

Summary of Focus Minerals Ltd Diversity Policy Effective April 2016

1.1. The Company believes that encouraging diversity is important for enhancing the Company's performance through enabling the contributions of diverse skills and talent from its employees.

1.2. Board of Directors maintains responsibility for fostering a culture within the Company where individual differences are respected, employment opportunities are based on merit, skill and ability, and where inappropriate attitudes, behaviours and practices at all levels within the Company and its subsidiaries are confronted and eliminated.

1.3. The Company encourages diversity in employment and in the composition of the Board, as a mechanism to ensure that the Company is able to draw on a variety of skill, talent and previous experiences in order to maximise the Company's performance. Practical examples of implementation of this Board objective are:

1.3.1. Employment: The Board monitors and ensures that there are appropriate selection criteria used when employing new members of staff, which are based on diverse skills and experience. Discrimination will not be tolerated in any recruitment documents or practices.

1.3.2. Training: Opportunities to train and advance careers for employees is based on the merit and experience of employees and Company's requirements. Discrimination will not be tolerated in any training opportunity selection or practice.

1.3.3. Gender Diversity: The Board will focus on the participation of women on the Board and within senior management. The Board will set objectives for achieving gender diversity at these levels in a way that is capable of being measured, with annual disclosure of the objectives and achievement of the objectives in each financial year. Examples of objectives which are capable of being measured are:

- (a) setting targets for the number of women employed in particular roles;
- (b) comparing numbers of men and women employed in those specified roles; and
- (c) comparing the remuneration of men and women are employed in those roles;

1.3.4. Freedom from harassment: The Board will ensure that all employees in all roles have access to a work environment free from harassment by other employees in all roles. Channels of complaint will be made available to allow for confidential sympathetic treatment by the Company of any allegations of harassment, and to allow for both complainant and the alleged transgressor to be heard promptly, fairly and overseen by a Board member who is impartial to both individuals.

1.4. Reporting breaches of Diversity Policy: All employees are responsible to comply with the diversity policy and report breaches. The Board is will monitor compliance by the Company with the diversity policy.