



Hycroft Mining Holding Corp. 2023 ESG Report

Published on June 11, 2024

Hycroft Mining Holding Corporation is a US-based gold and silver company exploring and developing the Hycroft Mine, one of the world's largest precious metals deposits located in northern Nevada, a Tier-1 mining jurisdiction.

[Disclaimer and Forward Looking Statements](#)

Company Profile

Organizational Profile

Name	Hycroft Mining Holding Corp.
Describe nature of activities, brands, products and services	After a long history of oxide heap leaching operations, the Company is focused on completing the technical studies to transition the Hycroft Mine into a milling operation for processing the sulfide ore. In addition, the Company is engaged in a robust exploration drill program to unlock the full potential of our expansive +64,000-acre land package, of which less than 10% has been explored. In 2023, Hycroft announced the discovery of a new high-grade silver system within the known resource area and the delineation of two new high-grade silver trends. These discoveries represent a significant new value driver for the Hycroft Mine that the Company is following up on with additional drilling in 2024.
Link to Corporate Website	https://hycroftmining.com/
Industry Classification	NAICS: 21 Mining, quarrying, and oil and gas extraction 212 Mining and quarrying (except oil and gas) 21222 Gold and silver ore mining 212220 Gold and silver ore mining ISIC: B0729 Mining of other non-ferrous metal ores
Market Capitalization	\$0-\$100Million USD
Type of Operations	Gold and Silver Mining Company
Company Headquarters	Virtual, United States of America

ESG Accountability

Role and Name of highest authority within company for Environment, Social and Governance strategy, programs and performance	David Thomas, SVP Operations & General Manager
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GRI Reporting Requirements

Choose the statement as to how the organization has aligned their reporting utilizing GRI Standards	The organization has reported with reference to the GRI Standards for the period defined below This is the first year reporting utilizing GRI Standards.
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ESG Reporting Period

Unless otherwise noted, all data contained in this report covers the following period		
	From	2023-01-01
	To	2023-12-31

External Assurance

Describe your company's policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved	Hycroft is fully compliant with state and federal governing bodies. Senior Management has signed off on the commitment to operational excellence.
Has the report been externally assured	No
Financial Reporting Period	
Does the financial reporting period align with the sustainability reporting period (eg. calendar vs fiscal)	Yes
Geographic Scope of Report	
Unless otherwise noted, the data in this report covers sustainability matters related to the following locations of operations	United States of America
 <p>State of Nevada - Project Location</p>	
Identify notable exclusions of the geographical and/or business scope of the report, and reference of any existing or planned reports that do or will address these (e.g., assets recently divested or acquired, non-managed joint ventures, specific exploration activities, recently closed sites, etc.)	None.
Reporting Practice	
Is the data and assumptions used in preparing the sustainability-related financial disclosures consistent (to the extent possible considering the requirements of IFRS Accounting Standards or other applicable GAAP) with the corresponding data and assumptions used in preparing the related financial statements.	Yes
Provide the full contact details (name, title, address, email and/or phone number) for an individual responsible to address questions regarding the report or its contents	<p>David Thomas, SVP and General Manager</p> <p>E: david.thomas@hycroftmining.com</p> <p>T: +1 (775) 623-5260</p>
Currency	
Unless otherwise noted, all financial figures referenced in this report are in the following currency	USD
Membership of Associations	
List of the industry associations, other membership associations, and national or international advocacy organizations in which the organisation participates in a significant role, as well as any economic, environmental, and social charters, principles, or other programmes that the organisation subscribes to or supports, such as the United Nations Global Compact (UNGC), etc.	Society of Mining Engineers; Nevada Mining Association
Scale of the Organization	
Describe how the organization defines its "Operation"	Hycroft Mining is a gold and silver exploration and development company that owns the Hycroft Mine in the prolific mining region of Northern Nevada. We currently have 77 employees.
Report the total number of operations	1
 <p>Hycroft Mine</p>	<p>The Hycroft Mine consists of 30 private parcels with patented claims that comprise approximately 1,787 acres, and 3,247 unpatented mining claims that encompass approximately 62,298 acres. The combined patented and unpatented claims comprise approximately 64,000 acres. On May 15, 2023, the Company expanded its holdings by acquiring a 50% undivided interest in three additional mining claims, totaling approximately 60 acres.</p> <p>Existing facilities on-site include two administration buildings, a mobile maintenance shop, a light vehicle maintenance shop, a warehouse, three Heap Leach Pads (Crofoot, North, and Brimstone), primary, secondary, and tertiary crushing systems, two Merrill-Crowe process plants, and a refinery. Slopes on the historic Crofoot Heap Leach Pad are being re-</p>

graded in accordance with the reclamation plan approved by the BLM. It is considered that the other existing components of the mine property may be utilized for future development. The Hycroft Mine operates under permit authorizations from the BLM, NDEP, NDOW, Nevada Department of Water Resources ("NDWR"), and County agencies.

Report the quantity of products or services provided during the reporting period and provide description (e.g. number of units produced, amount of primary commodity produced, number of services provided, etc.)

The Company currently has no commercial mining operations or sustaining revenue from the exploration, development and care and maintenance operations currently conducted at the Hycroft Mine.

Our property, the Hycroft Mine, historically operated as an open-pit oxide mining and heap leach processing operation and is located approximately 54 miles northwest of Winnemucca, Nevada. Mining operations at the Hycroft Mine were restarted in 2019 on a pre-commercial scale and discontinued in November 2021 as a result of the then-current and expected ongoing cost pressures for many of the reagents and consumables used at the Hycroft Mine and to further determine the most effective processing method for the sulfide ore. We do not expect to generate revenues from gold and silver sales until after further developing the Hycroft Mine and recommencing mining and processing operations.

Fragile and Conflict-Affected Situations

Identify all of the entity's countries of operations that align with the World Bank's list of "Fragile and Conflict-Affected Situations"

None

Mineral Resource Types in Scope

Which of the following mineral resource types are covered by this report

- Inferred
- Indicated
- Measured

The Hycroft Mine has measured and indicated mineral resources of 10.6 million ounces of gold and 360.7 million ounces of silver and inferred mineral resources of 3.4 million ounces of gold and 96.1 million ounces of silver, which are contained in oxide, transitional, and sulfide ores. (2023 Hycroft TRS)

[Hycroft Mine Mineral Resources](#)

Mineral Reserve Types in Scope

Which of the following mineral reserve types are covered by this report

None

Strategy

Link to company's statements of: Purpose, Vision, Mission and Values; Sustainability/ESG strategy (URL)

<https://hycroftmining.com/sustainability/overview/>

Provide a statement from the highest governance body or most senior executive of the organization (i.e., CEO, chair, or equivalent senior position) about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development. (CEO's message for this report)

Please refer to the CEO Statement attached.



Diane Garrett, CEO



CEO Statement

Material Topics

Governance of Material Topics

Describe the process followed to determine the organization's material topics	Management conducts a quarterly risk analysis internally and with input from the Board of Directors.
How did the organization identify the material topics	<ul style="list-style-type: none"> • Financial statement analysis • Materiality Assessment • Environmental impact assessment
How did the organization prioritize the impacts based on their significance	Risk prioritization based on permitting, legal and regulatory requirements and economic outcomes.
Specify the stakeholders and experts whose views have informed the process of determining its material topics and provide details	<ul style="list-style-type: none"> • Employees and other workers • Governments • Local communities • Shareholders and other capital providers • Suppliers
List the organization's material topics	<ul style="list-style-type: none"> • Local Communities • Human Rights and Rights of Indigenous People • Water and Effluents • Air Emissions & Pollution • Greenhouse Gas Emissions • Closure or Decommissioning • Workforce Health and Safety
List the organization's non-material topics	<ul style="list-style-type: none"> • Child Labour • Forced or Compulsory Labour • Land Acquisition and Involuntary Resettlement • Equal Remuneration for Women and Men • Diversity, Equal Opportunity & Inclusion • Community Health, Safety, and Security • Living Income and Living Wage • Biodiversity • Security
Provide reasons for considering such topics not material, provide details	<p>Other, please specify</p> <p>The non-material topics listed are still very important factors that play a role in the permitting process and our daily activities. Due to the exploration and engineering stage of our company and the location of our asset, we believe that they do not have a material impact on our current activities.</p>
Report changes to the list of material topics compared to the previous reporting period	Hycroft is submitting this initial report for 2023.
For the top 5 material topics, the reporting organization shall report the following information:	
Topic #1	Workforce Health and Safety
An explanation of why the topic is material; describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights	Our employees are our most valuable asset and thus safety is the central focus of our business operations. It protects our most valuable asset - as well as our shareholders' investment.
How is the topic connected to the entity's strategy and financial performance	A good safety culture attracts talent and protects our workforce and shareholders.
Where the impacts occur	Impacts may occur throughout our daily activities.
Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships	Both activities and business relationships
Describe/provide a link to the corporate policies or commitments regarding the topic	<p>Please refer to our Sustainability Policy at the link provided below.</p> <p>Sustainability Policy</p>

