

## **ENERGY FUELS INC. HUMAN RIGHTS POLICY**

### **APPLICATION**

This Policy applies equally to (a) Energy Fuels Inc. and each of its subsidiaries and any joint ventures it manages (collectively, the “**Company**”), and (b) the Company’s directors, officers, employees, contractors and consultants, to the extent their activities relate to the Company and its businesses (collectively, “**Personnel**”). All Personnel, and all facilities owned or operated by the Company, regardless of geographic location, operational status or type of work performed, shall at all times be in full compliance with this Policy. All vendors, suppliers and partners working with the Company are expected to likewise comply with and uphold, to its fullest extent, the principles found in this Policy as they relate to the Company and its businesses and are encouraged to adopt similar policies within their own businesses.

### **RESPECT FOR HUMAN RIGHTS**

The Company maintains a fundamental respect for the human rights of its employees, the communities in which it operates and all of its stakeholders. The Company strives to adhere to the principles and commitments reflected in (1) the United Nations’ Guiding Principles on Business and Human Rights, (2) the Voluntary Principles on Security and Human Rights, (3) the OECD Guidelines on Multinational Enterprises, (4) the Convention on the Elimination of All Forms of Discrimination Against Women, and (5) the key documents constituting the International Bill of Human Rights, including (a) the Universal Declaration of Human Rights; (b) the International Covenant on Economic, Social and Cultural Rights, and (c) the International Covenant on Civil and Political Rights.

### **PRIORITIES**

The Company strictly prohibits the use of child labor or forced labor in all steps of its operations and supply chain. To the extent child labor or forced labor, or indicators of child labor or forced labor, are identified in the Company’s operations or supply chains, the Company will take appropriate action, which may include investigation, remediation and, if necessary, terminating employment or contractual agreements.

In addition, the Company has identified the following priorities, which are noted for their particular relevance to the uranium and rare earth element industries at large, as well as the regions in which the Company operates:

- Operating its facilities and carrying out its business in a manner that avoids causing or contributing to adverse human rights impacts, addresses such impacts if and when they occur and includes processes designed to identify, prevent, mitigate and remediate such impacts, as appropriate;
- Protecting the rights of vulnerable populations with a policy of respect for varying ethnic, religious, national and linguistic identities and accommodation of those groups’ respective practices and traditions;
- Developing and operating our projects in a manner that respects the rights of Indigenous Peoples, respecting the people, laws and cultures where we do business and acting to avoid or minimize adverse impacts on the rights and interests of Indigenous and other communities;
- Meaningfully engaging with internal and external stakeholders, including local communities who may be impacted by our operations;

- Complying with applicable labor laws and regulations, reinforcing our role as an equal opportunity employer and prohibiting unjust discrimination and modern slavery in all forms, including forced or compulsory labor, child labor, prison labor and human trafficking;
- Implementing security programs consistent with the Voluntary Principles on Security and Human Rights;
- Implementing operational grievance mechanisms with procedures for addressing allegations of harm, which include providing for or cooperating in remediation where appropriate;
- Conducting due diligence of relevant operations, suppliers and contractors, and requiring periodic reporting, certifications and/or training, as appropriate, consistent with this Policy; and
- Promoting awareness of this Policy and its expectations among all Personnel, suppliers, local communities and host governments.

## GRIEVANCES

This Policy is managed by Energy Fuels Inc.'s Board of Directors (the “**Board**”), together with and including the Company's President and Chief Executive Officer (the “**President & CEO**”). Any person may file a complaint or concern to the Company relating to human rights by directing such complaint or concern to the following:

Energy Fuels Inc.  
 225 Union Blvd., Suite 600  
 Lakewood, Colorado 80228 USA  
 Attn: Chief Legal Officer  
[info@energyfuels.com](mailto:info@energyfuels.com)  
 Direct: (303) 974-2140  
 Toll Free: +1 (888) 864-2125

The Chief Legal Officer will promptly provide any such complaint or concern to the Chair of the Board and to the President and CEO, who will together determine how best to address the complaint in light of all relevant facts and circumstances.

### *National Human Trafficking Hotline*

Nothing in this Policy shall be deemed to prohibit any person from utilizing the U.S. National Human Trafficking Hotline ([U.S. National Human Trafficking Hotline](#)) or similar reporting mechanism in any jurisdiction where the Company operates in the instance a human rights concern or violation is suspected or has been identified.

## SOURCES

To read the full texts of the literature cited above, please visit the following:

- [United Nations Guiding Principles on Business and Human Rights](#)
- [Convention on the Elimination of All Forms of Discrimination Against Women](#)
- [International Bill of Human Rights](#)
- [Voluntary Principles on Security and Human Rights](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [UN Declaration on the Rights of Indigenous Peoples](#)