

HUMAN RIGHTS POLICY

Lucara Diamond Corp. (“Lucara” or the “Company”) and its subsidiaries have adopted a Code of Business Conduct and Ethics that states that the “Company respects each individual's human rights and shall seek to foster respect and equality for all. Individuals shall not be discriminated against on the basis of factors unrelated to their ability to perform their job”.

Our Commitment

We are committed to meeting our responsibility to respect internationally recognized human rights and labour standards as defined by the United Nations Guiding Principles on Business and Human Rights. Our commitment is based on the Kimberley Process, the Responsible Jewellery Council Code of Practices (2019), and other relevant standards and market regulations. We actively participate in the United Nations Global Compact and have adopted several United Nations Sustainable Development Goals.

Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights and standards.

Governance and Scope

This policy is overseen by Lucara’s President and CEO with support from the executive team. This ensures that every part of the Company’s business is clear about the responsibility to respect human rights and to remedy any violations. Board-level oversight is provided by the Environment, Social and Governance (“ESG”) Committee of the Company.

This policy applies to Lucara and all its subsidiaries, contractors, as well as their workers and suppliers, who are required to uphold and respect for human rights and for these principles.

Stakeholder Engagement

Our core values guide our engagement activities. We are committed to respecting and listening to our people, our communities, local governments, to delivering on our promises and commitments, and to communicating with openness, honesty and transparency.

We engage in the communities on a regular basis, meeting with the people, including remote area dwellers and vulnerable and disadvantaged groups, allowing us to learn about expectations and concerns, be accountable about our operations and social investments, and identify opportunities for improvement.

Diversity and Inclusion

We believe that strength comes from diversity and are proud to be an equal opportunity employer. We are committed to building a culture of inclusivity where we welcome and recognize the unique contributions of each of our employees.

Freedom of Association and Collective Bargaining

Throughout our business practices, we uphold the freedom of association and recognize our employees’ right to form and join organizations of their own choosing and to bargain freely with our Company.

Child and Forced Labour

Lucara rejects any form of modern slavery, including forced labour, child labour and trafficking, or other labour exploitation in our activities and value chain. We endeavour to have systems in place to identify, assess and address modern slavery risks.

Safe and Healthy Workplace

Health and safety are among our core values, and part of our working culture. We are committed to creating a healthy and safe working environment for all employees, contractors and visitors, and to complying with applicable safety and health laws and regulations.

Workplace Security

We are committed to providing workplaces that are free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity. We strive to create a safe and inclusive environment for all individuals and do not tolerate any form of discrimination, harassment, and workplace violence.

Reporting

If any violation of this policy is observed, whether committed by Company employees or by others associated with the Company, it is to be reported to an immediate supervisor, or an officer of the Company, as appropriate. If it is determined that there is a violation, the employee, supervisor or officer, as applicable, shall advise the Chair of the Environment, Social and Governance (“ESG”) Committee in writing.

To report a matter in a confidential or anonymous basis, an individual may:

- In confidence, send an email to the attention of the Chair of the ESG Committee at: ethicscomplaint@lucaradiamond.com; or
- Anonymously, post the complaint or concern to the Attention of the Chair of the ESG Committee, Lucara Diamond Corp., Suite 2800, Four Bentall Centre, 1055 Dunsmuir Street, PO Box 49225, Vancouver, B.C., Canada, V7X 1L2

Following the receipt of any reports submitted hereunder, the Chair of the ESG Committee will investigate each matter so reported and report to the Board which will take corrective disciplinary actions, if appropriate, up to and including termination of employment.

There will be no reprisals against employees, officers and directors for good faith reporting of compliance concerns or violations.

Reports received by the Chair of the ESG Committee will be retained for a period of seven years.

Public Reporting

We report to the public on our human rights-related commitments, efforts and statements, consistent with this policy, as part of our annual Sustainability Report and in our Modern Slavery Act Report, published in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Our Governance

This policy is overseen by Lucara's Chief Executive Officer with support from the Executive team. This ensures that every part of our business is clear about the responsibility to respect human rights and to remedy any violations. Board-level oversight is provided by the ESG Committee of the Company.

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