Explain how the organization manages the topic and actions to prevent or mitigate potential negative impacts	Extensive and ongoing safety training for our employees, contractors, vendors, and any other visitor coming to site.
Describe actions to address actual negative impacts, including actions to provide for or cooperate in their remediation	Any employee has the right and ability to shut the operation down if a perceived or real unsafe condition is occurring or about to occur, e.g., "miners' rights".
Describe actions to manage actual and potential positive impacts	Engaged in continuous improvement of our safety culture.
Report the processes used to track the effectiveness of the actions;	<ul style="list-style-type: none"> • Internal auditing • External auditing or verification • Impact assessments • Measurement systems • Benchmarking • External performance ratings • Stakeholder feedback • Grievance mechanisms
Report the goals, targets, and indicators used to evaluate progress;	Corporate goal is 0 TRIFR and 0 LTI and exceeding industry average standard rating.
Report the effectiveness of the actions, including progress toward the goals and targets; any related adjustments	The Company has achieved over 1.4 million man hours worked without an LTI surpassing the industry standard.
Lessons learned and how these have been incorporated into the organization's operational policies and procedures	Mandatory behavioral safety training programs with aggressive employee engagement and continuous improvement in systems.
Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective	<p>All stakeholders have input to the continuous improvement program by identifying hazards and unsafe conditions.</p> <p>In addition, the above is supported by our daily and monthly site wide safety meetings.</p>
Topic #2	Water and Effluents
An explanation of why the topic is material; describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights	<p>Hycroft is currently an exploration and development company and is obligated to perform regular monitoring, sampling, and reporting activities to Nevada Department of Environmental Protection (NDEP).</p> <p>In 2023, Hycroft had zero non-conformances and zero violations from the water samples collected at the monitoring wells around the site. However, in the future, Hycroft may have operations with the potential to positively and negatively affect this environmental resource. Hycroft is mindful of the necessary environmental conservation measures required to manage water. Wherever possible, Hycroft will instill a mandate of high-quality management practices to reuse, recycle, and reduce water consumption as an example of our commitment to responsible mining. In the future, challenges will emerge, but Hycroft will address these by installing state of the art technical equipment, practices, procedures, and people capable of minimizing any negative impacts to the local community and aquatic habitats. Addressing these challenges remains pivotal for ensuring economic development with environmental and social considerations.</p>
How is the topic connected to the entity's strategy and financial performance	Maintaining environmental compliance, including water management is a key priority for Hycroft.
Where the impacts occur	Impacts may occur as a result of direct activities under the Company's operational control.
Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships	Activities
Describe/provide a link to the corporate policies or commitments regarding the topic	Please refer to our Sustainability Policy at the link provided below.

Explain how the organization manages the topic and actions to prevent or mitigate potential negative impacts	Hycroft is a zero-discharge site for water. Therefore all wastewater must be treated and/or contained within the existing facilities, unless otherwise formal permitted exceptions granted through the regulatory agencies.
Describe actions to address actual negative impacts, including actions to provide for or cooperate in their remediation	Please refer to the answer provided above.
Describe actions to manage actual and potential positive impacts	Not applicable to this topic in this reporting period.
Report the processes used to track the effectiveness of the actions;	<ul style="list-style-type: none"> • Internal auditing • External auditing or verification • Measurement systems
Report the goals, targets, and indicators used to evaluate progress;	Hycroft Mining strives for zero noncompliances issued from the overseeing regulatory agencies.
Report the effectiveness of the actions, including progress toward the goals and targets; any related adjustments	In 2023, there were zero environmental noncompliances issued from the overseeing regulatory agencies.
Lessons learned and how these have been incorporated into the organization's operational policies and procedures	Not applicable to this reporting period.
Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective	Not applicable to this reporting period.
Topic #3	Air Emissions & Pollution
An explanation of why the topic is material; describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights	<p>Hycroft is currently an exploration and development company and is obligated to perform regular monitoring, sampling, and reporting activities to Nevada Department of Environmental Protection (NDEP).</p> <p>In 2023, Hycroft had zero non-conformances and zero violations from the air samples collected at the monitoring wells around the site. However, in the future, Hycroft will have operations with the potential to positively and negatively affect this environmental resource. Hycroft is mindful of the necessary environmental conservation measures required to manage air and dust emissions. Wherever possible, Hycroft will install air control devices and procedures to reduce negative emissions as an example of our commitment to responsible mining. The company will train operators to recognize harmful conditions and proactively implement practices that will control air emissions. The company recognizes that there will be changes in environmental conditions that will require the installation of state-of-the-art technical equipment, practices, procedures, and people capable of minimizing any negative impacts to the local community and avian habitats. Addressing these challenges remains pivotal for ensuring economic development with environmental and social considerations.</p>
How is the topic connected to the entity's strategy and financial performance	Maintaining environmental compliance, including air and pollution control management is a key priority for Hycroft.
Where the impacts occur	Impacts may occur as a result of direct activities under the Company's operational control.
Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships	Activities
Describe/provide a link to the corporate policies or commitments regarding the topic	Please refer to our Sustainability Policy at the link provided below. Sustainability Policy

Explain how the organization manages the topic and actions to prevent or mitigate potential negative impacts	Hycroft has established baseline limits for air and pollution emissions. Hycroft is an exploration company with very low potential for air and pollution emissions. However, air and pollution monitoring stations are in place to measure and report these conditions to the regulators. Operators are trained to recognize high dust opacity conditions and to implement necessary corrective action up to and including, terminating the use of equipment, redirecting traffic flow, and / or changing road conditions by adding a topical solution.
Describe actions to address actual negative impacts, including actions to provide for or cooperate in their remediation	Please refer to the answer provided above.
Describe actions to manage actual and potential positive impacts	Not applicable to this topic in this reporting period.
Report the processes used to track the effectiveness of the actions;	<ul style="list-style-type: none"> • Internal auditing • External auditing or verification • Stakeholder feedback • Grievance mechanisms • Measurement systems
Report the goals, targets, and indicators used to evaluate progress;	Hycroft Mining strives for zero noncompliances issued from the overseeing regulatory agencies.
Report the effectiveness of the actions, including progress toward the goals and targets; any related adjustments	In 2023, there were zero environmental noncompliances issued from the overseeing regulatory agencies.
Lessons learned and how these have been incorporated into the organization's operational policies and procedures	Not applicable to this reporting period.
Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective	Not applicable to this reporting period.

Supply Chain

Provide a description of the organization's supply chain, including the types of suppliers (e.g., equipment, consumables, logistics, brokers, contractors, wholesalers, etc.)	<p>Heavy equipment repair and service parts.</p> <p>Hycroft Resources suppliers provide maintenance, repair and operational (MRO) goods and services related to the mining industry. Typical purchases include mining equipment repair and service parts, e.g. filters, pumps, valves, pipe, fittings; bulk reagents / chemicals, bulk diesel fuel, gasoline, etc.</p> <p>Purchases are typically direct to a local supplier, distributor, or manufacturer's representative. Large capital purchases, e.g. mill / process equipment, may be made direct to the manufacturer.</p>
Total estimated number of suppliers throughout its supply chain and in each tier (e.g., first tier, second tier)	2,699
Estimated number of first tier suppliers	2,699
Estimated number of second tier suppliers	0
Estimated number of third tier suppliers	0
The types of activities related to the organization's products and services carried out by its suppliers (e.g., manufacturing, providing consulting services)	<ul style="list-style-type: none"> • Mobile Equipment • Spare Parts • Construction materials • Chemicals • Others, please specify • Suppliers provide goods, repair parts and replenishment MRO inventory items. • A number of suppliers provide repair / rebuild services for equipment. • We have rental agreements with suppliers for equipment we don't have. • We utilize a number of consultants who

	provide industry expertise for the mining industry, e.g. environmental specialists.
What is the nature of its business relationships with its suppliers	<ul style="list-style-type: none"> • Short-term • Contractual • Non-contractual • Event-based • Project-based
The sector-specific characteristics of its supply chain	<ul style="list-style-type: none"> • Labour-intensive • Other, please specify • Suppliers provide goods, repair parts and replenishment MRO inventory items. • A number of suppliers provide repair / rebuild services for equipment. • We have rental agreements with suppliers for equipment we don't have. • We utilize a number of consultants who provide industry expertise for the mining industry, e.g. environmental specialists.
The estimated monetary value of payments made to all suppliers (currency, Millions)	5.000 In 2023, total goods and services spent on suppliers, contractors, service providers and rental equipment was approximately \$4.6M USD.
The geographic location of its suppliers	United States of America

Environment

Climate Change - Stewardship

Strategy

Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning	Yes Hycroft's focus on exploration and development for extraction of gold and silver metals is aligned with the demand for green technologies, especially silver which is used in solar power generation and a wide range of electronics. At this time, we haven't conducted a focused climate-related risk assessment due to our current focus on resource estimation. However, we acknowledge the importance of climate considerations for mine design and risk management. In addition, our projects are subject to various federal and state laws and regulations governing protection of the environment. These laws and regulations are continually changing and, in general, are becoming more restrictive, which exposes our operations to transitional climate risk.
Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities	No - important but not an immediate business priority Hycroft recognizes that the potential physical impacts of climate change on the Company's development activities or future operations are highly uncertain and would be particular to the areas in which the Company operates. These climate changes may include changes in rainfall and storm patterns and intensities, water shortages, and changing temperatures. These changes in climate could materially adversely affect mining operations, including by affecting the moisture levels and pH of ore on leach pads, could materially and adversely affect the cost to construct and operate the Hycroft Mine, and materially and adversely affect the Company's financial performance and operations.

Risk Assessments

Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business	No - risks exist, but none with potential to have a substantive financial or strategic impact on business
Opportunity Assessments	
Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business	Other, please specify Hycroft is assessing the opportunity to convert SO2 emissions into sulfuric acid production. This would reduce future harmful air emissions into a saleable product.
Business model and value chain	
Describe the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain	Minimal
Describe where in the entity's business model and value chain climate-related risks and opportunities are concentrated (for example, geographical areas, facilities and types of assets)	Minimal Hycroft is an exploration company on an ore body that is millions of years old. Climate changes have minimal impact on our ability to assess the terrain, identify drilling targets, drill the ore body, and / or assess the drill core. We recognize that climate changes have occurred in the past and may occur in the future. However, these changes will have minimal impact on the current business.
Strategy and decision-making	
Disclose current and anticipated changes to the entity's business model, including its resource allocation, to address climate-related risks and opportunities (for example, these changes could include plans to manage or decommission carbon-, energy- or water-intensive operations; resource allocations resulting from demand or supply-chain changes; resource allocations arising from business development through capital expenditure or additional expenditure on research and development; and acquisitions or divestments)	Future Process Plant design will seek to maximize recyclable water, minimize fuel consumption, and sale by-products including power back to the grid.
Disclose current and anticipated direct mitigation and adaptation efforts (for example, through changes in production processes or equipment, relocation of facilities, workforce adjustments, and changes in product specifications)	Future equipment selection will focus on minimizing fuel and power consumption.
Risk management: Processes and policies	
What is the extent to which, and how, the processes for identifying, assessing, prioritising and monitoring climate-related risks and opportunities are integrated into and inform the entity's overall risk management process	Climate-related risks are included in the risk registry with all of the other business and operational risks.

