



## 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

Respect for human rights is of fundamental importance to the Company. The Company strives at all times to embody and employ the guiding principles memorialized in (i) the United Nations’ Guiding Principles on Business and Human Rights, (ii) the Convention on the Elimination of All Forms of Discrimination Against Women, and (iii) 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 supply chain. The Company shall ensure that in all of its business and contractual relationships: (a) any use of child labor or forced labor in any steps of the Company’s supply chain shall result in the immediate termination of employment or contractual agreement with the offending party, without liability to the Company; and any alleged or actual use of child labor or forced labor shall constitute adequate grounds for the Company to provide notice to government officials and/or law enforcement for further investigation and prosecution, if appropriate.

In addition, the Company has identified the following human rights priorities, which are noted for their particular relevance to the uranium industry at large, as well as the regions in which the Company operates:

- ❖ Protection of minority groups’ rights, with a policy of respect for varying ethnic, religious, national and linguistic identities and accommodation of those groups’ respective practices and traditions. The existing federal, state and local laws and licenses, permits, and applicable Plans of Operations, including associated U.S. National Environmental Policy Act (“**NEPA**”) and other environmental analyses, relating to the Company’s facilities ensure that the Company operates its facilities and carries on its business in a manner that:
  - avoids infringing on the human rights of others and that addresses any adverse human rights impacts;
  - avoids causing or contributing to adverse human rights impacts through the Company’s activities and addresses any such impacts if and when they occur; and
  - requires the Company to have in place policies and processes to identify, prevent, mitigate and remediate any adverse human rights impacts caused or contributed to by the Company or any of its facilities.

- ❖ Protection of women’s rights, with a goal of diversifying job opportunities for women in the mining industry; and
- ❖ Economic inclusion for suppliers and vendors with equal opportunities for employing individuals and businesses from the rural communities in which we operate, as well as members of nearby tribal nations.

## OTHER CONSIDERATIONS

The Company is not aware of any known or suspected risks of human trafficking or slavery in its supply chain and, thus, does not find it necessary to dedicate concrete efforts towards addressing such concerns at this time.

The Company is committed to a fair or living wage for all employees.

The Company has not suffered any controversy, major or otherwise, linked to human rights or corruption.

## 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 good-faith 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: Corporate Secretary

The Corporate Secretary 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.

## SOURCES

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

- *United Nations’ Guiding Principles on Business and Human Rights*  
[https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)
- *Convention on the Elimination of All Forms of Discrimination Against Women*  
<https://www.ohchr.org/en/professionalinterest/pages/cedaw.aspx>
- *International Bill of Human Rights*  
<https://www.eschr-net.org/resources/international-bill-human-rights>