

ATOMIC GOLD, INC.

Traders of Precious Metals

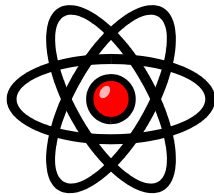
Human Rights Policy

Atomic Gold, Inc. (“Atomic Gold”) is committed to integrating human rights best practices into our business operations and decision-making processes. Atomic Gold obey the UN Human Rights Declaration and is committed to reflecting its ten principles relating to human rights, labor, environment and anti-corruption in all of our business operations.

This policy should be read in conjunction with LBMA Code of Conduct and other policies and procedures.

Further to ongoing dialogues with our stakeholders concerning the effectiveness of our initiatives, Atomic Gold makes the following commitments:

1. Atomic Gold will support, uphold and respect the protection of internationally proclaimed human rights.
2. Atomic Gold will not be complicit in human rights abuses and will continually aim to improve this policy and its human rights practices.
3. Atomic Gold will commission human rights assessments in instances where, through a comprehensive risk assessment and/or due diligence process, Atomic Gold identifies a significant risk of human rights abuses in the area where we operate or are considering operating.
4. Atomic Gold’s human rights performance, as well as appropriate information regarding any human rights assessments, will be made available to the public through annual reporting initiatives.
5. Atomic Gold will respect workers’ rights to freedom of association, equal opportunity, freedom from discrimination, peaceful protest and assembly and collective bargaining.
6. Atomic Gold will respect the rights and dignity of employees and will not allow forced, compulsory or child labor.
7. Where Atomic Gold hires private security providers to protect employees, resources and company property, it will take steps to ensure such providers have not been involved in serious human rights abuses or breaches of international humanitarian law. Any private security providers will be required to comply strictly with local and international law. Where necessary, Atomic Gold will provide human rights training to employees engaged in security functions and to any private security forces hired by us and will regularly consult with host governments and communities on the impact of our security arrangements to those communities. Atomic Gold will not hire public security forces, except in extraordinary circumstances.



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8. Atomic Gold will respect the rights and traditions of indigenous peoples where it operates by proactively seeking, engaging and supporting meaningful dialogue regarding our operations.

9. Atomic Gold will make every effort to avoid involuntary resettlement wherever possible. When relocation cannot be avoided, Atomic Gold will establish a resettlement plan aligned with the International Finance Corporation Performance Standards and in consultation with the affected communities, to minimize adverse social and economic impacts of resettlement.

10. Atomic Gold employees will be trained periodically on this Human Rights Policy.

Queries or concerns:

Any person with a question or concern about this policy may contact Atomic Gold's President, Carlos M. Ortiz at carlos.ortiz@atomicgoldinc.com.

Last reviewed and approved by the Board of Directors on June 25, 2018.