Greenhouse Gas Emissions

Scope 1

Disclose the entity's absolute gross greenhouse gas (GHGs) emissions generated during the reporting period, expressed as metric tonnes of CO₂ equivalent (tonne CO₂-e)

Fuel related (CF ₄) (tonne CO ₂ -e)	0.298
Fuel related (N ₂ O) (tonne CO ₂ -e)	0.059
Carbon dioxide (CO ₂) (tonne CO ₂ -e)	7,764.098
Methane (CH ₄) (tonne CO ₂ -e)	7.450
Nitrous oxide (N ₂ O) (tonne CO ₂ -e)	17.582
Hydrofluorocarbon-23 (CHF ₃) (tonne CO ₂ -e)	0.000
Hydrofluorocarbon-32 (CH ₂ F ₂) (tonne CO ₂ -e)	0.000
Sulphur hexafluoride (SF ₆) (tonne CO ₂ -e)	0.000
Nitrogen trifluoride (NF ₃) (tonne CO ₂ -e)	0.000
Perfluoro methane (CF ₄) (tonne CO ₂ -e)	0.000
Perfluoro ethane (C ₂ F ₆) (tonne CO ₂ -e)	0.000
Perfluoro butane (C ₄ F ₁₀) (tonne CO ₂ -e)	0.000
Perfluoro hexane (C ₆ F ₁₄) (tonne CO ₂ -e)	0.000

The total amount of gross global Scope 1 GHG emissions (CO ₂ -e) (tonne)	7,789.130
The percentage of its gross global Scope 1 GHG emissions that are covered under an emissions-limiting regulation or program that is intended to directly limit or reduce emissions, such as cap-and-trade schemes, carbon tax/fee systems, and other emissions control (e.g., command-and-control approach) and permit-based mechanisms	0.0000%
Discuss any change in its Scope 1 emissions from the previous reporting period, including whether the change was due to emissions reductions, divestment, acquisition, mergers, changes in output, and/or changes in calculation methodology (i.e. any changes the entity made to the measurement approach, inputs and assumptions during the reporting period and the reasons for those changes, if any)	This is our first fiscal year reporting our Scope 1 emissions.
In the case that current reporting of GHG emissions to the CDP or other entity (e.g., a national regulatory disclosure program) differs in terms of the scope and consolidation approach used, describe the differences and provide those reported emissions.	There is no difference in scope or consolidation.
The entity may discuss the calculation methodology for its emissions disclosure, such as if data are from continuous emissions monitoring systems (CEMS), engineering calculations, or mass balance calculations	Greenhouse Gas (GHG) emission values are calculated from fuel consumption at the Hycroft Mine site.
Discuss short-term, medium-term and long-term strategy or plan to manage its Scope 1 greenhouse gas (GHG) emissions	At present, our emissions predominantly come from the utilization of diesel in our site maintenance and exploration machinery. We anticipate a potential increase in emissions during the production stage, we recognize it is imperative to explore alternative measures to minimize our overall Scope 1 greenhouse gas emissions. This strategy aligns with our commitment to proactively address our environmental impacts and seek sustainable solutions as we progress into production.
Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source	Greenhouse Gas (GHG) calculations utilize EPA emission factors in accordance with the Greenhouse Gas (GHG) Protocol.
Scope 2	
If company specific calculations are not available, disclose the gross location-based energy indirect (Scope 2) global greenhouse gas (GHG) emissions to the atmosphere (tonne CO ₂ -e):	
Does the company purchase externally supplied energy (grid electricity)	Yes
Report the total electricity purchased from external suppliers for the reporting year in gigajoules (GJ)	40,216.187
In what jurisdiction is the source of energy (utility) located	United States of America
Conversion factor (see Guidance):	0.325
Total amount of Scope 2 GHG emissions from purchased electricity (CO ₂ -e) (tonne)	3,630.631
Does the company purchase externally supplied heat	No
Does the company purchase externally supplied steam	No
Does the company purchase externally supplied cooling	No
The total amount of gross global Scope 2 GHG emissions (CO ₂ -e) (tonne)	3,630.631
Discuss any change in its Scope 2 emissions from the previous reporting period, including whether the change was due to emissions reductions, divestment, acquisition, mergers, changes in output, and/or changes in calculation methodology (i.e. any changes the entity made to the measurement approach, inputs and assumptions during the reporting period and the reasons for those changes, if any)	Not Applicable. This is a baseline report.
Total amount of Scope 2 GHG emissions (CO ₂ -e) that are covered under emissions-limiting regulations (tonne) for the jurisdiction in which the company is working.	0.000
Percentage of its gross global Scope 2 GHG emissions that are covered under an emissions-limiting regulation or program that is intended to directly limit or reduce emissions, i.e., cap-and-trade schemes, carbon tax/fee systems, and other emissions control (e.g., command-and-control approach) and permit-based mechanisms	0.0000%
Discuss long-term and short-term strategy or plan to manage Scope 2 emissions, emissions reduction targets, and an analysis of performance against those targets	There are no plans to manage Scope 2 emissions at this time.
Standards, methodologies, assumptions, and/or calculation tools used and what was the reason they have been chosen	Nevada electricity grid power conversion factor used as of January 2022 (source: carbonfootprint.com).

Air Emissions

Report emissions of air pollutants that are released into the atmosphere

Emissions of carbon monoxide, reported as CO (tonne)	0.000	
		The 2023 Air Emission Report was received and approved by the Nevada Department of Environmental Protection Agency - SLEIS. Confirmation number S202402140915116-FA0390-R2023.
Emissions of oxides of nitrogen (NOx), reported as NOx (tonne)	0.000	
Emissions of oxides of sulphur (SOx), reported as SOx (tonne)	0.000	
Emissions of Particulate Matter 10 micrometres or less in diameter (PM ₁₀), reported as PM ₁₀ (tonne)	0.000	
Emissions of lead and lead compounds, reported as Pb (tonne)	0.000	
Emissions of mercury and mercury compounds, reported as Hg (tonne)	0.000	
Emissions of non-methane Volatile Organic Compounds (VOCs) (tonne)	0.000	Hycroft Resources and Development, Inc. (HRDI) currently holds four air quality permits (Class I Operating Permit to Construct- Mill; Class I Operating Permit to Construct- Gyro Crusher; Class II Operating Permit and Mercury Operating Permit to Construct) for the Hycroft Mine. Appropriate modifications to the air quality permits will be obtained from the Bureau of Air Pollution Control (BAPC) for the new Project facilities and land disturbance. As per BAPC regulations, the project air quality operating permits must be authorized by the BAPC prior to project commissioning. Pollution control equipment is and will continue to be monitored according to construction and operating permits. Fugitive dust is and will continue to be monitored and controlled according to the Surface Area Disturbance Dust Control Plan as required by BAPC.

Energy

Energy Consumption

Total energy consumption within the organization (gigajoules, GJ)	40,216.187
Report the energy owned and controlled by the organization consumed in gigajoules for the following	40,216.187
Electricity purchased/generated for consumption (gigajoules, GJ)	40,216.187
Heating purchased/generated for consumption (gigajoules, GJ)	0.000
Cooling purchased/generated for consumption (gigajoules, GJ)	0.000
Steam purchased/generated for consumption (gigajoules, GJ)	0.000
Non-renewable fuel consumed (gigajoules, GJ)	0.000
Renewable fuel consumed (gigajoules, GJ)	0.000
Report energy owned and controlled by the organization sold in gigajoules and report the totals for each	0.000
Electricity sold (gigajoules, GJ)	0.000
Heating sold (gigajoules, GJ)	0.000
Cooling sold (gigajoules, GJ)	0.000
Steam sold (gigajoules, GJ)	0.000

Energy Management

Total energy consumed in aggregate, in gigajoules (GJ) (hydrocarbons and electricity) including the fuel types used (e.g., biomass, hydro-electric power or bioenergy)	40,216.187
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Percentage energy consumed that was supplied by grid electricity	100.0000%
Percentage of energy consumed that is renewable energy (does not include purchased grid-mix)	0.0000%
	Hycroft did not produce energy in 2023. 100% of the energy consumed was purchased from the Nevada Energy (NVE) grid -specifically the Valmy and Fort Churchill Power Stations. According to their website - 13.7% of this power is from renewable sources including power from installed and operational wind, solar, and geothermal facilities.

Water Management - Stewardship

Quality and Quantity Dependency

Rate the importance (current and future) of freshwater quality and quantity to the success of your business		
	Direct use importance rating	Not very important
	Indirect use importance rating	Not very important
Rate the importance (current and future) of sufficient quantity of recycled, brackish and/or produced water for the success of your business		
	Direct use importance rating	Important
	Indirect use importance rating	Important

Risk Assessments

Does your organization undertake a water-related risk assessment	Yes, water-related risks are assessed
	<p>The Hycroft Mine currently has water rights which are believed adequate to support potential future operations. Hycroft controls a total of 16 separate water right permits administered by the NDWR. These permits are held in ownership either by Hycroft, or by other private parties and leased to Hycroft. Water resources to support the Mine are controlled under 11 permits in the Black Rock Desert Basin totaling 21,457.95 acre-feet per year (6.99 billion gallons per year).</p> <p>The Hycroft Mine is situated on the eastern edge of the Black Rock Desert and on the western flank of the Kamma Mountains between Winnemucca and Gerlach, Nevada. There are no streams, rivers or major lakes in the general area. The climate of the region is arid, with precipitation averaging 7.7 inches per year. Average temperatures during the summer range from 50°F to 90°F and average winter temperatures range from 20°F to 40°F.</p>
Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on operations	No

Opportunity Assessments

Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business	Yes, we have identified opportunities, but are unable to realize them
	Hycroft is assessing water quality for alternative re-use possibilities - specifically looking at water from open pit operations for dust control, water from pit depressurization wells for direct use in process operations which would reduce demand for fresh water, and water from future underground mining operations in geothermal applications.

