



Aclara Resources Inc.
Suite 1700, 666 Burrard Street
Vancouver, British Columbia, Canada

CIVIL SECURITY POLICY

POLICY STATEMENT

Aclara Resources Inc. (“Aclara” or the “Company”) is committed to the safety of its people, whether directly employed or contractor personnel, as well as other stakeholders such as suppliers and local communities. The Company also seeks to protect its operations and assets. Both commitments are made in full respect of human rights, in alignment with local laws and the Voluntary Principles on Security and Human Rights (the “Principles”).

This policy applies generally to the Company’s employees, contractors, and suppliers, and specifically to its civil security personnel and suppliers that provide security services.

RESPECT FOR HUMAN RIGHTS AND COMPLIANCE WITH LAWS AND STANDARDS

The Company is committed to respecting human rights throughout its operations. Civil security personnel will always act with professionalism and respect for human rights and all civil security activities will comply with the laws and regulations in force in each host country, as well as with the Principles.

The Company will conduct periodic human rights due diligence related to security activities to identify, prevent, mitigate and address potential adverse impacts.

RISK-BASED APPROACH

Civil security measures will be based on a detailed risk assessment, which will consider threats to personnel, facilities, communities, contractors, human rights, among other factors.

Security and human rights risk assessments shall be reviewed periodically and whenever material changes occur in the operating environment.

CIVIL SECURITY PERSONNEL MANAGEMENT

Background checks and vetting will be conducted on members of civil security staff through publicly available databases to ensure their suitability and the safety of those based in Company premises.

Whenever possible and under strict compliance with local laws, screening processes shall include verification of professional qualifications, previous conduct, criminal records where legally permissible, and any credible allegations of human rights abuses.



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Civil security staff will receive appropriate training on human rights, proportional use of force, conflict management, and cultural sensitivity.

All contracted security providers shall be required to comply with this Policy and the Voluntary Principles on Security and Human Rights. Compliance requirements shall be incorporated into contractual arrangements and monitored periodically.

Aclara will not tolerate or support any form of human rights abuse, corruption, or misconduct, which will result in disciplinary action being taken, including immediate dismissal.

ENGAGEMENT WITH COMMUNITIES AND STAKEHOLDERS

The Company will maintain transparent and respectful communication with local communities and stakeholders regarding civil security arrangements.

Community and stakeholder concerns related to civil security will be addressed promptly and constructively.

Collaboration with public security forces will be conducted in alignment with the Principles.

USE OF FORCE

Civil security personnel shall carry out their duties in a preventive manner and shall not exercise law enforcement functions. The use of force shall be permitted only where authorized by applicable law, as a measure of last resort, and shall be limited to what is strictly necessary and proportionate to protect persons or property, in accordance with applicable legal requirements and approved security procedures.

Civil security personnel shall only employ the use of force as a last resort which will be limited to the minimum level necessary and proportionate to the protection of its people and property.

The use and carrying of firearms and other weapons shall only be permitted where expressly authorized by applicable law, subject to all required permits, approvals, training, and operational controls, and in strict compliance with the legal requirements of the relevant jurisdiction.

MONITORING AND REPORTING INCIDENTS

All security incidents, and particularly those with possible human rights impacts, shall be reported, investigated, and documented transparently.

Aclara encourages the use of reporting mechanisms, such as the Company's whistleblowing system, for grievances related to civil security practices.



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All allegations of human rights abuse, excessive use of force, harassment, intimidation, corruption, or misconduct involving security personnel shall be investigated promptly and impartially.

Serious security incidents shall be reported to senior management and periodically summarized for Board-level oversight.

CONTINUOUS IMPROVEMENT

Reviews will be conducted periodically to improve civil security performance and alignment with the Principles.

Accessible grievance mechanisms shall be available for communities and stakeholders to raise concerns related to security activities.

Ramon Barua
CEO