictions in 2021. Sherritt will continue to work to meet directly with the state-owned security provider in Cuba in 2022 to discuss the Voluntary Principles.

*14. Examples of supporting outreach, education, and/or training of (i) relevant personnel, (ii) private security, (iii) public security, and/or (iv) civil society (e.g., local NGOs, community groups).*

Sherritt's COREFCO refinery engaged with partner organizations of the Northeast Region Community Awareness Emergency Response (NRCAER). NRCAER is a mutual aid emergency response association which includes emergency management professionals, pipeline companies, chemical transporters, area municipalities and the local public police. Weekly engagement meetings and knowledge exchanges were also held with the contract security firm.

Sherritt continues to have limited ability to influence the adoption of the VPs in Cuba by the state-owned security agency; however, Sherritt will continue to build awareness about the Voluntary Principles with our Cuban partners and relevant authorities, as appropriate.

*15. Company procedure to review progress on implementing the Voluntary Principles at local facilities.*

The indicators and relevant processes that have been developed to assess and address the company's implementation of the Voluntary Principles include the following key performance indicators:

- Number of recorded incidents with the potential to affect social licence;
- Number of recorded security incidents, including thefts and attempted thefts;
- Number of reported grievances, including human rights, social, and community ones;
- Number of hours of training, including security and human rights training;
- Number of meetings, including those with government or other stakeholders related to security and human rights.

These indicators are managed at all Sherritt operations and reviewed by Senior management and Board of Directors on a quarterly basis.

Progress on the implementation of the VPs is also reported to management and Board of Directors on a quarterly basis.

The company has also developed standardized tools for conducting site-level gap analyses against the company's Security and Human Rights Standard. These tools were rolled out to the sites as part of Sherritt's broader Sustainability Framework Implementation Plan for designing and implementing Company-wide minimum standards across sustainability-related functions, including security, and continue to be in use.

At the moment, Sherritt is not participating in the Corporate Pillar Verification Framework.

#### **D. Lessons and Issues**

*16. Lessons or issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organization.*

2021 marked eight years of Sherritt's implementation of the VPSHR in Canada. Overall, Sherritt is pleased with the uptake of this important initiative at the COREFCO refinery and the year-over-year improvement in both security performance and engagement in the VPs. Despite the low-risk of security-related human rights issues in Canada, COREFCO has embedded VPs requirements into its operating system and continually makes improvements to its systems.

Promotion of the adoption of the VPSHR in Cuba in 2021 was impacted by the COVID-19 pandemic. Awareness building and efforts towards adoption are expected to continue to progress slowly. As noted throughout this report, both Sherritt's adoption of TSM and increased customer interest in human rights are likely to create a more robust business incentive towards their formal adoption in Cuba. Sherritt remains committed to advancing implementation at its Cuba operations.

Identifying the need and benefit of training contractors and suppliers in human rights for the purposes of risk management was rolled out during the year and is expected to continue.

Specific plans to strengthen the VPSHR implementation at Sherritt in 2022 include:

##### *COREFCO refinery Canada*

- Continue participation in working groups;
- Training topics planned for security personnel in 2022 include:
  - Respectful Work Place;
  - Verbal Judo;
  - Introductory and intermediate level awareness on the VPSHR.
- Updates stakeholder engagement protocols;
- Engage internal and external stakeholders to identify opportunities for program development or new initiative exploration

##### *Mining and Oil, Gas, and Power Operations Cuba*

- Sherritt management will continue to engage with the Canadian Embassy in Cuba, the Cuban embassy in Canada, Company's joint-venture partners and the state-run security provider on the Voluntary Principles to identify

- opportunities for awareness building and implementation in Cuba;
- Continue to implement MAC's Towards Sustainable Mining program at the Moa Nickel mine.

#### *Corporate Canada*

- Sherritt will participate in the Voluntary Principles Plenary meeting in 2022;
- Continue to reference Sherritt's commitment to the VPs when responding to customer and industry association responsible sourcing surveys and questionnaires;
- Continue to reference Sherritt's commitment to the VPs in publically available Reports and presentations
- Continued support and participation in multi-stakeholder security related initiatives that aim to further promote the Voluntary Principles in Canada and internationally, including the Canada Working Group on the VPs;
- Undertake a review of its human rights and security related global policies and standards, and update as required.