Responsibility

Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues	Other C-Suite Officer, please specify
	Senior Vice President, General Manager

Policy

Does your organization have a documented water policy	No
Select the options that best describe the scope and content of your organizations' water policy	None
Reporting	
Frequency of reporting to the board on water-related issues	Quarterly Any water quality issues or non-conformances are reported to the Board of Directors - Safety and Technical Committee (STC). This committee provides a summary report to the whole Board of Directors during their quarterly meeting.
Incentives	
Do you provide incentives to C-suite employees or board members for the management of water-related issues	No, and we do not plan to introduce them in the next two years
Strategy	
Are water-related issues integrated into any aspects of your long-term strategic business plan	Yes, water-related issues are integrated
If water-related issues are integrated into any aspects of your long-term strategic business plan, please describe further	Future Process Plant will be dependent on fresh and recyclable water. Hycroft is a zero water-discharge facility, therefore water quantity and quality will be monitored closely. Fresh water will come from bore holes and depressurization wells. Depressurization wells will be installed around the open mine pit to minimize hydraulic pressure on the high walls. Recycle water will come from the Tailings Storage Facility. Water Treatment facility is designed into the Process Plant operations.
If water-related issues are integrated into any aspects of your long-term strategic business plan, identify the associated long-term time horizon	5-10 years

Water

Reuse and recycle

Total volume of water that has been used in an operational task and is recovered and used again in an operational task, either without treatment (reuse) or with treatment (recycle) (megalitres)

0.000

Water Management

Disclose the amount of freshwater water that was consumed in its operations (in thousands of cubic meters)

3.000

Less than 3,000 cubic meters of freshwater were pumped from the freshwater wells in 2023.

Analyse and list all operations for water risks and identify activities that withdraw and consume water in locations with High (40–80%) or Extremely High (>80%) Baseline Water Stress as classified by the World Resources Institute's (WRI) Water Risk Atlas tool, Aqueduct

Not applicable.

Hycroft operates in northern Nevada, USA and there are no areas of High or Extremely High Baseline Water Stress locations within 1500 km of the Company's planned area of operation. According to the World Resources Institute's (WRI) Water Risk Atlas Tool, the planned area of operation's baseline water stress is low-medium.

Hycroft will monitor groundwater sources according to State of Nevada, Department of Environmental Protection standards and will maintain water quality and quantity for wildlife, livestock, and human consumption to State of Nevada standards. Protection measures shall be taken to control potential artesian groundwater flows.



WRI Water Risk Map

Was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations

No

Water and Effluents

Water Consumption

Report the total water consumption from all areas in megalitres

0.003

Waste Management

Tailings Storage Facilities Management

Does your company manage Tailings Storage Facilities

No

Details: Tailings Storage Facility (TSF) will be an essential part of Hycroft's future development plans and will be subject to various federal and state laws and regulations governing protection of the environment. The federal laws and regulations, among other things:

- impose strict, joint and several liability on current and former owners and operators of sites and on persons who disposed of or arranged for the disposal of hazardous substances found at such sites (the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"));
- govern the generation, treatment, storage and disposal of solid waste and hazardous waste (the Resource Conservation and Recovery Act of 1976, as amended ("RCRA"));
- restrict the emission of air pollutants from many sources, including mining and processing activities (the Clean Air Act of 1970, as amended (the "Clean Air Act"));
- require federal agencies to integrate environmental considerations into their decision-making processes by evaluating the environmental impacts of their proposed actions, including the issuance of permits to mining facilities and assessing alternatives to these actions (the National Environmental Policy Act of 1970, as amended ("NEPA"));
- regulate the use of federal public lands to prevent undue and unnecessary degradation of the public lands (the Federal Land Policy and Management Act of 1976, as amended (the "FLPMA"));
- restrict and control the discharge of pollutants and dredged and fill materials into waters of the United States (the Clean Water Act of 1972, as amended (the "Clean Water Act")); and
- regulate the drilling of subsurface injection wells (the Safe Drinking Water Act of 1974, as amended (the "Safe Drinking Water Act") and the Underground Injection Control Program promulgated thereunder).

Disclose the approach to the development of Emergency Preparedness and Response Plans (EPRPs)

Emergency Preparedness and Response Plan will be required prior to becoming operational. Hycroft is committed to constructing, commissioning, and operating our tailings storage facility in accordance with industry standards at that time.

Reclamation

We are required to mitigate long-term environmental impacts by amending, backfilling, stabilizing, contouring, re-sloping, and re-vegetating various portions of a site after mining and mineral processing are completed, mitigating potential impacts to surface water and groundwater resources. These reclamation efforts will be conducted in accordance with detailed plans, which must be reviewed and approved by the appropriate regulatory agencies.

Our reclamation obligations at the Hycroft Mine are secured by surface management surety bonds that meet the financial assurance requirements of the State of Nevada and the Bureau of Land Management ("BLM"). Our most recent reclamation cost estimate was approved by the BLM and the State of Nevada in July 2020. As of December 31, 2023, our surface management surety bonds totaled \$58.7 million, of which \$58.3 million secures the financial assurance requirements for the Hycroft Mine, and \$0.4 million secures the financial assurance requirements for the adjacent water supply well field and exploration within the project boundary. The Company began performing reclamation activities on its Crofoot leach pad beginning in 2023 and expects to continue the Crofoot reclamation activities in 2024.

Biodiversity

Management Plan

Describe the environmental and biodiversity management plan(s) implemented at active sites

Approved Environmental Plan received October 2019.



Approved EIS Plan

Under the Environmental Impact Statement, the project alternatives to be implemented by Hycroft will have no impact on any threatened or endangered listed species and will result in fewer acres of habitat loss. Annual monitoring, mitigation, and adaptive management procedures are conducted to reduce impacts on wildlife including avian species. Coordination with agencies having regulatory authority (e.g. Nevada Department of Wildlife (NDOW) and

1.1 Lifecycle stages to which the plan(s) apply

Exploration and appraisal

1.2 The topics addressed by the plan(s)

- Ecological and biodiversity impacts
- Waste generation
- Noise impacts
- Emissions to air
- Discharges to water
- Natural resource consumption
- Hazardous chemical usage

1.3 The underlying references for its plan(s), including whether they are codes, guidelines, standards, or regulations; whether they were developed by the entity, an industry organization, a third-party organization (e.g., a non-governmental organization, a governmental agency, or some combination of these groups)

The Environmental Impact Statement (EIS) is an industry-standard developed by the regulators (Bureau of Land Management).

Impacts

Does access to the site involve traversing a protected area

No

Do any of the entities concessions share a watershed with a protected area

No

Provide context and description of site access involving traversing protected areas, and/or watersheds shared with a protected area. Include reference to measures in place to assure access, any proactive programs to support the biodiversity of the protected area, and any formal complaints or compliance issues and related steps to resolve

Hycroft Mine is located on Jungo Road which is a 101-mile public road in Northern Nevada, connecting the towns of Gerlach and Winnemucca. Site location is 58 miles from Winnemucca, Nevada.

Access to site does not traverse protected areas or water sheds.

Hycroft Mine is located in an area with biodiversity considerations. As a result, the company will conduct a nest survey within potential breeding habitat prior to any surface disturbance during the avian breeding season, and install fences and netting to prevent access by avian wildlife, livestock, and larger wildlife.

The Company will also conduct a noxious weed survey within the entire plan of operations boundary, and monitor for the presence of noxious weeds in accordance with the Hycroft Noxious Weed Monitoring and Control Plan. Following construction activities, areas of disturbed land no longer required for operations will be reclaimed to promote the reestablishment of native plant and wildlife habitats.

Percentage of proved reserves in sites with protected conservation status or in areas of endangered species habitat

Does Not Apply

Hycroft is still in the exploration stage and Proven Reserves have not been identified in the Plan of Operation area.

Percentage of probable reserves in sites with protected conservation status or in areas of endangered species habitat

Does Not Apply

Hycroft is still in the exploration stage and Probable Reserves have not been identified in the Plan of Operation area.

Social

Scale of the Organization

Direct Employee Information

Total number of full-time employees

77

Full-time - Male

49

Full-time - Female

28

Full-time - Non-binary

0

Full-time - Gender not disclosed

0

Total number of permanent employees (full-time & part-time)

77

Permanent employees - Male	49
Permanent employees - Female	28
Permanent employees -Non-binary	0
Permanent employees - Gender not disclosed	0
Total number of direct employees (includes full-time, part-time, temporary; exclude workers who are not employees)	77
Direct employees - Male	49
Direct employees - Female	28
Direct employees - Non-binary	0
Direct employees - Gender not disclosed	0
Describe the methodologies and assumptions used to compile the data	Employees self-report at start of employment.
Are the numbers reported in head count, full-time equivalent (FTE), or using another methodology	Head count.
Are the numbers reported at the end of the reporting period, as an average across the reporting period, or using another methodology	At the end of the reporting period.
Provide contextual information necessary to understand the direct employment information provided	Data collected from the Hycroft Human Resources Information System (HRIS).
Describe significant fluctuations, if any, in the number of direct employees during the reporting period and between reporting periods	Fluctuations occurred based on operational demand.
Workers Who are Not Employees	
Total number of workers who are not employees and whose work is controlled by the organization (e.g., suppliers, customers, or other business partners, such as in joint ventures)	33
Describe the most common types of workers who are not employees and their contractual relationship with the organization	Suppliers and Contractors
The type of work they perform	Delivery of goods and services. Drillers. Hycroft uses professionally training drilling companies to drill core and test holes for ore body definition.
Describe the methodologies and assumptions used to compile the information about workers who are not employees.	Workers who are not employees are reported as full-time equivalent (FTE) based on total annual man-hours.
Is the number of workers who are not employees reported in head count, full-time equivalent (FTE), or using another methodology	The number of workers who are not employees is reported as full-time equivalent (FTE) based on an annual total of 67,879 contractor man-hours. The FTE was calculated based on the average hours worked by full-time employees in the United States (2,080 man-hours annually).
Is the number of workers who are not employees reported at the end of the reporting period, as an average across the reporting period, or using another methodology	The number of workers who are not employees is reported based on the total man-hours calculated at the end of the reporting period.
Describe significant fluctuations, if any, in the number of workers who are not employees during the reporting period and between reporting periods	Not applicable.
Total Workforce	
Total workforce (includes direct employees and workers who are not employees)	110
Workers who are not employees (contractors) as percentage of total employed workforce	30.0000%
Turnover & Gender Breakdown	
Female direct employees	
Total number of turnover (the number of females that left during the period)	7
	Five female employees voluntarily left in 2023 - three left to pursue life choices and returned to school to expand their education, one left to support her family, and one left to pursue a career outside of mining. One individual was terminated for disciplinary

