

Lumina Gold Corp. (“Lumina”) will operate in a manner that respects the human rights, values, and interests of local communities and indigenous peoples, as well as the applicable laws and regulations of El Oro Province and the Republic of Ecuador. We will manage our activities in a professional manner with a capable team that engages the local community in a spirit of mutual respect, trust, and teamwork.

We will:

- Maintain accountable business practices and a code of conduct that establishes uniform and appropriate behavioral standards for our workforce and contractors;
- Involve affected communities and stakeholders through ongoing participation and consultation, based on a commitment to mutual respect and the potential for creation of enduring benefits;
- Communicate in an open and transparent manner with local stakeholders and collaborate in good faith to understand and resolve any differences;
- Formulate strategies and procedures for managing social risks, impacts, and opportunities in consultation with local communities and other stakeholders;
- Develop mutually agreeable conditions with property owners for accessing or using land prior to beginning activities in new areas;
- Prioritize local hiring and contracting, and work to develop the capabilities of local workers as well as providers of goods and services; and,
- Work together with local communities to advance their social and economic development.

This policy will apply to all of Lumina’s employees and contractors. It shall be communicated to all of Lumina’s personnel, contractors, and external stakeholders.