

## PLATINUM GROUP METALS LTD.

### HUMAN RIGHTS POLICY

Platinum Group Metals Ltd. (“**Platinum Group**” or the “**Company**”) is committed to promoting a culture of respect for human rights and inclusion that aligns with the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, international humanitarian law and applicable local human rights legislation. We will safeguard the promotion of human rights in the workplace and integrate human rights into our due diligence and risk assessment processes, and other policies and procedures. We will assess all human rights issues, determine their severity and act upon our findings.

The Environmental, Health, Safety and Technical Advisory Committee (the “**EHST Committee**”) of the Board of Directors (the “**Board**”) of the Company shall assist the Board in the oversight of this Policy including:

- a) Reviewing the effectiveness and compliance of this Policy on a regular basis.
- b) Monitoring the Company’s performance, challenges and commitments in the prevention or mitigation of any human rights issues.
- c) Reviewing the proposed public disclosure of any Company human rights matters.

#### **Commitment**

To achieve our human rights commitments, Platinum Group will:

- Respect the rights and dignity of our employees, directors, consultants, contractors, partners and community members affected by our business.
- Create a safe, inclusive and diverse workplace where decisions are non-discriminatory towards race, color, religion, nationality, gender, gender identity, ethnicity, age, marital status, creed, sexual orientation, political beliefs, pregnancy, disability or other basis prohibited by law.
- Respect workers’ rights, including freedom of peaceful assembly and association, and engagement in collective bargaining consistent with the relevant International Labour Organization conventions on that subject.
- Take actions to raise employee awareness of international standards and guiding principles for human rights and provide regular training on this Policy.
- Engage in constructive dialogue and partnerships with our stakeholders to better understand how our activities affect their human rights.
- Establish operations-level grievance and dispute resolution mechanisms for human rights issues.
- Maintain a zero tolerance approach to the use of forced, compulsory or child labour.
- Continuously seek improvements to this Policy and other human rights related programs and procedures to further embed respect for human rights into the Company’s culture, operations and workforce.

## **Compliance**

This policy applies to Platinum Group and its wholly owned subsidiaries. Platinum Group expects that each of its wholly owned subsidiaries that conduct mining operations will establish procedures to ensure compliance with this policy. All Platinum Group board members, officers, contractors or any third-party conducting work or acting on Platinum Group's behalf will behave in a manner that respects human rights and avoids infringing upon them. Platinum Group will take appropriate measures to ensure that this policy is respected.

## **Expectation**

*Platinum Group will clearly communicate the expectation that all employees, directors, consultants and contractors will comply with this Policy.*

For Company employees, non-compliance with this Policy may be grounds for disciplinary action up to and including termination of employment. For directors, non-compliance may be grounds for case-specific disciplinary action, which may include immediate discharge or removal. For consultants and contractors, non-compliance may be grounds for contract termination.

To the extent that any joint venture is not controlled by the Company, the Company will use its influence to cause the joint venture(s) to adopt and follow policies substantially consistent with this Policy.

## **POLICY ACKNOWLEDGEMENT**

I, (insert name) \_\_\_\_\_ hereby acknowledge, having reviewed Platinum Group Metals Ltd.'s Human Rights Policy, that I understand its provisions and will respect and comply with the Policy and its intent.

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Signature

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Date