		action, and one was given the opportunity to self-terminate.
	Rate of turnover, females	25.4545%
		Five female employees voluntarily left in 2023 - three left to pursue life choices and returned to school to expand their education, one left to support her family, and one left to pursue a career outside of mining. One individual was terminated for disciplinary action, and one was given the opportunity to self-terminate.
Male direct employees		
	Total number of turnover (the number of males that left during the period)	7
		Five male employees voluntarily left in 2023 - three left to advance their careers at other mining operations, one left to support his family, and one individual retired after 40-years of distinguished service in the mining industry. One individual was terminated for disciplinary action, and one was given the opportunity to self-terminate.
	Rate of turnover, males	14.7368%
		Five male employees voluntarily left in 2023 - three left to advance their careers at other mining operations, one left to support his family, and one individual retired after 40-years of distinguished service in the mining industry. One individual was terminated for disciplinary action, and one was given the opportunity to self-terminate.
Non-binary direct employees		
	Total number of turnover (the number non-binary that left during the period)	0
	Rate of turnover, non-binary	Does Not Apply
Gender not disclosed employees		
	Total number of turnover (the number of "gender not disclosed" direct employees" that left during the period)	0
	Rate of turnover, "gender not disclosed"	Does Not Apply
Report the total number and rate of turnover for all Direct Employees		
	Total number of turnover (the number that left during the period)	14
		Ten individuals left voluntarily, and four individuals were terminated for disciplinary action.
	Rate of turnover - direct employees	18.6667%
Turnover & Age Breakdown		
	Identify types of employees captured in the turnover rate calculations	All employees on the payroll

Diversity and Equal Opportunity

Diversity of Governance Bodies

Report the percentage of the diversity categories for the highest governance body and the total workforce per employee type

Board of Directors		
	Total Board of Directors	7
	Percent Male	71.4286%
	Percent Female	28.5714%
	Percent Non-Binary	Does Not Apply

Percent Gender not disclosed	Does Not Apply
Percent under 30 years of age	0.0000%
Percent between 30 and 50 years of age	0.0000%
Percent over 50 years of age	100.0000%
Percent minority or vulnerable group individuals in the "Board of Directors" category	16.6667%

Diversity of Direct Employees

Senior Management

Total Senior Managers	10
Percent Male	40.0000%
Percent Female	60.0000%
Percent Non-Binary	0.0000%
Percent of gender not disclosed	0.0000%
Percent under 30 years of age	0.0000%
Percent between 30 and 50 years of age	20.0000%
Percent over 50 years of age	80.0000%
Percent of minority or vulnerable group individuals in the "Senior Management Employee" category	10.0000%

Salaried (excluding Senior Management)

Total Salaried (excluding Senior Management)	32
Percent Male	71.8750%
Percent Female	28.1250%
Percent Non-Binary	0.0000%
Percent Gender not disclosed	0.0000%
Percent under 30 years of age	3.1250%
Percent between 30 and 50 years of age	59.3750%
Percent over 50 years of age	34.3750%
Percent of minority or vulnerable group individuals in the "Salaried Employee" category	34.3750%

Technical Employees (skilled hourly)

Total Technical Employees	35
Percent Male	60.0000%
Percent Female	40.0000%
Percent Non-Binary	0.0000%
Percent Gender not disclosed	0.0000%
Percent under 30 years of age	17.1429%
Percent between 30 and 50 years of age	45.7143%
Percent over 50 years of age	37.1429%
Percent of minority or vulnerable group individuals in the "Technical employee" category	51.4286%

Percentage of total direct employees covered by collective bargaining agreements (%)	0.0000%
	There are no collective bargaining employment agreements at Hycroft.
For direct employees not covered by collective bargaining agreements, report whether the organization determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organizations	Not Applicable
	There are no collective bargaining employment agreements at Hycroft.
Notice Periods	
Minimum number of weeks' notice typically provided to direct employees in the active workforce and their representatives prior to the implementation of significant operational changes that could substantially affect them	2
	Two weeks are typically provided to all employees affected by the operational change.

Occupational Health and Safety

Work-related Injuries

Injuries - For the total workforce

Number of fatalities as a result of work-related injury	0
	In 2023, there were no fatalities at Hycroft.
Rate of fatalities resulting from work-related injury. Note: calculating per 200,000 hours worked	0.000
Number of high-consequence work-related injuries (excluding fatalities)	0
	In 2023, there were no high-consequence work-related injuries.
Rate of high-consequence work-related injuries (excluding fatalities)	0.000
	In 2023, there were no high-consequence work-related injuries.
Number of recordable work-related injuries	0
Rate of recordable work-related injuries	0.000
Main types of work-related injury, e.g., confined space, trips, falls, etc	Not applicable for the reporting period.
	In 2023, there were no high-consequence work-related injuries.
Lost Time Injuries (LTIs)	0
Lost Time Injury Rate (LTIR)	0.000
Injuries - workers who are not employees, but whose work and/or workplace is controlled by the organization	
Number of fatalities as a result of work-related injury	0
Rate of fatalities resulting from work-related injury. Note: calculating per 200,000 hours worked	0.000
Number of high-consequence work-related injuries (excluding fatalities)	0
Rate of high-consequence work-related injuries (excluding fatalities)	0.000
Number of recordable work-related injuries	0
Rate of recordable work-related injuries	0.000
Main types of work-related injury, e.g., confined space, trips, falls, etc	Not applicable for the reporting period.
Lost Time Injuries (LTIs)	0
Lost Time Injury Rate (LTIR)	0.000

Combined (Employees and non-employees, but controlled by the organization):	
Total number of all work-related injuries	0
Rate of work-related injuries	0.000
Total Lost Time Injuries (LTIs)	0
Lost Time Injury Rate (LTIR)	0.000
Report the work-related hazards that pose a risk of high-consequence injury, including	Confined space; slips, trips, and falls; traffic control; electrical; working alone; and machine guarding. Hycroft operates under the guidelines of U.S. Mine Safety and Health Administration (MSHA) - Part 46. MSHA publishes hazards and lesson-learned notifications from other mines to assist in risk management, incident investigations, workplace inspections, training exercises, and improved employee awareness.
How have these hazards been determined	MSHA notifications from other mines, experience, employee engagements, and workplace inspections.
Which of these hazards have caused or contributed to high-consequence injuries during the reporting period	None
Actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls	Continued employee awareness and improved workplace inspections.
Report on actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls	Improved housekeeping; eliminated high-risk tasks or improved pre-task planning.
Have rates been calculated based on 200,000 or 1,000,000 hours worked	200,000
Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded, e.g., short-term contractors	There have been no exclusions in this disclosure.
Disclose any contextual information necessary to understand how the data have been compiled, i.e., any standards, methodologies, and assumptions used	Hycroft follows the U.S. MSHA guidelines for reporting all incidents and accidents. US Mine Safety and Health Administration - Part 46 is very prescriptive on reporting all accidents and incidents. There are no exclusions.

Safety Training

Describe any occupational health and safety training provided to workers, including generic training, as well as training on specific work-related hazards, hazardous activities, or hazardous situations



Commitment to Safety

Everyone at Hycroft is required to attend 40-hr New Employee Training and 24-hr Annual Refresher Training.

We believe that safety is a core value and we support that belief through our philosophy of safe work performance. Our mandatory mine safety and health programs include employee engagement and ownership of safety performance, accountability, employee and contractor training, risk management, workplace inspection, emergency response, accident investigation, and program auditing. This integrated approach is essential to ensure that our employees, contractors, and visitors operate safely.

New employee training and Annual Refresher training is required under US MSHA guidelines and the training topics are clearly defined under Part 46. All Hycroft employees are required to complete these training exercises prior to work. There are no exclusions.

Disclose the average number of training hours provided to its workforce for health, safety, and emergency management training	
Average hours of health, safety, and emergency response training for (a) full-time/direct employees	24.62
Average hours of health, safety, and emergency response training for (b) workers who are not employees (contractors)	0

Describe the nature of any social risks, for all operating countries, that could have a material impact on the operations	<p>Hycroft Mine is located in Nevada, USA. This is a location that encourages safe and secure operations.</p> <p>Nevada is a right-to-work state where employees are protected under federal employment laws and every individual can speak openly, engage management on issues or concerns, and work without intimidation. Workers also have the right to terminate and seek employment elsewhere.</p> <p>Hycroft Mine is not located in indigenous lands but holds concessions in areas with potential impacts on cultural heritage.</p>
Percentage of proved reserves that are located in or near areas of active conflict	<p>Does Not Apply</p> <p>Hycroft Mine is located northern Nevada, USA and is not an area of active conflict.</p>
Percentage of probable reserves that are located in or near areas of active conflict	Does Not Apply
Percentage of proved reserves that are located in or near areas that are considered to be indigenous peoples' land	<p>Does Not Apply</p> <p>Hycroft Mine is on private land and surrounded by land controlled by the U.S. Bureau of Land Management.</p>
Percentage of probable reserves that are located in or near areas that are considered to be indigenous peoples' land	Does Not Apply
Which indigenous rights of communities in which the entity operates or intends to operate are respected, provide a description of the entity's due diligence practices and procedures in the details.	<ul style="list-style-type: none"> • Use of free, prior, and informed consent (or consultation) processes • The establishment of project grievance mechanisms • The establishment of formal community agreements <p>Hycroft Mine is not located close to an indigenous community and does not operate on lands owned by indigenous people or groups.</p>
Which human rights procedures the entity's due diligence practices include, provide description in the details	<ul style="list-style-type: none"> • Upholding the fundamental ILO conventions on fair wages (No. 100) • Upholding the fundamental ILO conventions on child labour (No. 138, No. 182) • Upholding the fundamental ILO conventions on forced labour (No. 29, No. 105) • Upholding the fundamental ILO conventions on collective bargaining (No. 98) • Upholding the fundamental ILO conventions on freedom of association (No. 87) • Upholding the fundamental ILO conventions on discrimination (No. 111) <p>Please refer to the attached Human Rights Policy.</p>



Human Rights Policy

Community Relations

Artisanal and Small-Scale Mining

Number of company operating sites where artisanal and small-scale mining (ASM) takes place on, or adjacent to, the site (not controlled by company/unauthorized)	<p>0</p> <p>There are no artisanal or small-scale operations within 50-miles of the Hycroft operation.</p>
Percentage of company operating sites where artisanal and small-scale mining (ASM) takes place on, or adjacent to, the site	0.0000%
Report the associated risks and the actions taken to manage and mitigate these risks	Not applicable
Discuss the processes, procedures, and practices to manage risks and opportunities associated with the rights and interests of communities in areas where it conducts business	Hycroft has taken steps to minimize potential impacts on cultural heritage sites. A Historic

Property Treatment Plan was developed to mitigate this impact. In addition, the project developed alternatives to avoid potential impacts on cultural or religious artifacts of significance to Native American tribal members. Hycroft has committed to the notification, rescue, and salvaging of any potential cultural chance finds as per regulation.

