



PHOENIX METALS CORP.

ENVIRONMENTAL, HEALTH AND SAFETY POLICY

1. Introduction

The board of directors of Phoenix Metals Corp. (the “**Company**”) has established this policy regarding environmental, health and safety (“**EHS**”) matters.

The Company is committed to protecting the environment, as well as the health and safety of its directors, officers, employees, and consultants (collectively, “**Representatives**”), and the communities in which the Company operates. The Company is committed to conducting its operations in an environmentally sound and sustainable way. All aspects of the Company’s business will be managed in a safe and environmentally responsible manner, consistent both with good business practices that provide a competitive return on investment and the principles set forth in this policy.

2. Management Commitment

All levels of the Company’s management are committed to the development, implementation, maintenance and continual improvement of the EHS programs at the Company. Management of the Company believes that it is their responsibility to set the expectations and assure adherence to Company policy, and will act accordingly. Management will ensure that EHS policies, programs and performance standards are an integral part of the Company’s planning and decision-making.

Management places concern for the environment, health and safety of Representatives and the communities in which the Company operates at the forefront of Company policies and decisions. Management will provide and maintain safe and healthy working conditions and will follow operating procedures that safeguard Representatives and the communities in which they work. EHS programs that are compliant with regulatory standards will be provided.

To effectively meet the Company’s commitments under this policy, the Company and management will:

Comply with applicable EHS laws and regulations at all times; at all locations; and at all stages of exploration, development, operations and closure;

Implement, document and maintain formal EHS management systems that are aligned with applicable international standards;

Identify, assess, monitor, control, and manage significant EHS risks associated with its activities;

Ensure that all directors, officers, employees and contractors understand their EHS responsibilities and create an environment conducive to adhering to the Company’s policies, procedures and applicable regulations;

Identify potential EHS emergencies; implement, maintain, and regularly test emergency response plans;

Establish clear and meaningful EHS objectives and targets aimed at continuously improving EHS performance;

Maintain a constructive dialogue with local communities and other stakeholders on environmental and social issues;

Implement programs to prevent pollution, including measures to effectively reduce and manage wastes;

Decommission and reclaim operating sites in a systematic and timely manner;

Educate employees and contractors on EHS matters so they can better understand their role in meeting the commitments of this policy, within their own areas of responsibility;

Conduct regular audits of the EHS management systems and programs;

Continuously review EHS achievements and technology to share and promote implementation of best practices;

Communicate the progress made in improving EHS performance to employees, contractors, the public, government and other communities of interest.

3. Compliance

Management will comply with applicable EHS laws and regulations, and shall consider compliance with the law to be the minimum standard. Representatives are responsible and accountable for compliance and have an obligation to bring forward issues to management for resolution.

4. Planning and Assessment

The Company will integrate EHS considerations into its business using the innovation, creativity and ingenuity of Representatives and management. Capital projects and operating plans will be reviewed by management in terms of this policy and in concert with the objectives and targets developed as a result of the policy. Appropriate programs will be implemented, maintained, and internally evaluated to ensure consistency with this policy.

This policy will be provided to all Representatives via written communication, meetings and/or other media or forums. The Company requires Representatives at all levels to follow EHS procedures appropriate to their function, and encourages Representatives to participate proactively in EHS programs at the Company. Contractors and visitors to Company sites will be informed of this policy by posting to the Company's website at [•] and the Company will require compliance from contractors and visitors while they remain within Company facilities and when they are performing work for the Company.

5. Reporting

It is the duty of each Representative to comply with this policy and cooperate with management to ensure a safe workplace. Representatives are encouraged to report any EHS incidents, accidents, injuries, unsafe equipment, practices or conditions immediately to a supervisor or other designated person. All such reports & complaints will be treated diligently, and if required in a confidential manner.

Dated: May 15, 2026

Approved by: Board of Directors