Information exchange and government-to-government consultation with Native American tribes related to the project have been ongoing for several years. Hycroft has complied with the public disclosure of its Environmental Impact Statement and continues to provide updates to potentially affected Native American tribes regarding project developments.

Programs

Report on community relations programs, objectives and achievements in the past 3 years

Hycroft has proactively engaged and supported the community.

Over the past 3-years, Hycroft has proactively engaged the local community by supporting educational programs, providing training classes, and holding on-site tours to the community. Hycroft has been active in local government on special projects, supporting youth recreation activities, construction of youth and aged facilities, and establishing scholarship programs. Specific examples include but are not limited to supporting the Safe Haven Wildlife Sanctuary, donating to the construction of pickleball courts at Whitworth Rec Center, donating to improvements at the Winnemucca water system, donating to the Giving on the Green golf tournament, donating trees for the Lions Club Festival of Trees program, supporting the Humboldt County Library Summer Reading Program, donating to the Winnemucca Rotary Club, providing materials for water systems at two non-profit sanctuaries, sponsoring health care assessment programs for the Lovelock Paiute Indian Tribe, supporting the Winnemucca Domestic Violence Services, and participating in the Northern Nevada Arts Council.

Risks and Opportunities

Disclose the total number of site shutdowns or project delays due to non-technical factors

0

Disclose the total aggregate duration (in days) of site shutdowns or project delays due to non-technical factors

0

Discuss specific delays including associated costs, root cause and corrective actions for resolved delay, and status of ongoing delays

Not applicable

Hycroft had no site shutdowns in 2023. Therefore, there was no financial cost, no root causes to investigate, and no corrective actions required for resolution.

Governance

Governance structure and composition

Describe the governance structure, including committees of the highest governance body (e.g. the Board of Directors, the Executives, the Board Environment Committee, Board Safety Committee, the Advisory Committee, etc.)

The Board of Directors is responsible for providing oversight and holding management accountable for the Company's safety and sustainability performance.

The Board delegates specific matters to each of the Board's standing committees to ensure sustainability considerations are integrated into the business at all levels of the organization.

Each Committee provides summaries to the Board, which reviews key sustainability matters.

Identify and list the committees of the highest governance body that are responsible for decision making and overseeing the management of the organization's impacts on the economy, environment

The Environmental, Social and Governance Committee of the Board of Directors has direct

and people including the oversight of sustainability-related risks and opportunities (e.g. Board level Environment Committee, Safety Committee, ESG Committee, Advisory Committee, etc.)

oversight of the majority of the environmental and social impacts.

The Board of Directors considers cybersecurity risk as part of its risk oversight function. It has delegated oversight of cybersecurity and other information technology risks to the Audit Committee ("AC"). The AC oversees the implementation of the cybersecurity risk management program and receives periodic reports from management on potential cybersecurity risks and threats and receives presentations on cybersecurity topics from Hycroft's Information Systems Manager. The AC reports to the full Board of Directors regarding its activities, including those related to cybersecurity. The full Board of Directors also receives briefings from management on the cybersecurity risk management program as needed.

Delegation of responsibility for managing impacts

Describe whether the highest governance body has appointed any senior executives with responsibility for the management of organization's impacts on the economy, environment and people (e.g., is it part of the Governance structure of the company, CEO's role, CFO's role, Sustainability Executive, etc.)

The Board has tasked the Chief Executive Officer (CEO) with adhering to the environmental and social standards.

Details: The Company's CEO has been assigned the responsibility for the implementation and adherence to this Sustainability Policy both within its corporate endeavors and at its operating locations. The Sustainability Policy is informed by actual and potential corporate impacts on the environment, direct employees, contractors, and suppliers. The objective of the policy is to ensure that sustainability processes are integrated into all activities within Hycroft.

The Board of Directors has tasked the CEO with managing the impacts on economy, environment and people.

In addition, management is responsible for assessing and managing material risks from cybersecurity threats. Management has primary responsibility for overall cybersecurity risk management program and supervises both the internal cybersecurity personnel and external cybersecurity consultants. Hycroft's Information Systems Manager has many years of experience leading cybersecurity oversight and has extensive experience with information technology, including security, auditing, compliance, systems, and programming.

The management team supervises efforts to prevent, detect, mitigate, and remediate cybersecurity risks and incidents through various means, which may include briefings from internal security personnel, threat intelligence and other information obtained from governmental, public or private sources, including external consultants; and alerts and reports produced by security tools deployed in the IT environment. Cybersecurity incident response plan governs the assessment and response upon the occurrence of a material cybersecurity incident, including the process for informing senior management and our Board of Directors.

[Sustainability Policy](#)

Describe whether the highest governance body has delegated responsibility for the management of impacts to other employees

Under the CEO's leadership, the responsibility for the day-to-day environmental and social impact management has been delegated to the Environmental and Sustainability manager.

Policy commitments

Provide a description of the organization's policy commitments for responsible business conduct

Hycroft has adopted policies, approved by the Board of Directors. Key policies that are in place include:



Sustainability Policy



Whistleblower Policy



Regulation FD



Insider Trading Policy



Minimum Ownership Guidelines Policy



Human Rights Policy Poster

- (1) Anti-Bribery and Anti-Corruption Policy;
- (2) Code of Business Conduct & Ethics;
- (3) Code of Conduct and Ethics for Senior Financial Officers;
- (4) Compensation Recovery Policy;
- (5) Corporate Governance Guidelines;
- (6) Diversity and Inclusion Policy;
- (7) Insider Trading Policy;
- (8) Minimum Share Ownership Policy;
- (9) Regulation Fair Disclosure (FD) Policy;
- (10) Sustainability Policy; and a
- (11) Whistleblower Policy

These policies serve as a guide to all directors and employees of Hycroft to help meet our commitment to a culture of honesty, integrity, and accountability where we strive to operate our business in accordance with the highest ethical standards and applicable laws, rules, and regulations.

The policies include a Code of Business

Conduct and Ethics, which requires the observance of high standards of business and personal ethics in the conduct of all directors, officers, and other employees of Hycroft.

In addition, the Audit Committee of the Board of Directors of Hycroft oversees complaints, reports, and concerns by any individual regarding (a) questionable accounting practices, inadequate internal accounting controls or coercion relating to auditing matters; (b) actual or potential violations of any applicable law; and (c) other suspected wrongdoing, including conduct prohibited under the Code of Business Conduct and Ethics.

[Anti-Bribery and Anti-Corruption Policy](#)

[Code of Business Ethics Policy](#)

[Code of Conduct and Ethics for Senior Financial Officers Policy](#)

[Compensation Recovery Policy](#)

[Corporate Governance Guidelines](#)

[Diversity and Inclusion Policy](#)

<p>What are (if any) the authoritative intergovernmental instruments that the commitments reference</p>	<p>Hycroft abides by the United Nations Guiding Principles on Business and Human Rights and the UN Declaration of Human Rights, and we recognize and respect the unique rights of indigenous communities. Hycroft is committed to conducting our business activities in a manner that is consistent with the principles of Free Prior and Informed Consent (FPIC), as recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Hycroft also embeds the American Anti-Corruption Act (AACA) into its employee handbook.</p>
<p>Do the commitments stipulate conducting due diligence</p>	<p>No</p>
<p>Do the commitments stipulate applying the Precautionary Principle or Approach (see instructions).</p>	<p>Yes</p>
<p>Do the commitments stipulate respecting human rights</p>	<p>Yes</p>
<p>Describe the specific policy commitment to respect human rights</p>	<p>Integral within our policy commitments and outlined in our employee handbook, our policy commitments are supported by our value-based culture and social performance principles:</p> <ul style="list-style-type: none"> ▪ Ensure the Health & Safety of all of Hycroft's employees and site visitors. ▪ Responsibly operating to the highest standard. ▪ Strict adherence to business ethics compliance and governance. ▪ Unconditional commitment to Hycroft's human rights policy and performance standards, consistent with internationally accepted standards. ▪ Recognition and appreciation for diversity and ensuring that all groups have open access to information and ability to communicate concerns. ▪ Respect the community of which we employee and the community in which we operate through a transparent, collaborative and fully engaged process.
<p>What are (if any) the internationally recognized human rights that the commitment covers</p>	<p>Hycroft policy commitments and actions recognize and protect all 30 basic human rights as outlined in the Universal Declaration of Human Rights (UDHR) by United Nations.</p>
<p>What are the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment</p>	<p>Hycroft applies its policy commitments equally to all humans.</p>

Provide links to the policy commitments, if publicly available, or, if the policy commitments are not publicly available, explain the reason for this	https://www.hycroftmining.com/about/corporate-governance/
Report the level at which each policy commitment was approved within the organization, including whether this is the most senior level	Hycroft Board of Directors
To what extent the policy commitments apply to the organization's activities and to its business relationships	Hycroft's policy commitments are the foundation and guiding principles for our employees' business and social conduct while representing Hycroft.
Describe how the policy commitments are communicated to employees, business partners, and other relevant parties	The Board of Directors assesses Hycroft's policies annual. All employees are required to review and acknowledge Hycroft's policies. Hycroft shares its policies openly on our company website.

Embedding policy commitments

Describe how the organization embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships

How are responsibilities allocated in order to implement the commitments across different levels within the organization	The responsibility to implement our commitment rests on the management team (CEO, CFO, SVPs, VPs, Directors, Managers, and Supervisors) as part of their stated duties.
How are the commitments integrated into organizational strategies, operational policies, and operational procedures	Hycroft uses the policies as a clear guideline in developing operational policies.
How does the organization implement its commitments with and through its business relationships	Hycroft has implemented a contractor pre-screening process that contains some elements of the commitments in the evaluation.
What implementation training does the organization provide	All employees are required to read and acknowledge, in writing, the policy commitments both during new hire orientation and yearly through annual refresher training. Additionally, all employees are required to acknowledge Hycroft's employee handbook, which is built and based on our policy commitments.

Governance structure and composition

Describe the composition of the highest governance body and its committees by:

Number of executive members (non-independent)	1
Number of non-executive members (non-independent)	0
Number of independent members	6
The total number of governance body members	7
Percentage of independent board members	85.7143%
Less than 3 years of tenure of members on the governance body	3
3-6 years of tenure of members on the governance body	4
6-9 years of tenure of members on the governance body	0
More than 10 years of tenure of members on the governance body	0
Number of other significant positions and commitments held by each member, and the nature of the commitments	See detailed director biographies included in the Company's proxy statement. DEF 14A (Proxy) with director biographies
Number of Male governance body members	5
Number of Female governance body members	2
Number of Non-Binary governance body members	0
Number of Gender not disclosed governance body members	0
Number of members from under-represented social groups	1

Description of competencies relating to economic, environmental, and social topics

See the Company's DEF 14A, Director Skills Matrix

[DEF 14A \(Proxy\) with director skills matrix](#)

Description of stakeholder representation, including employees and other workers

AMC Entertainment, which is a 10% shareholder, holds one Board seat and is currently represented by Sean Goodman, EVP and CFO of AMC.

As capital providers through credit and royalty agreements, the interests of Sprott Private Resource Lending II (Co) are also represented by Michael Harrison, who is Managing Partner of Sprott Streaming and Royalty Fund, and previously served as Managing Director and Interim CEO of Sprott Resource Holdings Inc.

Employees, unions and other workers are currently not directly represented on the Board.

Highest Governance Body

Describe the nomination and selection processes for the highest governance body and its committees

The nomination and selection process is outlined in the Corporate Governance Guidelines.

[Corporate Governance Guidelines](#)

Do you have a diversity policy and if so, provide details, link to the policy or attach the file

Yes. Please refer to the link below for access to our Diversity and Inclusion Policy.

[Diversity and Inclusion Policy](#)

Report the criteria used for nominating and selecting highest governance body members

Discuss whether and how views of the stakeholders (including shareholders) are involved

Stakeholder views are generally captured through direct and indirect communications with senior executives and Board members.

Stakeholder views inform corporate purpose and strategy, which in itself drives the identification of directors' skills needed for effective oversight. Through annual proxy voting, investors also have the right to support the individual director nominations or put forward alternative candidates in accordance with the bylaws of the organization.

Stockholders have an opportunity to submit any proposal to be considered for inclusion in the Company's proxy statement or form of proxy for submission to the stockholders at its annual meeting of stockholders. Such proposals must be submitted in writing and comply with the requirements of Rule 14a-8 of the Exchange Act and its bylaws, as well as received by the Company, c/o Corporate Secretary, at a direct address and by specific deadline outlined in the latest circular.

Discuss whether and how diversity is considered

To the extent practicable, the Nominating and Governance Committee seeks candidates for nomination to the board and its committees who represent different genders, ages, cultural communities, geographic areas, and other characteristics of the communities in which the Company conducts its business, and which are qualified for the particular role.

Discuss whether and how independence is considered

Independence is determined by an analysis conducted under (1) the Corporate Governance Standards of the Nasdaq Stock Market's Nasdaq Listing Rules, Section 5605, as amended ("Nasdaq Rules"); (2) Rule 10A-3 of the Securities Exchange Act of 1934, as amended ("Rule 10A-3"); (3) Rule 16b-3 of the Securities Exchange Act of 1934, as amended ("Rule 16b-3") and (4) Rule 10C-1 of the

<p>Discuss whether and how competencies relevant to the impacts of the organization are considered</p>	<p>Securities Exchange Act of 1934, as amended ("Rule 10C-1"). In addition, "financial expert" status of members of the Audit Committee are reviewed under (1) the "financial expert" under Rule 407 of the Sarbanes-Oxley Act of 2002 ("SOx Rule 407") and Item 407(d)(5)(ii) of Regulation S-K ("Item 407") and (2) independent under Nasdaq's additional independence requirements for audit committee members.</p> <p>The Nominating and Governance Committee (NGC) establishes the annual performance evaluation format, which includes key competencies.</p> <p>The evaluation consists of extensive and detailed written surveys, questionnaires, and/or individual interviews with each director by legal counsel. Individual qualifications and experiences of current directors and nominees are mapped against the key competencies, which include: Health, Safety, Environmental, Sustainability; First Nations/Community Relations; Human Resources; Permitting/Regulatory; Risk Management; etc.</p>
<p>Chair of the highest governance body</p> <p>Is the chair of the highest governance body also a senior executive in the organization (non-independent)</p>	<p>No</p>
<p>Conflicts of Interest</p> <p>Describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated</p>	<p>The Board monitors and assesses periodically any actual or potential conflicts of interest. Disclosures appear in required U.S. Securities and Exchange Commission (SEC) reports.</p> <p>The Board has delegated to the Audit Committee, pursuant to its charter, the responsibility for reviewing and approving related party transactions to the extent that the company enters into such transactions. In addition, each director and executive officer is required to complete a directors' and officers' questionnaire that elicits information about related party transactions. These procedures are intended to determine whether any such related party transaction impairs the independence of a director or presents a conflict of interest on the part of a director, employee, or officer. In its latest proxy statement, a detailed description of related party transactions is provided in regard to the Sprott Credit Agreement, Sprott Royalty Agreement and 2022 Private placement with American Multi-Cinema, Inc., as well as other material relationships.</p> <p>Proxy Circular (2024)</p>
<p>Are conflicts of interest disclosed to stakeholders</p>	<p>Yes</p>
<p>Are there conflicts of interest related to: cross-board membership</p>	<p>No</p>
<p>Are there conflicts of interest related to: cross-shareholding with suppliers and other stakeholders</p>	<p>No</p>
<p>Are there conflicts of interest related to: existence of controlling shareholder</p>	<p>No</p>
<p>Are there conflicts of interest related to: related parties, their relationships, transactions, and outstanding balances</p>	<p>Yes</p> <p>Michael Harrison, Board Member, has an indirect pecuniary interest in shares of our Common Stock beneficially owned by Sprott Private Resource Streaming and Royalty (Collector), LP. and SPRL II as chief executive officer of Sprott Resource Streaming and Royalty Corp. and/or through his fiduciary role as Managing Partner of Sprott Private Resource Streaming & Royalty (Collector) LP. During the years ended December 31, 2023 and 2022, the Company incurred costs of \$0.3 million and \$1.2 million, respectively, to Ausenco Engineering USA South ("Ausenco")</p>

for work preparing the Hycroft Property Initial Assessment Technical Report Summary Humboldt and Pershing Counties, Nevada with an effective date of March 27, 2023, the Initial Assessment Technical Report Summary for the Hycroft Mine with an effective date of February 18, 2022, and for other engineering services. Diane Garrett is currently a non-executive director for Ausenco's parent company Board of Directors. Ms. Garrett's brother, David Thomas, is the Senior Vice President and General Manager of the Hycroft Mine. Mr. Thomas does not report to Ms. Garrett. Please refer to Hycroft's proxy statement filed pursuant to the U.S. Securities and Exchange Commission's disclosure requirements.

Collective knowledge of highest governance body

Report measures taken to advance the collective knowledge, skills and experience of the highest governance body on sustainable development. (e.g. board training)

The Board of Directors meets regularly with management and makes periodic visits to the Hycroft Mine to familiarize itself with the nature of the operations, and to review relevant objectives, procedures and performance with respect to health and safety, environment and social responsibility. Additionally, the Board is offered various educational opportunities.

Directors are encouraged to stay current with industry knowledge and market trends, as well as climate change, environmental, social and governance topics and regulations. In the ordinary course of scheduled Board meetings, management presents information and market trends relevant for risk assessment for operational and financial impacts to the company.

Evaluation of Highest Governance Body

Describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices

There were no changes to the structure of the board or leadership during the reporting period.

The Board believes that the current Board leadership structure, which includes a Lead Independent Director and separation of the Chairman and Chief Executive Officer roles, provides strong oversight, which benefits our stockholders. The Board believes its current leadership structure best serves the objectives of the Board's oversight of management, the Board's ability to carry out its roles and responsibilities on behalf of the Company's shareholders, and the Company's overall corporate governance. The Board also believes that the separation of the Chairman and Chief Executive Officer roles allows our Chief Executive Officer to focus her time and energy on operating and managing the Company, while leveraging our Chairman's experience and perspectives in an oversight role. The separation of roles also allows an effective balance between strong executive leadership and appropriate safeguards and oversight by the Chairman and other independent directors. The Board periodically reviews its leadership structure to determine whether it continues to best serve the Company and its stockholders.

Transparency

Describe the role of the highest governance body and of senior executives in developing, approving and updating the organization's purpose, value or mission statements, strategies, policies and goals related to sustainable development

The Company seeks to operate sustainably and is guided by its Sustainability Policy implemented by the ESG Committee.

[Sustainability Policy](#)

Describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment and people

The Board considers oversight of the Company's risk management efforts, including enterprise risk management and impact

management, to be a responsibility of the entire Board (as reported by and through the appropriate committee in the case of risks under the purview of a particular committee). Management regularly updates the full Board on major Company initiatives, strategies, and related risks. At least annually, management reviews with the Board risks to the enterprise and efforts to address them. In addition, the Board reviews technical studies and environmental impact studies, as well as monitors compliance with environmental permits and regulations. The board is also directly involved in monitoring management protocols for building a safety culture, hiring and retention practices, training programs and stakeholder engagement.

Describe whether and how the highest governance body engages with stakeholders to support these processes

Stockholders and other interested parties can send written communications to one or more members of the Board. Any communication is promptly distributed by the Corporate Secretary to the individual director or the full Board.

Describe how the highest governance body considers the outcomes of these processes

The Board of Directors can request follow up or further action from management and routinely meets in-camera to discuss issues. All governance policies and board and committee charters are reviewed annually to consider whether they are appropriately addressing the company's needs and the regulatory and reporting framework.

Ethics

Ethics and Integrity

Describe how individuals can seek advice on implementing the organization's policies and practices for responsible business conduct

Individuals are encouraged to engage first and foremost with immediate supervisors.

Any violations of the Code of Ethics, or questions about individual or a fellow employee conduct that may have violated any laws or the Code of Ethics, are required to be escalated. If individuals are not comfortable bringing the matter up with immediate supervisor, or do not believe the supervisor has dealt with the matter properly, then individuals need to raise the matter with the Designated Officer. If a law, rule or regulation is in question, then the Designated Officer would refer the individual to the appropriate Corporate legal representatives. The company supports all timely means of reporting possible violations. Directors and officers have the responsibility to report any potential violations of this Code to the Corporate Governance Committee of the Board of Directors.

Describe the mechanisms for individuals to raise concerns about the organization's business conduct

The Company is contracted with NAVEX One - EthicsPoint, which is a whistleblowing and incident management software. EthicsPoint allows any employee to easily report incidents, emerging risks, and compliance concerns.

Reported risks are automatically flagged for proactive risk management. All data is anonymized and secure.

Compliance with laws and regulations

Report the total number of significant instances of non-compliance with laws and regulations that occurred during the reporting period and a breakdown of this total by

0

During the year ended December 31, 2022, the Company received a notice of non-compliance from the closure branch of the Nevada Division of Environmental Protection ("NDEP") Bureau of Mining Regulation and Reclamation regarding a historical reclamation matter. As such, the Company has accelerated certain reclamation activities in order to regain compliance. During 2023 and 2022, there were no known material environmental incidents. We did not incur material capital expenditures

for environmental control facilities during 2023 and 2022, and we do not expect to incur any material expenditures in 2024 for such environmental control facilities.

Number of instances for which fines were incurred	0
Number of instances for which non-monetary sanctions were incurred	0
Report the total number of fines for instances of non-compliance with laws and regulations that were paid during the reporting period	0
Report the monetary value of fines for instances of non-compliance with laws and regulations that were paid during the reporting period (\$)	0
Total number of fines paid for instances of non-compliance with laws and regulations that occurred in the current reporting period	0
Total monetary value of fines for instances of non-compliance with laws and regulations that occurred in the current reporting period (\$)	0
Total number of fines paid for instances of non-compliance with laws and regulations that occurred in previous reporting periods	0
Total monetary value of fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods (\$Million)	0

Describe the significant instances of non-compliance	There have been no instances of non-compliance.
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Describe how it has determined significant instances of non-compliance	Not applicable as there have been no instances of non-compliance.
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Relevant federal and state environmental regulation	<p>While the Company is not conducting active mining operations at the Hycroft Mine, the facilities and prior operations have been and are, and the Company's future development plans may continue to be, subject to extensive federal and state environmental regulation, including those enacted under the following laws:</p> <ul style="list-style-type: none"> • Resource Conservation and Recovery Act (RCRA); • Clean Air Act (CAA); • National Environmental Policy Act (NEPA); • Clean Water Act (CWA); • Safe Drinking Water Act (SDWA); • Federal Land Policy and Management Act (FLPMA); • Bald and Golden Eagle Protection Act of 1940, as amended; and • Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). <p>Additional regulatory authorities may also have or have had jurisdiction over some of the Company's operations and mining projects including the Environmental Protection Agency, the Nevada Division of Environmental Protection, the U.S. Fish and Wildlife Service, the Bureau of Land Management, and the Nevada Department of Wildlife.</p>
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Details: Environmental regulations require the Company to obtain various permits, approvals and licenses and also impose standards and controls relating to development and production activities. For instance, the Company is required to hold a Nevada Reclamation Permit with respect to the Hycroft Mine. This permit mandates concurrent and post-mining reclamation of mines and requires the posting of reclamation bonds sufficient to guarantee the cost of mine reclamation. Changes to the amount required to be posted for reclamation bonds could materially affect the Company's financial position, results of operations, cash flows and liquidity.

Also, the U.S. Fish and Wildlife Service may designate critical habitat and suitable habitat areas it believes are necessary for the survival of a threatened or endangered species. A critical habitat or suitable habitat designation could result in further material land-use restrictions and may materially delay or prohibit land access for development. For example, the Company had to obtain certain permits associated with mining in the area of an eagle habitat. Failure to obtain such required permits or failure to comply with federal and state regulations could also result in delays in beginning or expanding exploration, future operations, incurring additional costs for investigation or cleanup of hazardous substances, payment of penalties for non-compliance or discharge of pollutants, and post-mining closure, reclamation, and bonding, all of which could have a material adverse impact on the Company's financial performance, results of operations, and liquidity.

Anti-Corruption

Confirmed Incidents and Response

Total number and nature of confirmed incidents of corruption	0
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Total number of Bribery cases	0
Total number of Lobbying cases	0
Total number of Extortion cases	0
Total number of Cronyism cases	0
Total number of Nepotism cases	0
Total number of Parochialism cases	0
Total number of Patronage cases	0
Total number of Influence peddling cases	0
Total number of Graft cases	0
Total number of Embezzlement cases	0

Communication and Training

Total number of governance body members that the organization's anti-corruption policies and procedures have been communicated to	7
Total percentage of governance body members that have been communicated to on anti-corruption	100.0000%
Anti-corruption policies and procedures communication to direct employees by type:	
Total number of the direct employees that have been communicated to on anti-corruption	77
Total percentage of the direct employees that have been communicated to on anti-corruption	100.0000%

Communication of critical concerns

Describe whether and how critical concerns are communicated to the highest governance body

Report the number of critical concerns that were communicated to the highest governance body during the reporting period

Report the nature of critical concerns that were communicated to the highest governance body during the reporting period

Remuneration

Report which of the following remuneration policies apply to the highest governance body and senior executives:

Fixed pay	Yes
Variable pay	No
Performance-based pay	Yes
Equity-based pay	Yes
Bonuses	Yes
Deferred and vested shares	Yes
Sign-on bonuses	No
Recruitment incentive payments	No
Termination payments	Yes
Clawbacks	Yes
Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives and all other employees	No

Describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment and people

Senior executives have specific corporate performance objectives including Environmental, Social, and Governance (ESG) criteria and are evaluated according to specific items on ESG and other matters.

Do you provide incentives for the management of climate-related issues, including the attainment of targets	No, and we do not plan to introduce them in the next two years Hycroft is at the exploration and development stage completing engineering work for next phase of commercial operations. During that process, climate-related impacts will be considered in the context of energy sources and water availability. Climate-related targets are not likely to be considered until after achieving commercial production.
Describe the process for designing its remuneration policies and for determining remuneration	The Compensation Committee has implemented compensation policies and philosophies that link a significant portion of executive officers' cash compensation to performance objectives, which include Environmental, Social, and Governance (ESG) objectives.
Are independent members of the highest governance body or an independent remuneration committee overseeing the remuneration process	Yes
How the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration	In 2023, the Compensation Committee of the Board of Directors engaged an independent compensation consultant to provide independent advice on executive officer and director compensation matters.
Describe whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives	Independent Consultants
Report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable	Not applicable.

Stakeholder Engagement

Report the organization's approach to stakeholder engagement, including frequency of engagement by type	
Provide a list of stakeholder groups engaged by the organization	
Report the basis for identifying and selecting stakeholders with whom to engage	
Report the purpose of the stakeholder engagement	

Tax

Describe the approach to stakeholder engagement and management of stakeholder concerns related to tax, including	
The approach to engagement with tax authorities	Open and honest communication. Hycroft Mining Holding Corporation (formerly known as Mudrick Capital Acquisition Corporation) was incorporated under the laws of the state of Delaware on August 28, 2017 and is subject to all relevant US federal and state tax laws and regulations. In 2023, Hycroft built trust with tax authorities by engaging early and openly, taking learned opinions for tactical negotiation, managing audit costs, maintaining comprehensive contemporaneous documentation, and refraining from arguing the indefensible. The team firmly defended positions that were deemed fair while benefiting both parties.
The approach to public policy advocacy on tax	Engaged tax professionals in assessing and understanding new policies. Hycroft provided opinions and information to tax authorities through surveys and campaigns. We engaged tax professionals to understand the new policies which affect our business and our stakeholders. We educated our stakeholders in understanding their benefits and assisted them in receiving their entitled services. We supported our tax consultant during interviews with tax agencies and actively resolved open tax issues.

The processes for collecting and considering the views and concerns of stakeholders, including external stakeholders

Group seminars to collect and discuss views and concerns.

Hycroft shared tax information with employees through information letters, held group seminars to collect and discuss concerns, we kept a contact list of local tax agencies and built efficient ongoing communication links by email and direct call. Hycroft tax disclosure documents are transparent and communicate our current tax status while providing a forward-looking perspective to our shareholders and investors. Hycroft actively collects and considers stakeholders' view and concerns through public social platforms.

This document was prepared using  ONYEN , Planet Earth's complete ESG reporting solution.